



July 27, 2009

Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035
Attn: Sean Ardussi

Subj: Kitsap Alliance of Property Owners Comments on the PSRC Transportation 2040
Draft Environmental Impact Statement (DEIS)

Dear Mr. Ardussi:

This letter transmits our comments on the Transportation 2040 DEIS. It is requested that this submittal be included in its entirety in the DEIS SEPA record.

We believe that our assessment demonstrates sufficient deficiencies and failures in the planning to require that the current version of the DEIS be abandoned and a new document prepared which addresses the actual transportation needs of the region's citizens – specifically a plan which will eliminate highway congestion while allowing people the freedom to choose to drive their vehicles where and when they want without punitive tolling, excessive fuel taxation, or other purposely-intended restrictive controls.

It is significant that the DEIS bases much of its planning on the underlying assumption that greenhouse gasses, particularly carbon dioxide, must be severely reduced to protect society from the effects of climate change. This assumption actually drives the planning, which mandates major reductions in vehicle miles traveled and fuel consumption – goals which are incompatible with a growing region's actual transportation needs.

A large body of hard scientific data refuting this global warming theory is now in the literature. It is unconscionable for the PSRC to remain silent on this relevant scientific evidence, much of which comes from government sources and other respected institutions – all of which would completely invalidate the PSRC planning approach.

Sincerely,

Tim Matthes

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"The small landholders are the most precious part of a state." - Thomas Jefferson

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Summary

The Draft EIS is generally unresponsive to the transportation needs of the region and should be abandoned. Lacking this, at a minimum, it must be revised to add an alternative that evaluates the cost and impacts of constructing the new lane miles actually needed to relieve traffic congestion in the region over the next 25 years. The Draft EIS must also be revised to reflect the latest information on man-made carbon dioxide and climate change.

The Puget Sound Regional Council has taken upon itself the task of planning the region's transportation infrastructure out to the year 2040. Unfortunately, what the public actually wants and needs in its transportation system is not what the plan provides in any of its various alternatives. Instead, the PSRC presents a planner's utopian vision that assumes people can be forced to abandon the convenience of their automobiles, be forced to live in dense urban areas, and made to ride public transportation. The PSRC has the arrogance, in plans increasingly disconnected from reality, to dictate that people must change their very way of living to conform to the PSRC's vision of this new, government-controlled future.

This is a direct affront to the Washington State constitution which holds that: "All political power is inherent in the people, and governments derive their just powers from the consent of the governed, and are established to protect and maintain individual rights."

When the people of the region are asked what they personally need in transportation infrastructure, the predominant answer is *congestion relief*. None of the Transportation 2040 alternatives provides this. Even Alternative 2, which builds the most new lane miles, does not come close to providing the capacity necessary to relieve congestion over the next twenty-five years. This, despite the fact that studies by the Reason Foundation and by Kemper Freeman Jr. show that the needed lane miles can be built at a fraction of the cost being spent on public transportation projects such as light rail.

For example, the Reason study shows that the Seattle area could actually *reduce* congestion by adding as few as 704 lane miles to the existing roadways over the next 25 years, at a cost of \$4.8 billion in today's dollars. The report noted that that this investment would save 200 million hours of delay per year that would otherwise be spent stuck in traffic.

But the PSRC is on a different track. They believe that the solution to congestion is to get people out of their cars. The goal is to reduce vehicle miles traveled by 50% by 2050. To do this they propose to make it very difficult to drive anywhere. Major roads will be electronically tolled, with higher rates to discourage driving at peak traffic hours. Gasoline will become very expensive with the imposition of increased taxation or Cap-and-Trade costs. Cars will cost thousands more due

to ever increasing mileage and emissions requirements. City parking will be eliminated. New bridges and tunnels will have no more capacity than the infrastructure they replace.

But will any of this work? History resoundingly says no. The region, like much of the country, has neglected road building for the last 30 years. The funds have been diverted, instead, toward public transportation. The somewhat ironic result is that public ridership has actually gone down, from about 6% of trips to less than 3% in the last 20 years. And studies show that the failure to upgrade the highway system hasn't achieved the goal of fewer cars on the roads, it has simply induced congestion on major highways and forced cars onto secondary streets. PSRC seem to be having a hard time understanding that public transportation simply doesn't work for most people.

The draft EIS also needs to include new, credible information that questions the need to reduce man-made carbon dioxide. Over 30,000 reputable scientists have signed a petition saying: "There is no convincing scientific evidence that human release of carbon dioxide, methane, or other greenhouse gases is causing or will, in the foreseeable future, cause catastrophic heating of the Earth's atmosphere and disruption of the Earth's climate." The latest IPCC data shows the worldwide temperature to actually have decreased over the last decade, with no end in sight, in direct relationship to solar activity, not the rising carbon dioxide levels. And, in any case, the developing countries are producing carbon dioxide at a rate that makes U.S. reduction attempts meaningless. It is completely irresponsible for the Draft EIS to ignore this information. (Likewise, contrary to the conventional wisdom of the EIS, there is little hard science to connect stormwater runoff with actual biological harm to Puget Sound.)

In the light of evidence that the PSRC planning process is actually working against its stated purpose of promoting the well-being of people, it would be reasonable to request that the entire PSRC planning process be completely reevaluated. But, for the purpose of commenting on the Draft EIS, at a minimum it is necessary that the document be revised to include an alternative that will actually relieve congestion; and be revised to include credible, readily available information that shows that the conventional view of carbon dioxide causing climate change may well not be valid.

This summary addresses only two of the many problems inherent in the Transportation 2040 DEIS. The main body of comments which follows discusses how the incomplete and biased premises assumed by the PSRC in the logic of their planning process lead to wrong conclusions about the transportation system needed for the future. Comments are then provided on the individual sections of the DEIS document that evaluate each of the wrong conclusions reached by the PSRC.

**Comments on PUGET SOUND REGIONAL COUNCIL (PSRC)
TRANSPORTATION 2040 DRAFT ENVIRONMENTAL IMPACT
STATEMENT (DEIS)**

*Prepared by Kitsap Alliance of Property Owners
July 21, 2009*

The comments provided herein are applicable to the DEIS for Transportation 2040 and are formatted in a general overview response to the general philosophy inherent in Transportation 2040 followed by an item specific set of comments on the plan. The two segments are complimentary in that they address both the philosophy behind Transportation 2040 and the specifics of the implementation of that philosophy. The two comment sections should not be taken to be in conflict with one another on any itemized comment or to be contradictory in any manner.

General Overview of Transportation 2040 from a historical Transportation Planning viewpoint.

The decisions about the transportation infrastructure being introduced in Transportation 2040 will determine the region's ability to support a vibrant economy and provide people with the mobility essential to a high quality of life over the span of the next 30 years and beyond.

Experienced economists and pragmatists know how difficult it is to look three decades into the future and how few predictions actually become reality. Nevertheless, transportation planning in the U.S. and in Washington State was reasonably successful in meeting society's needs in the not too distant past. However, more recent planning efforts, which deemphasized building new highways, have not achieved the same success and have, instead, resulted in major traffic congestion problems. Thus, it is essential to examine the parameters and assumptions underlying the current Transportation 2040 analysis to see if they will support a successful planning effort, or whether they will result in a continuation of unsatisfactory outcomes. The reality of any valid planning requires that a specific problem definition be determined so that a proper solution may be crafted.

A review of the Transportation 2040 Draft EIS suggests that the underlying premises are incomplete and are strongly biased to ensure a predetermined range of outcomes that continue to favor public transportation over the construction of highways. Based on the results of a similar planning approach,

in the more recent past, it is not clear how the current PSRC plans will produce a different outcome.

In planning, it is essential to incorporate some basic principles and realities involving our culture and the needs of the people of the region. The overwhelming majority of citizens in this region favor traditional modes of transportation (Private automobiles) and continue to drive to their destinations. People also are comfortable with traditional transportation funding methods. Thus, it would seem clear that there needs to be an EIS alternative plan that represents a continuation of these basics. Such an Alternate is not evident in the proposal.

The EIS assumes that the growth strategy of PSRC's Vision 2040 will prevail and that its land use policies will influence or mandate the transportation plan. Vision 2040 has a number of assumptions such as: The region's population will increase from 3.5 million residents in 2006 to nearly 5 million by 2040. Employment will increase from 1.9 million jobs in 2006 to over 3.1 million by 2040. Housing stock will increase from 1.5 million units in 2006 to 2.3 million units by 2040. There was no factual basis presented for those estimates and assumptions when Vision 2040 was drafted. The population, employment, and housing projections, critical to the success of Transportation 2040, do not gain validity just because they are written in to Vision 2040. Those projections remain highly questionable.

All the EIS alternatives assume that the land use planning policies of VISION 2040 will become reality and be continued into the future. These policies direct a major portion of new development into communities with regional growth centers; substantially reduce new development in rural areas and on the urban fringe; and allocate the majority of the region's employment and housing growth to metropolitan cities and core cities. However, as history shows, there is no certainty that these policies will actually come to pass. It is likely that economic and societal pressures beyond the control of PSRC will work to shape the region much differently than envisioned by the EIS and Vision 2040.

History has clearly demonstrated the unique ability of humans to resist and then thwart the best laid plans of politicians when those plans conflict with personal desires. Social engineering has yet to succeed in the United States. Therefore, there needs to be a broader vision of the future of transportation, one which is based more realistically on what is actually occurring in the region rather than what is hoped for. A transportation plan alternative is needed that reflects this more traditional evolution of growth.

Flexible planning should also allow for unanticipated change. Decisions that are essentially political in nature, that is to say bedded in one political philosophy or another are subject to major and unexpected reversal. Planning must recognize the political component of policies. For example:

- Petroleum based energy use may increase rather than decrease over time.
- The cost of oil-based energy may decrease rather than increase over time.
- Local air quality in the region may continue to improve over time using traditional fuel sources and clean emissions technology.
- Air quality may be more impacted by the prevailing air flow from developing economies along the Asian rim than from local emissions.
- CO2 may not be appreciably affecting climate change (this is what recent scientific evidence indicates).
- Washington's poor business climate may not support the EIS growth projections. The anticipated jobs and attendant population may likely go elsewhere where conditions are more favorable. (WA has a B&O tax that is found nowhere else; there is no "right to work" legislation enjoyed in 22 other states; WA resists frivolous lawsuit tort reform; WA has overreaching environmental regulations not found in many states, such as the Growth Management Act (GMA)--and the threat of new regulations such as Cap-and-Trade; WA has complicated, expensive and time-consuming permitting requirements unlike many other states.)
- Assume future planned extensions of the Light Rail System are shelved and the billions that would have been spent in cost and debt service are redirected into adding Capacity to the Freeways, Principal Arterials, and Urban Arterial systems. (Adequate parallel arterial capacity is lacking in all current Alternatives).

The various alternatives presented in the EIS propose to manage congestion through Demand Management, System Management, and Congestion Management strategies. But this isn't the only solution. There needs to be an alternative that solves the congestion problem by building the needed lane miles in a future that doesn't have these onerous highway controls. Such a road building approach (assuming a Level Of Service "B") will likely turn out to be the best alternative to achieve the Vision 2040 goals that envisions a safe and efficient transportation system essential to the quality of our lives; one that supports the regional growth strategy and serving as the backbone of the region's economy. A system that improves mobility while growing to a region of 5 million people.

All the EIS alternatives assume that gas tax funding will be replaced by a regional electronic toll system. This is primarily based upon the argument that climate change will benefit from non-carbon based vehicular energy systems. However, such an assumption is not applicable to an alternative that builds the lane miles needed to reduce congestion and anticipates future growth in conventional vehicle miles traveled. Under this alternative, the revenue stream would be based upon how much of his/her fair share of the cost each citizen pays to use the transportation grid – under a scheme that could resemble the following:

- Mass transit users pay a tax for PMT (personal miles traveled) calculated on origin and destination ticket sales.
- Electronically toll alternative energy vehicles only to make up for the fuel tax they are not paying, or be assessed PMT charges based on DMV (Department of Motor Vehicles) calibrated electronic odometer 'flyby' sensors similar to etoll technology.
- Abandon HOT lane systems. (These being unnecessary with Level Of Service "B" capacity for generally unimpeded traffic flow on arterial roadways).
- To compensate for increased fuel efficiencies and lower fuel prices, increase gas tax charges to reflect the traditional 3% average annual household budgetary cost for gasoline fueled automobile users.
- Re-establish the gas tax revenue expenditures for infrastructure use only.

It would seem obvious that the transportation system of the future should be based on the preferences of the people using the system and the advantages actually offered by technology improvements that occur over time. With respect to technological breakthroughs, it will be the free market system and the opportunity for reasonable return on investment that drives those changes. While there have been significant technological advances in some government programs the cost of those programs is prohibitive for the end results desired. The profit motive will prevail and provide sufficient incentive for research and development of promising technologies. Transportation 2040 must not direct or mandate the implementation of specific technology, such as electric vehicles, but, instead, anticipate customer-driven technology.

Plans that propose to dramatically convert our transportation system into one that tightly constrains personal mobility should be resisted. There are lessons to be learned from other experiments that emphasized highly-subsidized mass transportation over personal vehicle travel. The results have generally proved to be neither economical or beneficial.

Our culture is largely one of personal freedom and the automobile is symbolic of the freedom of mobility. It is a fact of life that public transportation simply doesn't work for most people. It is important to recognize that tax subsidized mass transit cannot provide for the routine transportation needs of most people under the best of circumstances. In time of economic hardship, as we are experiencing now, transit service cuts are the norm and that would leave large parts of the population without service and basically isolated in their homes. That is not a valid social or economic policy. An alternative that more closely matches public needs and our current transportation culture would clearly seem to be required.

Detailed comments on the specific contents of Transportation 2040 DEIS

The comments that follow are the result of a detailed review of the subject Transportation 2040 DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS), Destination 2030, Vision 2040, RCW 36.70A GMA and other associated legislative and Executive actions taken during the 2009 Legislative session.

1. The Transportation DEIS offers itself as a strategic planning document to answer the question *“How can the region best provide the mobility required to support a growing population to the year 2040, sustain the region’s environment and economic vitality, improve system safety and efficiency, and enhance the region’s overall quality of life?”* In fact, the content and process undertaken to prepare Transportation 2040 may be directed by STATE ENVIRONMENTAL PROTECTION ACT (SEPA) but the subject matter and content of the DEIS is not. The creation of the transportation plan that will be set forth in Transportation 2040 is to be developed under the parameters of RCW 36.70A Growth Management Act. Transportation 2040 is not intended to be an overriding strategy or plan that guides land use decisions but to satisfy only one of 14 goals and priorities guiding those decisions. Simply put, land use development decisions under GMA will determine the overall composition of a coordinated transportation plan, not the other way around.

2. Essential to any strategic plan development and to this DEIS is a preliminary statement of facts and assumptions upon which the plan will be built. There is no clear statement of either facts or assumptions that could be located in the DEIS. Lacking a clear statement of these foundation elements, there is no clear manner to properly “test” and analyze the options being presented. If it is the understanding of the planners that the population growth and job growth estimates of OFFICE OF FINANCIAL MANAGEMENT (OFM) are to be considered as fact, there is no analysis of past predictive accuracy to substantiate that position. If the planners are operating with the understanding that “climate change” is a certainty and that the ongoing legislative actions and agency regulatory efforts are valid as long range certainties, there is no documentation as to the specific impacts on economic development, energy provision for the area, and transfiguration of transportation vehicles or modes that would impact the plan. In fact the plan appears to be devoid of much imagination or planning aside from automobile trip reduction, increased biking and walking, and increased use of mass transit.

3. During the 2009 legislative session several bills were enacted that have major impact on the transportation planning within the horizon of Transportation 2040. For example:

SECOND SUBSTITUTE HOUSE BILL 1481– Electric Vehicles. This Law requires certain higher population areas of the state, including the PUGET SOUND REGIONAL COUNCIL region, to plan for, seek funding, and install and

operate infrastructure that will support electric cars. The first targets are government facilities followed by commercial and residential areas. Roads, starting with I-5, I-90, I-405 and 520 and the towns and cities along those routes, will fall under the requirements. The State fleet will have to complete a rather rapid turnover to electric or bio-fuel vehicles. Where the technology comes from, who produces the equipment required, and how this is all paid for is not addressed in Transportation 2040. There is no proposal in the Plan that has electric vehicle support as its focal element. The pertinent portions of the legislation are included below:

*NEW SECTION. **Sec. 1.** The legislature finds the development of electric vehicle infrastructure to be a critical step in creating jobs, fostering economic growth, reducing greenhouse gas emissions, reducing our reliance on foreign fuels, and reducing the pollution of Puget Sound attributable to the operation of petroleum-based vehicles on streets and highways. Limited driving distance between battery charges is a fundamental disadvantage and obstacle to broad consumer adoption of vehicles powered by electricity. In order to eliminate this fundamental disadvantage and dramatically increase consumer acceptance and usage of electric vehicles, it is essential that an infrastructure of convenient electric vehicle charging opportunities be developed. The purpose of this act is to encourage the transition to electric vehicle use and to expedite the establishment of a convenient, cost-effective, electric vehicle infrastructure that such a transition necessitates. The state's success in encouraging this transition will serve as an economic stimulus to the creation of short-term and long-term jobs as the entire automobile industry and its associated direct and indirect jobs transform over time from combustion to electric vehicles.*

*NEW SECTION. **Sec. 2.** (1) A regional transportation planning organization containing any county with a population in excess of one million in collaboration with representatives from the Department of Ecology, the Department of Community Trade, and Economic Development, local governments, and the Office of Regulatory Assistance must seek federal or private funding for the planning for, deployment of, or regulations concerning electric vehicle infrastructure. These efforts should include:*

(a) Development of short-term and long-term plans outlining how state, regional, and local government construction may include electric vehicle infrastructure in publicly available off-street parking and government fleet vehicle parking, including what ratios of charge spots to parking may be appropriate based on location or type of facility or building;

(b) Consultations with the State Building Code Council and the Department of Labor and Industries to coordinate the plans with state standards for new residential, commercial, and industrial buildings to ensure that the appropriate electric circuitry is installed to support electric vehicle infrastructure;

(c) Consultation with the Workforce Development Council and the Higher Education Coordinating Board to ensure the development of appropriate educational and training opportunities for citizens of the state in support of the

transition of some portion of vehicular transportation from combustion to electric vehicles;

(d) Development of an implementation plan for counties with a population greater than five hundred thousand with the goal of having public and private parking spaces, in the aggregate, be ten percent electric vehicle ready by December 31, 2018; and

(e) Development of model ordinances and guidance for local governments for siting and installing electric vehicle infrastructure, in particular battery charging stations, and appropriate handling, recycling, and storage of electric vehicle batteries and equipment.

SUBSTITUTE SENATE BILL 5921 - Clean Energy Leadership Initiative – This law declares, by simple statement, that Washington is the leader in clean energy and then establishes a “commission” to make that “fact” reality. The population of the Governor’s commission is such that the intrusion of opposing viewpoints is improbable. More significant, the impact on economic growth and energy production in the state, short term and long term, will be significantly controlled by this policy. The ability to execute any of the “options” under Transportation 2040 must recognize the impacts of this policy and meet the basic energy related requirements of this policy. It is not apparent that this law has been considered as a primary controlling factor in creation of the 2040 options. The pertinent portions of the law read as follow:

Sec. 1. *The legislature finds that Washington is recognized as a leader in sustainability and climate change and has the foundation to become a leader in the clean energy technologies, products, and services that will be required throughout the world to provide reliable and reduced-emission energy. However, to become a leader, Washington will need policies and strategies to develop new clean energy technologies, attract federal and private investments, attract and grow clean energy companies, and create green jobs. The legislature further finds that positioning Washington to be competitive for federal and private sector clean energy investments will require collaboration between Washington's state agencies, clean energy technology companies, research institutions, national laboratory, and workforce development system to identify our strengths and develop the requisite policies and strategies.*

It is the intent of the legislature to create a clean energy leadership initiative that will set the path to leverage Washington's energy infrastructure and make Washington a hub for clean energy technology and a leader in the creation of green jobs and the development, deployment, and export of clean energy technologies and services.

SB 5735 Reducing Greenhouse Gas Emissions – This is the cap and trade bill that is little more than a “ponzi” scheme under which the state sets standards and then acts as the bank for the carbon trade. The primary issue is that under this bill there is no actual reduction in emissions. This is only a mandated revenue

stream for government with the bill being passed to the consumers. In most cases the cost effect will be unavoidable (electric power generation, oil refinery) and the consumer will bear the direct cost of the program. If any part of the revenue generated by this “Cap and Trade” process is devoted to transportation improvement, it is not clear.

ENGROSSED SECOND SUBSTITUTE SENATE BILL 5560 Agency Climate Leadership – In this law, every state agency is tasked to demonstrate positive leadership in the climate change area. They are responsible for actions within the agency and for those areas under the agency responsibility. They need an action plan/strategy, monitoring and reporting. The emissions reductions placed on agencies are more restrictive than for the general public but, as PSRC is dealing with mass transit systems that are effectively government agencies, those limits should be factored into the plan. There is no clear evidence that the provisions of the law have been properly considered in the plan. The pertinent portions of the law are detailed as follows:

Sec. 1. *The legislature finds that in chapter 14, Laws of 2008, the legislature established greenhouse gas emission reduction limits for Washington state, including a reduction of overall emissions by 2020 to emission levels in 1990, a reduction by 2035 to levels twenty-five percent below 1990 levels, and by 2050 a further reduction below 1990 levels. Based upon estimated 2006 emission levels in Washington, this will require a reduction from present emission levels of over twenty-five percent in the next eleven years. The legislature further finds that state government activities are a significant source of emissions, and that state government should meet targets for reducing emissions from its buildings, vehicles, and all operations that demonstrate that these reductions are achievable, cost-effective, and will help to promote innovative energy efficiency technologies and practices.*

Sec. 2. *A new section is added to chapter 70.235 RCW to read as follows:*

(1) All state agencies shall meet the statewide greenhouse gas emission limits established in RCW 70.235.020 to achieve the following, using the estimates and strategy established in subsections (2) and (3) of this section:

(a) By July 1, 2020, reduce emissions by fifteen percent from 2005 emission levels;

(b) By 2035, reduce emissions to thirty-six percent below 2005 levels; and

(c) By 2050, reduce emissions to the greater reduction of fifty-seven and one-half percent below 2005 levels, or seventy percent below the expected state government emissions that year.

(2)(a) By June 30, 2010, all state agencies shall report estimates of emissions for 2005 to the department, including 2009 levels of emissions, and projected emissions through 2035.

(b) State agencies required to report under RCW 70.94.151 must estimate emissions from methodologies recommended by the department and must be

based on actual operation of those agencies. Agencies not required to report under RCW 70.94.151 shall derive emissions estimates using an emissions calculator provided by the department.

(3) By June 30, 2011, each state agency shall submit to the department a strategy to meet the requirements in subsection (1) of this section. The strategy must address employee travel activities, teleconferencing alternatives, and include existing and proposed actions, a timeline for reductions, and recommendations for budgetary and other incentives to reduce emissions, especially from employee business travel.

HOUSE BILL 2129 Greenhouse Gas Emissions – This act reinforces the Utilities Commission role in approving development of electrical generation plants or purchase of generated electricity. The act reinforces the citizen actions of I-937 regarding definition of renewable energy sources. The ability of electricity generation companies in the state to employ other than clean and renewable energy sources is severely restricted. In that approximately half of the state's power is hydroelectric (classed as non-renewable), and about forty percent is from nuclear or hydrocarbon fired plants, the opportunity to significantly expand power generation may be questionable. The ability to make that expansion near term is highly unlikely considering the lack of storage capacity and the lack of transmission facilities to reach "renewable" energy target development areas.

SENATE BILL 5540 High Capacity Transportation Service - It would appear that PSRC would benefit from this law. However, the recent lack of interest by voters in King County to support transportation bond issues (one of the actual driving factors behind the creation of Transportation 2040) it is not certain how this authority might be used. It should be noted that, as the result of other legislation, Kitsap County is not included in the King, Pierce, Snohomish MTPo and that, according to US Bureau of Census, Kitsap is not a part of the Seattle/Everett or Seattle/Tacoma metropolitan areas. There is significant doubt that citizens of Kitsap would tolerate a bond issue to pay for "transportation" projects in either of those districts or a PSRC High Capacity Transportation Corridor. The pertinent portions of the law are as follows:

(1) "High capacity transportation corridor area" means a quasi-municipal corporation and independent taxing authority within the meaning of Article VII, section 1 of the state Constitution, and a taxing district within the meaning of Article VII, section 2 of the state Constitution, created by a transit agency governing body.

(2) "High capacity transportation system" means a system of public transportation services within an urbanized region operating principally on exclusive rights-of-way, and the supporting services and facilities necessary to implement such a system, including interim express services and high occupancy vehicle lanes.....

Although not passed by the legislature, the elements of **SENATE BILL 5735** Reducing Greenhouse Gas Emissions were implemented by the Governor through Executive directive. The actual implementation of the actual cost (tax) system will require legislative action but that will not be far behind. This is the cap and trade bill under which the state sets standards and then acts as the bank for the carbon trade. The primary issue is that under this bill there is no actual reduction in emissions, this is only a mandated revenue stream for government with the bill being passed to the consumers. In most cases the cost effect will be unavoidable (electric power generation, oil refinery) and the consumer will bear the direct cost of the program. In view of the problems already associated with providing for the energy needs to support both Vision 2040 and Transportation 2040 (all options) this action needs to be clearly addressed in Transportation 2040.

4. A simple analysis of the energy related issues as required by emissions standards established by law, requirements for electric vehicles, and the increase in region transportation needs appropriate to the projected population and economic growth produces a conundrum not addressed in the Transportation 2040 plan.

Population data (US Census Estimates 2008)

King	1,875,519
Kitsap	239,769
Pierce	785,639
Snohomish	683,655
Total	3,584,582

Miles per person (2007) = 8,697 (WADOT Figures)

Miles in PUGET SOUND REGIONAL COUNCIL - 31,175,109,654 miles per year

Gasoline consumption @30 MPG =1,039,170,321 gallons per year (US CAFÉ standards)

Assuming no major scientific breakthrough to reduce the outcome of the hydrocarbon oxidation process, the equivalent gasoline quantity that would support the reductions required by law in year 2020 (about 16 percent) and 2035 (about 36 percent) would lower miles driven to 26,187,092,109 (2020) and 19,952,070,178. That reduction, in turn relates to removing 537,533 vehicles by (2020) and about 1,290,450 vehicles by 2035. Unfortunately, while the reduction from the 2007 base is in progress, population increases continue and with them the need for vehicles. With a growth of 1.5 million people in the horizon period and using the same PRIVATELY OWNED VEHICLE (POV) to individual ratio existing today, the numbers are much higher. Using a straight line growth

estimate within the horizon period an additional 50,000 cars per year would have to be entirely eliminated to meet the emissions reduction criteria.

The effective elimination of approximately 115,000 emission creating vehicles per year and replacing their transportation capability with non-emitting vehicles is not addressed. The number of electric or hybrid vehicles required, on an annual basis, is approximately one-half the current world production of those vehicles that might serve as substitute vehicles. The current and forecasted availability of the raw materials for Lithium-Ion batteries, the current power storage devices for electric and hybrid cars, does not support a massive increase in production of either batteries or vehicles. In addition, the current supply of those materials on the world market is primarily from China and Argentina, not necessarily strong trade or defense allies of the United States. How PSRC is to meet the objectives and at what cost, while in competition with the rest of the state and the rest of the nation, is not identified in the plan.

In addition to the simple logic of direct vehicle replacement there is the issue of a replacement energy source. One gallon of gasoline equates to 33.4 KWH of electricity. To replace the approximate 33 millions of gallons of gasoline saved each year will require about 1,113,000,000 KWH of electricity (1,113,000 MWH) In 2007 the entire electricity production for the state was 106,990,217 MWH with less than 3 percent from wind, solar, or similar non-emitting sources. (Hydro power was not considered because it is already classified non-renewable). The bottom line is that to replace energy for transportation needs, the PUGET SOUND REGIONAL COUNCIL region will need an increase of non-emitting energy sources that essentially exceeds current capacity. In that the same time frame electricity sources will be required for general population support and economic development, it is difficult to comprehend how the energy needs will be met to sustain any of the 2040 options.

Finally there is the issue of personal choice as demonstrated over the past 30 or so years. The US automotive market has always had available one or more lines or models of cars that traded size for fuel economy. In the mid-1970's during a major oil supply curtailment, a significant effort was made to shift the American car driver from "gas guzzler" to fuel efficient, high mileage vehicles. It did not work. The Ford Pinto, Chevy Vega, Pontiac Tempest, Fiats and Datsun's of all stripe, followed by Saturn, Honda, KIA, Hundai and a complete variety of fuel efficient vehicles from major manufacturers has not significantly modified the American choice for size, comfort, and safety on the road. The continued effort by planners to bring about a change in personal behavior is not only a continuing study in frustration, but a major divergence from the authority and responsibility delegated to our government. PSRC may be able to justify, in some manner, the ability to decide if roads will or will not be provided for citizens to use for personal transportation. PSRC does not have the moral imperative or the authority to decide what type of cars citizens will purchase and drive or how frequently or how far citizens will drive their cars.

5. Each of the options provided by Transportation 2040, except Alternate 5, requires a significant increase in road miles to meet future transportation needs. Numerous studies conducted outside the auspices of PSRC have estimated an additional 700 lanes miles are required to relieve road congestion in the Puget Sound Region. There is no mention of other studies of the congestion problem. Ignoring solid fact based data because it is inconvenient with an agenda or inconsistent with a desired outcome is not appropriate. The only valid reason to exclude other study results is hard evidence of major inaccuracy. That is not the case in this instance.

6. Chapter 3, Par. 2 – Ferry System. While the paragraph describes the system in generic terms it does not note the importance of the system to Kitsap County and the economic well being of the east Sound region. The ferry system provides the vital link for a highly trained and professional work force to commute daily between Kitsap and businesses in the east Sound. The ferry system is also a vital link for recreational activities of east Sound residents visiting the Kitsap and Olympic peninsulas.

7. Chapter 3, Par. 2 - Freight and Goods Systems. Ports – The port facilities in Sinclair inlet and bordering Rich Passage provide major economic benefit for Kitsap County and the Region. Puget Sound Naval Shipyard and Manchester fuel depot are major government facilities that clearly overshadow similar facilities in the region. Additionally the port facilities at Bangor and Keyport are of appropriate significance to be included in the list.

Airports – The extensive variety of small airports in the region should not go without notice. While there can be no doubt that SEATAC airport is a major facility and deserves appropriate attention, failure to identify the smaller facilities means that they will be overlooked in the transportation planning effort . By 2040 those smaller “local” airports will probably play a major role in transportation in the area and in the nation.

Railways – Kitsap Peninsula is served by the Puget Sound and Pacific Rail Road with trackage to South Kitsap Industrial Area (SKIA), Puget Sound Naval Shipyard, Bangor and points in between. The rail, owned by the US Navy is Class 1 or better trackage and offers significant opportunity for economic expansion in the area. Extension of trackage to North Kitsap could support Rail Diesel Cars (or similar) commuter trains in the county. The opportunity to provide cost effective service to North Mason and North Kitsap could reduce travel loads on local roads.

8. Chapter 3 Par. 2. – Transportation Demand Management Systems. While commendable, the concepts of shift scheduling, car pooling, bicycling, and walking as a means to make appreciable reductions in POV travel is not supported by a 15 year history of pushing those programs. As of yet, no government agency has made the case for the alternate means so strongly as to modify the behavior of a significant number of commuters. To continue to

consider the same failed concepts as a meaningful part of an effective program meets the definition of insanity. Short of physically denying people the ability to travel by POV, a simplistic, “appeal to reason” management system will not work. People like and desire to maintain the transportation flexibility and completeness offered only by a POV and no other means of travel.

9. Chapter 3, Par. 3. – What Changes.....? As a side bar to this section there is a note that identifies a number of funding methodologies that are considered in the options. Among those are tolling, user fees, ferry fares. Of note, there is no indication that any effort will be made to reduce the capital project cost or the operation and maintenance cost of any of the transportation elements under consideration in the options. The ability to fund through increasing the taxpayer “contribution” to the planned system assumes that first the taxpayer will stand still for the increased cost and second that the taxpayer will support the plan. Based on the overall fiscal awareness of taxpayers and their general rejection of placing additional funds in the hands of government, the rationale of plucking more dollars from taxpayers needs close reconsideration. If you maneuver so as to hold taxpayers hostage to the system, you may find an unusual and unpleasant reality in their reaction. In the previous comment on lack of assumptions, the assumption that funding would be available, not addressed until this section, is clearly not a valid or supportable assumption.

10. Chapter 3, Par. 5. – The listed “assumptions” for continued service in various categories or maintenance of capacity are not consistent with either plans already approved or working or plans on the drawing boards. Additionally, the funding to implement that maintained level of service is not identified. Since current funding levels are not sufficient to adequately maintain roads, bridges, and ferries, how will those funding requirements be met in the future? Please also note that there is no indication that increased capacity can be gained by elimination of off hour HIGH OCCUPANCY VEHICLE (HOV) restrictions. To the contrary, it appears that the restrictions will be continued so as to provide a future opportunity for tolling or user fees.

11. Chapter 3, Alternatives

-Alternative 1 System Efficiency. Reading between the lines on this option it appears that either legislative effort or other negative incentive will be employed to coerce employers to force employees into a less than optimal commute methodology. It is reasonably clear that jurisdictions will either eliminate core parking areas or make them effectively not available to workers. The offshoot will be a very large “underground” parking business that allows employees to park close to work. It is interesting that, in Kitsap, the single largest employer was so concerned about supporting the employees that the Navy constructed a major parking garage in close proximity to the yard in downtown Bremerton. Under this alternative that garage would not be allowed.

- Alternative 1 System Management. Intelligent technology and “system management” practices are only successful when the capacity of the road systems is adequate for the traffic load being managed. Otherwise the IT system is little more than a “traffic delay” process that may give an appearance of efficiency but delivers none. The current IT and management systems have not resolved or relieved congestion to any noticeable degree. More of the same will result in more of the same.

- Alternative 1 Strategic Expansion

- Roadways. Turning all of the HOV lanes in the region into HIGH OCCUPANCY TOLL (HOT) lanes does not increase effective road miles. That the primary recommendation is to charge taxpayers for continued inefficiency and delay is something only a planner could dream of.

- Transit. Once again the time honored but proven ineffective answer is brought to the fore. The use of transit in core areas with major penetration by routes and frequent service will provide an answer to some of the needs. However, as soon as the population begins to disperse by either origin or destination, the ability of transit to support actual needs falls off rapidly. Portland tried and failed to build a “transit centered” city as a major revitalization project. PSRC is trying to jam a similar failed effort into an area that is not being revitalized but just growing and growing. Bus systems and light rail cannot provide the required service in a cost effective manner. Consideration of federal funds to support inappropriate system expansion for the sake of having a transit system is also poor stewardship of taxpayer funds.

- Bicycle and Pedestrian. You can build all the bike trails and pedestrian walks you may desire without making a substantive impact on the transportation solution. However, if Seattle, Tacoma, Bellevue, Everett, and Bremerton are prepared to declare core areas as “no private vehicle” areas, make appropriate modifications to support major increases in transit, taxis, delivery vans and such, there could be a chance. Who wants to go first?

Alternate 2 The 2030 Reflection.

- Roadways. This plan, like its parent, is little more than a revenue generation scheme with considerable added cost to use existing roads with little benefit. Count this one as dead as Proposition 1 with the taxpayers.

- Transit. Once again, funding that should be dedicated to relieving congestion on roads or maintaining basic infrastructure is diverted to light rail. If light rail is such a good investment, why does it not enjoy a larger percentage of ridership in areas where it exists? If light rail is good, why are not busses better?

- Bikes and trails. Here we go again. Take a survey of the first 1000 people that you meet in South Center to determine how many arrive there by

bike or walking and for how many that is the preferred way to shop. Then go to Boeing and ask the same question. If walking is so neat, why do ferry system personnel have reserved parking spots at each of the terminal facilities? The alternate makes the following statement: "*Combining bicycle and pedestrian options with the expanded transit systems and more efficient roadways would provide significant improvements in access to housing and jobs*" Where is the specific proof for that statement? If we can't make it work at a High School how do we make it work with grownups?

-Funding, Kudos to the planner who wrote "*Alternative 2 would rely on significantly more traditional funding (gas tax, etc.)*" What a nice way to say we need to raise taxes to make this dream come true.

Alternate 3 – The Toll Road System. At least this option pulls no punches; 'Drive your car and pay'. There would be little or no opportunity to leave the driveway without completing a transfer of wealth to the government. Have to read real close though to find out what happens to the existing funding stream. "*Traditional revenues would fund other efficiency and management programs, including substantial bus service investments, strategic arterial roadway expansion, and new off-road trail infrastructure in the corridors connecting the regional centers to form a non-motorized Network*". Unfortunately, there is no mention of the Constitutional amendment necessary to squander gas tax and license fee dollars on trails and bike paths. How is that to be handled?

- Demand efficiency. At least the planners were honest enough to realize that if every road is a toll road, people might drive less. Of course they (and their businesses) might just decide to go somewhere else. That would also work to further reduce demand and congestion but might be a heavy hit in other areas.

- Transit. Not surprisingly, transit busses would be increased and flow along arterials (probably left vacant by drivers refusing to pay tolls). There is no assurance that the system will work however. In numerous instances where similar approaches have been tried, resourceful drivers have explored the potential of secondary roads and city streets and blazed entire new "routes" to overcome apparent government stupidity. The most recent case was in Poulsbo when POV commuters found a way around a congested HOV constrained Highway 305. Now the downtown area has stop signs bringing unnecessary congestion and traffic jams to downtown.

- Bikes and "Boots". "*Bicyclists would benefit from a completed network along the corridors that connect regional growth centers. Bicycle and car-share programs would offer more travel choices*" At this juncture it might be appropriate to fire either the planner who was raised and educated in Denmark/Sweden or the one who has stock in a bicycle company. It is time to take another survey to determine how many employees are actually going to ride a bike to work in the winter. You might also want to determine how many over the age of 40 plan to

use a bike as their primary means of transportation. If bikes are such a good idea, can we start by ending school bus service in metropolitan areas and requiring children 12 and older to ride bikes to school? Want to try that on the UW campus? It will be interesting to see the reaction to the “ride your bike” suggestion made by WADOT as a way to avoid the congestion created by the shut down of normal traffic lanes on the I-90 bridge for expansion joint replacement.

Alternate 4 - the “Why Bother” Plan. This one says it in a nut shell, Pay more get less and buy more busses and light rail. *“Roadway expansions in Alternative 4 would be limited to projects that relieve congestion at bottlenecks and chokepoints by using some of the revenue generated by tolls. Alternative 4 Transit New revenue (including some toll revenue) would be invested in transit service. Alternative 4 would implement ST2 plus extend light rail to Everett, Tacoma, and downtown Redmond. These expansions, and the better use of shared rights of way for Bus Rapid Transit (BRT), would combine to make the entire transit system more convenient for users and better integrated with roadway systems. Alternative 4 proposes to increase transit services on tolled corridors, including core and specialized service on routes where the use of tolling improves transit travel times.”* In short, this plan is drive less, pay more and buy busses. Just how this works to the benefit of taxpayers is not apparent.

- Ferries. To the planner that does not commute by ferry, a message. Car ferries carry large number of passengers. Passenger only ferries carry small numbers of passengers and, in general are not a value added for the system. A specific example of a value added passenger only ferry is Kingston to Seattle where no service exists and provision of commuter service could actually reduce congestion on Highway 305 on Bainbridge Island. Instead of Passenger only boats to Bremerton (the big driver) how about increasing boat capacity and rotating boats to provide 40 minute departures during rush hour. (Of course if Seattle makes downtown a no car zone the problem is solved. Another idea is to move a ferry terminal to Blakely harbor and provide direct rail service from Illahee or Manette to the ferry terminal.

- Bikes and Pedestrians. *“Toll revenues would be spent to complete bicycle and pedestrian connections to transit centers, rail stations, and ferry terminals. These investments would provide better access to arterial transit service, complete sidewalk systems and bicycle networks along corridors that connect regional growth centers, and provide more safety features at crosswalks. Cities with regional growth centers would work to provide better “end-of- trip” facilities such as locker rooms, storage, and secure bicycle racks.”* This idea is so bad that it barely deserves comment. The ultimate insult is to force a taxpayer out of their car or make them pay heavily for the “privilege” of using that car so they can pay for bike paths and locker rooms. Would someone please identify the exact section of the state constitution that delegates authority to the Legislature or any other jurisdiction to spend in this manner? If bike paths are

essential to the health of our community, let “Parks and Rec” foot the bill. How long will it be before we have to have skate lanes for high speed commuters?

Alternative 5 –The “Climate Change” Option. In reality, this is the preferred option for PRSC and will, considering recent legislation, be the only option that could even come close to meeting ENVIRONMENTAL IMPACT STATEMENT requirements. As noted in paragraph 3 of these comments, the stringent requirements of legislation regarding emissions reductions will require removal of approximately 115,000 emission producing vehicles from the road each year of the planning period. This is the only alternate that forces that change in behavior and enables the region to meet emission standards.

- Roadways. This alternate does nothing for roadways over the next 25 years. The plan to increase or finish HIGH OCCUPANCY VEHICLE (HOV) lanes and resolve certain “bottlenecks” would be more than offset by the forced reduction of vehicles using the roadways. The sole purpose for roadways is to force those without viable transportation options to subsidize non-self sustaining transportation for all others.

- Transit. Virtually all effort would be directed toward mass transit of one type or another. Rider ship would be forced. People would have no choice but to use what ever transit service was available regardless of price or time commitment. This alternate is predicated on a mandated behavior modification. There is a high probability that the adoption of this alternate will result in significant out migration of skilled professionals and business.

- Bikes and Pedestrian. This manner of transportation will now become a major element of the overall transportation plan. The time lost by commuters and the probable decrease in public safety will not be accepted willingly by consumers. Those who suffer mobility disabilities or who are very young or elderly will become a burden on the community and pose new challenges for the community at large. The actual loss of mobility of mothers with children will have a net negative effect on both the work force and parental involvement in community activities.

- Funding. The alternate requires replacing current funding sources and methodologies with an entirely new revenue generation stream. That action will require a constitutional amendment. The probability that a combination of tolling and revenue generated from user fees is unlikely to actually support the capital development and the out year operation and maintenance funding requirements. Mass transit has yet to demonstrate operation with a positive or, at least, break-even revenue to cost balance. Those systems have been and remain highly subsidized. Of course, once mass transit is the only real option available, user fees and tolls can be increased to the level necessary to make any fiscal balance necessary. How that is beneficial is not clear.

- Innovations. This alternate requires innovation in fuel sources and technological advances in order to achieve the objectives of the plan. The alternate does not explain what those “innovations” or “technology” breakthroughs might be or who is to bring them to fruition. It is difficult to perceive how these miracles of science will occur while industries are being restricted in both the energy availability and skilled labor that are an inherent part of this alternate.

12 Missing Alternates. At least two other alternate plans are missing. Either is viable, would resolve the problem postulated, and appear to be within the unwritten assumptions of the plan

Alternate X – Construct the necessary 700 lane miles on major arterials to relieve congestion. The studies are complete and the locations for additional lane miles have been identified. Funding for the alternate would come from existing taxes and fees with exceptional limitation on funds diverted to mass transit, walking paths, and bicycle lanes and facilities. This alternate appears to be most consistent with the authority delegated to government by the people, as set forth in the Constitution.

Alternate Z – Eliminate POV in major metropolitan areas. The Spokane area appears to be leading in this approach, at least in being truthful about the desired outcome. Their current plan to eliminate cars is clearly identified as such. This alternate would use Seattle as the “poster child” for the project. All POVs (less delivery vehicles and some strictly routed through traffic) would be eliminated from surface streets from Lake Union to SODO District and from 6th Avenue to the waterfront. Additional mass transit service would be provided. Current streets would be converted to boulevards with appropriate center landscaping, bike lanes, and pedestrian walks. Moving sidewalks should be considered for the longer walks in the area. Escalators to facilitate the “hill climb” from Alaskan Way to 6th Avenue should also be considered. This alternate would require major “park and walk/bike/ride” lots on the fringes of the area. Those lots could provide major revenue for the “car-less core” project. Limited through transit lanes for ferry vehicular traffic, to move between Coleman Dock and PRIVATELY OWNED VEHICLE accessible areas would be necessary. Perhaps the current Spring Street route to access I-5 and the existing I-5 access to the terminal would suffice. This alternate has the attraction of facilitating the transfer of transportation from PRIVATELY OWNED VEHICLE to other “more desired” means. It also provides an early opportunity to assess the acceptance of the ultimate goal of a “car free” system with those who live, work, and shop in downtown Seattle as well as compatibility with the business plans of the many businesses located in that area.

13. Chapter 3, Par. 11. How the alternates were developed.

Reading this section might lead one to believe that any and all parties or groups that had been involved, over time, in PSRC transportation planning might have

been involved in this current work. That is not the case. This organization, KITSAP ALLIANCE OF PROPERTY OWNERS (KAPO), has been deeply interested in the entire PSRC planning process and has made significant comment and input on Destination 2030, Vision 2040 and associated documents. KAPO was unaware of the Transportation 2040 alternate development and the preparation of the DEIS. It is reasonably clear that this document and the underlying effort is a staff creation assisted by associates selected by staff. This document cannot be represented as a product of open public development.

14. Chapter 3, Alternate Testing

That the PSRC staff conducted some level of alternate testing using an in-house developed modeling system does not give great credence to the process or the results. Because the integrated land use and travel model effort has a predetermined outcome of favoring mass transit, walking, bicycling, and virtually any other transportation method other than PRIVATELY OWNED VEHICLE/SINGLE OCCUPANCY VEHICLE (POV/SOV) there should be little doubt as to the end result. In that the land use plans employed are those directed by Vision 2040, a set of policies that were essentially created to support mass transit, it would be incredulous that any other result was achieved. The system of metrics and measurements to be used to determine the “effectiveness and achievement” of Transportation 2040 selected alternate are in fact, the ability of that plan to continue the forced land development policies of Vision 2040. That is hardly an unbiased “testing” procedure. The system did not properly consider the actions of the legislature. It is highly likely that not one of the alternates offered and “tested” will satisfy the actual requirements of current law.

15. Alternate Analysis results Chart.

This is one of the finest examples of manipulation of a data set to achieve a desired result. Take for example under Alternate 5 there will be a massive “Travel time saved” as compared to Alternate 1. With Alternate 1 most closely resembling today and Alternate 5 representing a future of bliss in mass transit. If total commute travel time today by mass transit is approximately twice that for travel by SOV, and if there are no major road improvements under Alt 5 which is mainly a mass transit expansion, how can that figure be real? Also interesting is that Alternate 5 accrues the best benefit for stationary vehicle emissions which has to be a marvel of science unless all vehicles are non-emitting. Finally, several alternates appear to have a positive benefit in the category vehicle and building energy use. Since that is not quantified there is some doubt that the finding is actually objective in nature. The total presentation by the chart is bewildering in that there is no explanation of the elements used for testing, the relative values assigned to each element, and a manner in which to assess the outcome of the testing process.

16. Potential impacts on delay of Transportation 2040.

The opening statement certainly strikes fear into the heart on any solid citizen. Imagine that not approving this overarching government plan timely and as

presented might hamper completion of not only this plan but also another plan that was adopted a year ago. The first question must be “if last years plan needs this plan, why is it so late and holding up the effort of the previously adopted plan? To be more specific, the following “impacts” make little or no sense:

“Failure to implement a key component of VISION 2040, the region’s long-range vision for managing growth” Vision 2040 is a comprehensive set of planning policies that are available as guidance and not mandatory for adoption by any jurisdiction within PSRC. It is not clear how a delay in or not adopting Transportation 2040 would result in “failure to implement Vision 2040.

“Delays in implementing transit, nonmotorized, and other project types that have environmental benefits” The policies in Vision 2040 include encouragement for individual jurisdictions to incorporate these types of transportation projects in their land use planning. With or without Transportation 2040, that planning can go forward.

“Impacts on achieving economic development goals including affordable and convenient housing opportunities.” The planners may be able to demonstrate through their modeling how Transportation 2040 will, near term, have impact on either economic development or affordable housing but it is doubtful. This process has been ongoing for over 20 years with little or no measurable positive impact directly attributable to either land use or transportation planning. To the contrary, there are considerably more instances on record that document loss of business opportunity and regulatory impact on housing that resulted in artificial inflation of home prices out of the affordable range.

“Risk in delaying or receiving a reduced amount of federal funding” Finally there is a reason that is clear and honest. If the Plan is not allowed to move forward promptly the potential loss of funding is increased. That it might be better to actually permit detailed study of the problems we are trying to solve and to permit open debate on potential solution is apparently not as important as getting the almighty federal funding.

“Higher construction costs due to inflation” This reason is enough to make almost any taxpayer chuckle. The same bureaucrats that consistently use sales tax on road construction projects to move funding from the road account to the general fund are worried about inflation. How quaint.

17. Chapter 4, Transportation

Chapter 4, Par 1- The following statement, included in the introductory section of this chapter is the key to the success of both Transportation 2040 and Vision 2040. *“The multicounty planning policies serve as the “Regional Principles and Guidelines” for local comprehensive plan review and certification required for regional transportation plans under the Revised Code of Washington (RCW)*

47.80.026. Hence, these policies guide Transportation 2040.”In fact, as determined in the review and adoption of Vision 2040, that document was based on land use provisions incorporated to satisfy predetermined transportation parameters. To attempt to now justify Transportation 2040 as a result of or in support of Vision 2040 is blatantly dishonest.

Chapter 4, Exhibit 4-1. The deep water ports in Bremerton and Manchester are not identified. The regional airport at Bremerton (Bremerton National Airport) is not identified. These omissions are significantly surprising as a Bremerton Port Commissioner is a voting member of PSRC.

Chapter 4, Exhibit 4-3. The explanation is misleading. The national Interstate Highway system was created as a national Defense Highway System and continues in that role. The priority for maintenance and expansion of the system in Washington must naturally be directed toward the movement of defense related materials and personnel to meet national emergencies. The roads linking Ft Lewis, McCord, Puget Sound Naval Shipyard, NSB Bangor, NUWC Keyport, Port of Seattle, Naval Base Everett, and by extension, NWS Indian Island, and the portions of I-90 from Seattle to the Yakima complex are key elements of that system. The defense nature of the nuclear complex at Hanford would also include interstate system links to that facility. Unfortunately, the priority for defense use is not reflected in the Plan.

Chapter 4, Exhibit 4-4. The “Freeway High Occupancy Vehicle (HOV)” lane system was initially intended to encourage carpooling. In virtually every state that has HOV Lanes on the Interstate highways (not all do have HOV lanes), those lanes are restricted use only during peak commuter hours. At all other times the lanes are open to all traffic. That is consistent with the initial purpose of the lanes, as explained and justified to the American taxpayer when they were forced to pay for those lanes. Of note, several states have “turnpikes” or other toll roads that were paid for by state funds, operated and maintained by state funds. Washington has the same opportunity but the proposal never seems to receive approval from the voters. To “convert” the interstate system to a set of toll roads in the name of improved service is contrary to the initial purpose and funding of those roads and is little more than an attempt to coerce and mislead the taxpayers.

Chapter 4, Par. 5. This section intends to provide a description of the existing “transportation providers and services in the region”. The language is complimentary where the service is appropriate to the designs of the Plan but less than complimentary when the service is not consistent with the predetermined outcomes. For example, there is no information on the actual use of transit systems and the cost per operational mile for the systems. The only way that transit systems can be considered fairly as part of the mix is by understanding the cost to move people over actual system miles traveled and then to include the time, cost of money and other costs associated with moving

people in areas not served. There can be no doubt that a bus, filled to capacity, will probably be more cost effective than a SOV covering exactly the same route. However, if the bus takes twice as long to cover the route, the cost of rider time must be properly factored into the overall cost equation. In addition the cost of the bus to run empty to the start of the run from the barn and to return to the barn must also be considered. Because bus service is limited with respect to area coverage and times of service, every opportunity lost because of not providing a service must also be factored against the bus system. If a person is required to use an alternate means of commuting, because transit is not reasonably available that is not a cost associated with using the alternate but a cost charged, at least in part, to the transit system for not being available.

Of note, the park and ride capacity of 38,000 spaces, without regard to location is a clear indicator that the POV use is essential to the successful operation of the mass transit systems. If the number of cars required to be removed from service for commute is correct, the number of park and ride (P&R) slots will need to increase by about 100,000 per year. That cost does not appear to be factored into the Plan. In addition, the number of transit units and the frequency of service will also have to increase. It is not clear how that is provided for in any of the alternates. Finally, because of the “electric vehicle” mandate, all P&R facilities will have to include direct support for electric vehicles. That does not appear to be included in the plan.

The discussion of the “rapid transit” corridors, as provided for in recent legislation, does not clearly indicate how those corridors will be established. If the transit vehicles dedicated to those corridors are required to use existing road or rail lines, it is difficult to understand how “rapid” can be achieved on roadways already congested to gridlock. If the intent is to segregate and designate specific “transit only” roads and streets to support “rapid” that must be at the cost of further congestion and delay for all non transit users. How is that process explained in this plan?

Chapter 4, Par. 6. The discussion of ferry service is one that will always peak the interest of taxpayers on the west side of the Sound. The manner in which the system is addressed in this Plan does a disservice to the ongoing ineffectiveness of the current service and, if possible, makes it worse. The implication that restoring license tab fees to a reasonable level hampered ferry revenue is not only in error by an outright lie. The continued implication that the only funds available for roads and ferries must come from gas tax, license fees, and road tax is not correct. The Constitution requires that the funds collected from those sources be dedicated to specific uses but does not preclude use of other revenues to provide and sustain this basic service to the citizens of the state. Further, the state has a long history of using sales tax on transportation projects to divert transportation dollars to the general fund. Additionally, the WSF is operated under and is the responsibility of WA State Dept. of Transportation (WADOT) . There is no reason for PSRC to waste additional taxpayer funds in

the conduct of “studies” and analysis of ferry system needs. When PSRC is incapable of arranging for the system to actually support service appropriate to start and finish times of major events or to provide reliable service for daily commuters, it is improbable that PSRC will be able to find or enable a real solution to the ferry question.

Chapter 4, Par. 7. The effort to force walking and bicycles as a primary means of transport continues without logic and reason. For over 25 years, throughout the state, major roads and arterials have included designated and restricted “bike” lanes. The associated increase in use of bikes by commuters has been miniscule to the point of questioning the logic of spending further limited resources on those lanes. The program, based on the concept of “build it and they might come” has proven a failure. It is time to stop the madness. As a specific example of the failure of the system one need look no further than Kitsap County. State Highway 16 and Highway 3, extending from Pierce County Line to Poulsbo are bike lane roads. All of the other state highways, upgraded or improved over the last 10 years also include bike lanes. The Clear Creek bike trail, installed at a cost of well over \$1 million dollars, links Silverdale to Naval Submarine Base, Bangor. Notwithstanding the availability of extensive bike lane miles in the county that support commuter traffic, the use by commuters is so low as to be virtually insignificant. That the various trails and bike lanes may see use for recreational purposes is not a consideration in this plan. If it is a consideration, then the recreational and non commuter use of roads and highways must also be included as a planning factor. Put simply, the effort to justify walking and bicycles as meaningful alternates to SOV or other means of commuting has gone on for over 20 years without developing one shred of evidence that the underlying assumption has any factual basis. If King County has one of the largest trail systems in the US, why does road congestion continue to be a major problem? It’s time to let it go and concentrate on using tax dollars more wisely.

Chapter 4, Par. 8. The freight movement provisions appear to consider the west side of Puget Sound as some sort of leper colony when it comes to industrialization. That may be an objective of the overall PSRC effort but it certainly does not meet with the needs or desires of the citizens of Kitsap. The deepwater port of Bremerton, currently providing major ship repair and maintenance facilities for the US Navy, has significant potential for commercial development and use as a gateway to the Kitsap and Olympic Peninsulas. The Facility at Manchester, also a naval facility has similar, if not greater, potential. The airport located in South Kitsap Industrial Area (SKIA), has great commercial development capacity. The availability of class 1 rail facilities in close location to the industrial area and with a potential for expansion to west coast ports must be considered in this plan with its’ 30 year horizon. PSRC may not recognize the opportunities and capacities for economic development in Kitsap but the citizens of Kitsap do.

Chapter 4, Exhibit 4-5. It is interesting to note that not one single major transportation corridor linking the major employment areas of the region escapes designation as a congested corridor. This condition appears contrary to the fact that the land use and transportation planning that have been ongoing for the last 20 years were specifically intended to resolve the congestion issue. It would be appropriate to conclude at this juncture that the policies and plans implemented to date have not been effective and that a different approach must be considered. Unfortunately, this version of the transportation policies and plans does little more than continue previous effort by increasing restriction, regulation, and cost. Is it not time to step back and make sure that our collective efforts are actually addressing a real problem and that the problem has been correctly defined. It does appear that most of the efforts to date have been to deal with symptoms of a perceived or created problem rather than an actual problem.

Chapter 4, Exhibit 4-8. This is another example of statistical data that does not recognize a fact. Computed travel times have increased yet POV use continues to grow. The conclusion is not that commuters need better transit service but that commuters, despite the failures of WADOT, continue to prefer an exchange of some personal time for the freedom of personal mobility offered by a POV. Not considered in the data set is the time differential (time saved by the commuter) when using POV as opposed to a transit system opportunity. Almost, without fail, the actual time to commute by transit will be far longer than the “delay” time incurred by POV. A wise person will always place significant value on their personal time.

Chapter 4, Exhibit 4-11. This data set is intended to demonstrate an increase in transit system ridership. Unfortunately, the data are from a “household” survey and lack certain credibility. Additionally, comparing “data” from 1988 and 1998 to that of 2006 is inappropriate because it does not factor in additional service offered. Finally, the actual cost for the service is more critical to this discussion than the number of persons using the system. The fact that transit system costs to users are highly subsidized by non-user taxpayers must be a consideration. If a transit system is not fiscally self sustaining, it is not appropriate to compare it to a POV mode that must be, by definition, self sustaining.

Chapter 4, Exhibit 4-14. This exhibit alone is sufficient to negate the continued offering of transit as the solution to our transportation needs. The people, through their choices of where to live and work, have made it clear that they are willing to trade some time and distance to live where they want and can afford the housing cost. Because transit use has not skyrocketed over the same period of time is a clear indication of the personal choice of POVs over transit. Your own data tells the story. Please read what you offer.

Chapter 4, Exhibit 4-17. The exhibit is misleading. The issue at hand is the PSRC region and not the entire WA State Ferry system. More significant data for individual runs concentrating on commuter periods would be more appropriate.

There should be no doubt however that commuter use has increased. That is just one more indication that where people chose to live is a decision that is only partially impacted by where they work. Increased rider numbers indicates that more employees have chosen to trade off a commute for the more enjoyable living conditions on the west side of the Sound. Perhaps there is both a land use and a transportation message in those personal decisions.

Chapter 4, Par. 16. In this paragraph the response is actually the result of circular logic. Earlier in the DEIS the rationale for the Plan is to be in compliance with and support land use regulations at the state level. The concept being that land use decisions are made with transportation in mind but not as the overriding factor. Now it is made clear that transportation is the overarching consideration. The ability of PSRC using Regional Transportation Planning Organization (RTPO) authority to grant or withhold federal and state transportation funds based on compliance with and implementation of PSRC land use planning policies strengthens the argument that transportation planning and fund allocation override any land use considerations. Consequently, urban land use planning is corrupted in order to best fit desired transportation planning elements and factors.

Chapter 4 – Analysis. The lengthy and detailed information supporting analysis of the various alternates and the conclusions reached fails to recognize the necessity for basic factual data, directly applicable to the analysis, to validate the results reported. Assumptions are not clearly stated. Base data is so generalized as to have little real meaning in the analysis of individual alternates. Analysis does not clearly differentiate between commute and non-commute travel. The analysis does not clearly differentiate between land use considerations under GMA and RTPO considerations. That difference is critical to final decision since GMA deals with requirements or matters under state law while the RTPO deals with policies that are not binding in the final decision and not subject to review by Growth Management Act Hearing Boards (GMAHB).

Chapter 4, Par. 34. This paragraph is fully inappropriate. The very concept that “transportation” requires mitigation ranks right alongside the concept that people living in the Puget Sound region require mitigating action by government. The assumption that “transportation” has impacts that are negative in the main is so contrary to the common train of thought as to require detailed question. How is the movement of a person from home to place of employment or enjoyment not appropriate to the freedom of the individual and the basic concepts of choice? How does the determination of how an individual may spend their time, as may be associated with transport, not a decision of the individual but a decision of the state? Which of the transportation related alternates and the resulting decisions will be in compliance with the rights of individuals and the sworn duty of every elected official to maintain and protect those rights?

18. Chapter 5, Land Use, Population, Employment, and Housing

Chapter 5, Par. 1. The introductory paragraph provides the following statement concerning regional growth and this Plan. *“This analysis also does not consider what effect, if any, the plan alternatives could have on the overall levels of future growth in the region.”* Unfortunately, the statement acts upon an assumption as fact and the end result is false conclusions. Each of the alternates in this Plan will result in a variation in the growth pattern within the region. After all, that was one of the key considerations in developing the alternates – provide and select an alternate that will result in the growth pattern considered most desirable. Consider the impact of the choices in deciding where to live based not only on commute time but cost of tolls and fees associated with selected road use. Consider the decision on where to live based on the availability of electric and hybrid vehicle support facilities on only certain roads and arterials. Consider the entire transportation plan on cost of business for those either currently located in the region but with relocation mobility or those businesses considering a startup in the region. To continue the planning effort without a clear understanding that each alternate acts as a primary driver for land use, different from other alternates, is inappropriate and dangerous.

Chapter 5, Par 2. This discussion concerning Vision 2040 is revealing in that it contradicts the information in paragraph 1, as discussed above. *“At the same time, the Regional Growth Strategy anticipates a decreased role for smaller cities, unincorporated urban growth areas (UGAs), and rural areas.”* This provides a clear delineation that transportation focus will be to the major metropolitan areas (read the Tacoma, Seattle/Bellevue, Everett corridor) while leaving the rest of the region by the wayside. The very fact that Vision 2040 has policies that are prejudicial to transportation development and improvement in rural areas, effectively locks UGA boundaries, and isolates future economic development to identified “centers” make it absolutely clear that transportation considerations will drive land use and that those land use determinations are already in place and binding on PSRC members.

The entire association of Transportation 2040 and Vision 2040 is the classic example of circular logic. Vision 2040 addressed land use with specific emphasis on increasing use of mass transit, walking and bicycling as the primary means of transportation for people in the region. The specific goal of getting people out of their cars was basic to Vision 2040 land use policy decisions. Now Transportation 2040 is being developed with the argument that it supports the policies of Vision 2040 and the only effective way to do so is with increased emphasis on mass transit, walking and bicycling and major reduction in use of POV.

Chapter 5, Par. 5. The statement *“Both the Growth Management Act and regional policy prohibit the extension of urban levels of service into rural areas.”* appears to be in error. Please identify the specific section and item of GMA that makes this prohibition.

Chapter 5, Par. 8. After long and apparent “detailed” analysis of the alternates and a detailed discussion of the “positive” impacts of the various plans, we are offered a simplistic “hard to tell” when it comes to unintended or unforeseen consequences. One of the specific objectives of proper testing of alternates is the determination of negative impacts and unknowns. That testing also identifies the sensitivity of outcome to individual assumption. It appears that the UrbanSim modeling process is data sensitive and delivers results that may be preconceived as to positive and negative outcomes and assumption credibility. That the modeling process is the “latest and greatest” does not assure proper results. The fact that the actual discussion under the category of “unavoidable impacts” stresses positive outcomes rather than potential negative outcomes and does not add validity to the analysis.

19. Chapter 6, Air Quality and Climate Change

Chapter 6, Par. 1. Data provided in this paragraph locates concentrations of “pollutants of concern” but does not identify the source of the data or the overall sampling program that supports comments like *“Areas of high CO concentrations are usually localized, occurring near congested roadways and intersections.”* A statement of that significance, especially when related to major policy decisions, would lead the reader to believe that a widespread and well documented, long-term sampling program has been undertaken. The program would have to include a large number of sample sites, cover all periods of day and night, all conditions of weather, and be conducted over a number of years to eliminate anomalous data. Has such a study been done in the case of each of the “pollutants of concern” identified in this chapter?

Of note and continuing concern is the failure to include the most significant “greenhouse gas” by weight and volume; water vapor. With the weather patterns of the Pacific Northwest and the marine climate of the Puget Sound region, it is difficult to understand any rationale discussion about either climate or weather that does not include water vapor as a major consideration.

Chapter 6, Par. 3. The real question that should be answered in this section is “Does the Puget Sound region meet the air quality standards established by the federal government and the state? If the answer is yes, all remaining discussion is self serving and moot for planning considerations. In fact, as the paragraph later notes there are no federal standards for greenhouse gases. The state legislation mentioned earlier in this review places specific reduction goals on the state that can only be met by elimination of vehicles and emission producing industries. Lengthy discussion of the matter is inappropriate and misleading.

Chapter 6, Par. 7. A “box” within this paragraph shows an electric vehicle with the caption *“Greater electric vehicle use would reduce greenhouse gas emissions”* The statement has no data to support the validity of the statement. In fact, unless the electric vehicle is supported by non-emission creating electrical generation

sources and general manufacture and maintenance sources, the statement may actually be false. Please make sure that simplistic statements are supported by clear fact or otherwise state the criteria of the statement.

Chapter 6, Par. 10. This paragraph is the ultimate in planner doublespeak. *“Future project-level environmental review would determine if applicable air quality standards would be exceeded at specific locations. Where this occurs, potential mitigation for such impacts would be evaluated and implemented as appropriate to address the impact. If all mitigation measures required as part of subsequent project-level actions are implemented, no significant unavoidable adverse air quality impacts are expected under any of the alternatives.”* In plain English, the paragraph says “We do not know if this plan will achieve the objectives set forth. If it does not we will come up with another idea that surely will work”. That answer does not pass the rigid alternate testing standards that should be required for planning at this level. Considering that government has been planning transportation to fix the problem for over 20 years without success, why is this answer any different?

20. Chapter 7, Noise

Chapter 7. While there may be some need to consider noise as a function of urban life style, it is highly unlikely that transportation related noise need be a major consideration. If the intent is to isolate people from the noise created by surface traffic how far behind can the effort to reduce the overpowering abundance of sound created at sporting events or simply by people walking on a street. How far away can we be from volume “governor” on radios and TV sets?

Chapter 7, Par. 8. Noise mitigation measures identified include “*Quietstone panels*”. Not mentioned here is the cost to install the panels including the additional “right of way” requirements and the continuing maintenance costs. In addition, the panels create a barrier to future expansion and tend to artificially limit choice when addressing future transportation problems. That impact would of course be an “unintended consequence” of panel use and would qualify as a potential negative impact. That was not listed as a consideration for any alternate.

21. Chapter 8, Visual and Aesthetic Resources

Chapter 8. This entire chapter should be eliminated. Roads are supposed to serve the primary purpose of allowing people to move from one location to another efficiently. The scenic quality of major arterials is not properly a consideration for transportation planners. The use of limited resources to provide “high quality visual arterials” is unwarranted. Nowhere in the Constitution or law is there provision for use of road funds to plan or install landscaped dividers. Please stick to hard engineering solutions and leave the aesthetics to the Parks Department.

22. Chapter 9, Water Quality and Hydrology

Chapter 9. What does Puget Sound Partnership (PSP) have to do with this plan? Other than proper installation of bridges and culverts (not addressed in this plan) and control of rainwater runoff from roads (not detailed in this plan) there is no link between the PSP and PSRC. The entire chapter is little more than another dissertation on the evils of man and his impact on nature. This document is supposed to deal with issues directly related to the alternates proposed. Please stick to that matter. With respect to potential negative impacts during construction, current technology and regulation have that consideration under control. A greater problem is created annually by municipal sanitary sewage spills but that is not addressed here. There is no material addressing the potential hazard from vehicle collisions, railroad accident, plane crash, or volcanic ash plume. Why is this paragraph included?

Once again in the negative impact section is a statement without substantiation and generally without meaning.. *“New impervious surfaces, new pollutant-generating impervious surfaces, and increases in (Vehicle Miles Traveled)VMT would result in some adverse impacts to water quality and hydrology, but at different levels among the alternatives. Minimization and mitigation measures for specific projects, if properly designed and implemented, would be able to largely offset these adverse impacts.”* Impervious surface does not automatically result in loss of infiltration to an aquifer or increase polluting runoff. The term “pollutant generating impervious surface” seems to indicate that some magic chemical reaction occurs with some “impervious” surfaces. What is this thing called a “pollutant generating impervious surface”? Of course there is the entire question of what is impervious and is it the same in King County and Kitsap. Finally, if the intent is to transition to a significant number of electrical vehicles over the planning horizon, the good old VMT has to go and a new culprit will need to be identified.

23. Chapter 10, Ecosystems and Endangered Species Act Issues

Chapter 10. Again the planners could not avoid the opportunity to drag out a “soapbox” to bang the environment drum. There are locations in the region where salmon actually swim across roads in periods of high water. That does not appear to be an issue with the ESA crowd. To argue that this plan, under which essentially no new roads are being constructed, poses an additional hazard to salmon is without merit. Do cars run over deer, raccoons, squirrels, and hit an occasional bear? Of course they do. Cars, trucks, busses, trains, planes, and ships occasionally run into people and each other and people get hurt. Do we invoke the Endangered Species Act (ESA) to protect people? Hardly. Do we have our priorities a bit out of whack?

24. Chapter 11, Energy

Chapter 11. The energy equation for the state and the region is clear and overriding in consideration of future planning. Our energy production, as detailed in Exhibit 11-3 makes it abundantly clear that making the change from

conventional technology to new technology will be difficult and costly. With less than 4 percent (at best) of our energy created by “renewable” sources after a number of years of subsidized development, the ability to grow that production capacity by over 600 percent short term is questionable. Because the demand for electrical power will be increased by industrial, residential, and transportation growth, a balance of priorities will be required. Recent discoveries that certain biomass fuels, heavily subsidized and championed for development, are more detrimental to the climate than normal hydrocarbon fuels, does not support a promising outlook on alternate fuel solutions. Technology may offer a significant breakthrough but betting the farm on that potential is not appropriate. Energy independence does not mean independence from energy. The continued reluctance to explore and exploit the natural resources of the country while complaining about dependence on foreign sources of energy makes no sense at all. It should be evident that continued research and development should be pursued in concert with development of existing energy resources.

25. Chapter 12. Earth

Chapter 12. The need for consideration of geological factors is appreciated. To dedicate 14 pages to the topic might be a bit of overkill. Of note, there is no mention of evacuation route sustainability in the event of earthquake or volcanic activity.

26. Chapter 13, Environmental Health

Chapter 13. This chapter is another begging for a reason in being. The concept that a road or transportation system presents an “environmental health” problem is questionable. As long as you are at it, did you consider that concrete has radioactive characteristics?

27. Chapter 14, Public Utilities and Services

Chapter 14. The majority of the reasons identified in support of proper transportation networks have existed for the past 20 years without corrective action. Since Transportation 2040 is an update of the 2020 version that made the same kinds of arguments, where is the certainty that any of the considerations will actually be addressed or the problems solved?

28. Chapter 15, Parks and Recreation

While it is appropriate that some effort be made to provide transportation service to parks and recreational facilities, there is some conflict with the basic issue. Parks and recreational facilities in urban area are supposed to be located within easy walking distance of residential areas, supporting the concept of community character. While larger multi-community facilities might need additional transportation support, it is appropriate that such support be event related and not continuous unless actually fiscally supported by users. Major regional parks and facilities are most often located in rural or near rural areas and not generally served by mass transit on a continuing or frequent basis. If the concept is to build bike trails in rural parks, there has to be some way for riders to access the parks.

Transit busses cannot handle reasonable number of users and thus PRIVATELY OWNED VEHICLE remains the normal transportation means. The disconnect between facility users, user residence location, and facility location needs to be addressed in more definitive terms in order to properly address this issue in planning.

29. Chapter 16, Historic and Cultural Resources

While the need for understanding impacts on actual historical sites is appreciated, the need to consider sites that qualify for listing but which are not listed is not clear. In addition, since the alternates proposed in the plan deal with major highways and arterials and do not deal with individual city streets, it is not clear why significant effort has been devoted to potential historical sites that are not directly impacted by the proposals. It is not the intent of STATE ENVIRONMENTAL PROTECTION ACT or the ENVIRONMENTAL IMPACT STATEMENT to visit or revisit every possible site within the geographic area of a proposal. If that were the case, to do justice to potential historical sites or potential archeological sites would require years of research and volumes of data and analysis. The visual depiction of "sites" provided in Exhibit 16-1 provides essentially no information of any value and certainly does not assist in understanding the potential impact created by any of the alternates. Other than providing "fluff" to satisfy a requirement in the "ENVIRONMENTAL IMPACT STATEMENT elements" list, that chapter adds no real value to the analysis effort.

30. Chapter 17, Environmental Justice

Environmental justice is a determination that is to be considered under certain circumstances for a limited scope of federal projects. There is no requirement for any consideration of "environmental justice" under GMA.

This chapter makes the all too common and insulting assumption (without stating it as such) that a person who is classed as a "minority" by virtue of government decision requires or desires some sort of special consideration to gain personal fulfillment and enjoyment in life. To the contrary, most people, regardless of ethnic origin or history, want little more than for government to get out of the way and to allow them to live their lives free of unwanted and unnecessary "assistance". There are more instances of government directed or created problem conditions for minority groups than there are positive outcome government programs. The failed system of government constructed and operated "low income" housing projects provide the best single example of what government can and will do, given the opportunity. Class mobility is a fact of life. Providing a means to stifle individual incentive for improvement or, worse yet, establishing impediments to that improvement in the name of "environmental justice" is the least desirable role for government. This entire chapter with its failed assumptions, failed political approaches of "assistance", and its historical demonstrated ineptitude of government involvement is the classic example of using a political agenda to sell a flawed proposal. Not one of the alternates in the

Plan will make any significant difference in the life outcome of any citizen identified as a minority. To the contrary, the cost of each of the alternates to individual citizens will be heaviest on low and moderate income families who will have no personal options for transportation and will be forced to comply with “baseline conduct” parameters. They will not only pay the monetary price but will also lose opportunity for advancement because of limited transportation choices. The time cost of the “transportation choices” they are offered will further reduce the time for family involvement and parental oversight of children. The plan has all of the earmarks of either expanding the rolls of the “less fortunate minority members of our community” or continuing those already in that group for generations to come.

Of course, if the intent of the “environmental justice” concept is to reduce the common denominator for transportation so that all suffer equally under the plan it can be argued that in a relative perspective, minority populations will “improve” their standing in the community. Unfortunately, that approach would appear to be contrary to other goals such as economic development and community sustainability.

The information provided in Chapter 17, paragraph 10 substantiates the comments above and further condemns the approach taken by PSRC in the development of this plan. *“The additional environmental justice analysis described in the response to Question 7 in this chapter will help to identify whether there will be significant adverse impacts to minority and low-income populations. The public outreach process to minority and low-income populations described in the response to Question 4 in this chapter will also help to identify the most important issues for these populations. These findings will be documented in the ENVIRONMENTAL IMPACT STATEMENT.”* In essence, the chapter takes 23 pages to describe major considerations that are offered and very significant to the testing and analysis of the alternates. The chapter then concludes by saying that we really don’t know if there is a problem, we have no real information on the potential impact of any of our planning on the populations in question, and that we need to do more work. That is not the kind of input required to make a logical decision on the alternates proposed or any other possible courses of action. Either do the work necessary to support analysis or remove this section from the DEIS.

31. Chapter 18, Human Health

This chapter, similar to the previous chapter, is not required by SEPA and adds little or no data of value to the analysis process. It appears that an underlying assumption of the information in the chapter is that this transportation proposal, or perhaps this plan in concert with Vision 2040, will bring about a major revision to the personal life styles of the people of the region. How this is to happen, short of exercise of ultimate police power of the state, is not made clear. All of the transportation options discussed in the Plan have been reasonably available for

more than 40 years. People have simply elected to not use the “more healthy” options presented to them. How that changes by adoption of one of the alternates in this plan is not clear.

Chapter 18, Par. 2. This discussion of exposure to “toxic” materials is clearly out of place in this plan. There is another unspoken assumption in the presentation that, when treated as fact, presents a situation that is not known to exist and which has no factual basis for inclusion. Acquisition of property for right of way does not automatically present a “toxic material” hazard or consideration. If that were the case, every project regardless of size or scope in which disturbing earth is involved would require pre-consideration of the presence of “toxic materials.” If the consideration is the cumulative ineptitude of government jurisdictions in handling potential hazardous materials runoff from existing roads, disturbed during road upgrade or expansion projects, that consideration should be properly identified and addressed.

Chapter 18, Par. 3. The subject of “noise” is addressed in detail in Chapter 7. There is no need to revisit that subject here.

Chapter 18, Par. 4. The subject of air quality is discussed in Chapter 6 and need not be revisited here.

Chapter 18, Par. 5. The subject of water quality is addressed in Chapter 9 and need not be revisited here. Of note, there is no section in Chapter 19 addressing the negative impacts or outcomes of the plans on human health. There is no mention of the potential for depression caused by inability to gain better employment because of the limits of transportation opportunities. There is no mention of the individual or family stress that would be caused by significant increases in commute times and cost. There is no mention of the potential impact on the school performance or behavior of children forced to live in crowded urban conditions and without reasonable access to parks and open areas. There is no mention of the potential increases in risk to personal safety that are associated with walking in crowded urban neighborhoods during periods of darkness. Perhaps it would be worthwhile for some few members of the PSRC staff to subscribe to local newspapers and read them. Although the Post Intelligencer is no longer available, other papers actually document the less than utopian conditions that actually exist in the “urban areas” that PSRC would transform by these policies.

32. Appendices review.

A preliminary review of the appendices offered revealed no immediate reason for concern beyond that already expressed with respect to the content of the report. A significant review of the “references” is appropriate to validate that the information used is both pertinent and applicable to the matter at hand. While the ‘endangered and threatened species” listing is interesting, it is somewhat amusing to find that species with no historical habitat within a given county are

listed for that county. In addition, the inclusion of “sensitive” species that frequently appear on the dinner plate and for which harvest seasons exist is confusing.

Significant additional detail must be devoted to Appendix K dealing with the methodology for data consideration and analysis. The various statistical divisions used in the process and the data associations will need to be better understood to properly understand the “results” reported in the DEIS. For example, the decision to employ regional level economic forecasting rather than county level forecasting has significant potential to produce outcomes not appropriate for smaller counties or other jurisdictions within those counties. The overarching assumptions leading to that decision are not clarified other than “it’s too hard”. As with the overall DEIS content, the ability to understand the reliability of the process depends heavily on the process by which assumptions were made and weighted in the analysis. That is not clear in the appendix.

Some examples of questionable “assumptions” and failure to provide adequate explanation are:

- a. Type of travel – There is no apparent category for traffic flowing through the region for any purpose. Because of the use of major north-south and east-west arterials and freeways for general commerce, regardless of time of day, that traffic is a major consideration for congestion.
- b. Family Income – The limitation of income consideration at \$90,000 is not appropriate. The exceptional costs associated with two family workers (such as day care at \$1,500 per month) and the inflated cost of housing do not allow the family at the \$90K level the full range of residence and transportation options and opportunities. A more appropriate top income level would be \$150,000 with an additional bracket at the \$120,000 level
- c. Age demographics and employment characteristics – Certain areas of the region are experiencing a significant change in the age demographics of the population and thus the workforce and transportation “habits” of the population. Further, recent and projected economic conditions indicate that many who would have moved from the work force (and the commuter pool) in the near term are going to remain employed. The result will be an artificial expansion of the transportation needs not consistent with OFFICE OF FINANCIAL MANAGEMENT projections or economic forecasts.
- d. Vehicle classes – There is no inclusion of motorcycles in the classes.
- e. General – There is no clear indicator of water transport vehicles. In turn, the failure to list ferries or foot ferries limits the potential for consideration of personal watercraft or commercial cross sound barge traffic for industrial or commercial movement.

- f. Because Bremerton National Airport, the port facilities at Bremerton and Manchester, and the rail facilities at SKIA were not included in the considerations of alternates, no analysis of development and use of those facilities was completed. That oversight can not be considered in the best interest of Kitsap or the region.

33. Overall Comments:

1. The DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) is a professionally produced document with construction and graphics overshadowing actual factual content. The document is not easy to read or understand because of the manner in which information is presented and the redundant nature of some information.
2. The ability to clearly understand the assumptions used in the preparation of the DEIS, the alternates, and the analysis model up front is not presented. The reviewer is not able to consider the information presented in light of assumptions and frequently finds that challenge to “facts” presented is not feasible.
3. While there is no requirement for a “cost/benefit analysis” within the DEIS, there are numerous instances in the DEIS when cost is either alluded to or directly mentioned as a consideration. Family income and other transportation cost factors are also used in the DEIS. In order to make reasonable analysis of the alternates available, the cost of each alternate in terms of facilities construction cost (taxpayer dollars) and direct personal cost to individuals (tolls, fees, etc) is essential information.
4. It is somewhat disconcerting that Transportation 2040 had to be written to the level of detail demonstrated. The essentials of the plan are matters of policy in Vision 2040 and the supporting arguments for those selected policies are included in that document. It appears that Transportation 2040 was created either to place an iron clad binder on Vision 2040 or to provide an opportunity for PSRC to further expound a political agenda. In either case the benefits derived from this document are questionable as compared to the taxpayer cost.

The End