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PUGET SOUND REGIONAL COUNCIL

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Mary McCumber, Executive Director  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  
Seattle, WA 98104

Subject: Certification Review Finding Report  
Seattle-Tacoma-Everett Metropolitan  
Transportation Management Area (TMA)

Dear Ms. McCumber:

Based upon our certification review conducted September 16-20, 2002, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) have determined that Puget Sound Regional Council (PSRC) demonstrated a continuing, cooperative, and comprehensive transportation planning process for the Seattle-Tacoma-Everett metropolitan transportation planning area.

The transportation planning process is certified subject to corrective actions. These corrective actions, as well as findings and recommendations for improvement, are discussed in the enclosed certification review report. A draft of the finding was submitted and reviewed by your agency to ensure that we have correctly captured what was reflected in the review.

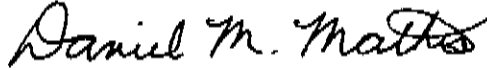
We sincerely wish to encourage you, your staff and Board members to seek even stronger relationships with Washington State Department of Transportation, Sound Transit and the Regional Transportation Improvement District to bring more clarity to the regional transportation decision-making process.

Our staff will be contacting you to arrange a time when the certification review results can be presented to your Executive Board. In addition, our staff will be contacting you to

assist in addressing and implementing the necessary corrective actions activities.

We appreciate the time you and your staff spent with us during the review. The commitment to excellence in transportation planning is obvious to our staff. If you have any questions, please call any of the federal review team listed in the report.

Sincerely,



Daniel M. Mathis, P.E.  
Division Administrator  
Federal Highway Administration  
Washington Division



R.F. Krochalis  
Regional Administrator  
Federal Transit Administration

Enclosures

cc: Ashley Probart, WSDOT  
Charlie Howard, WSDOT  
Wayne Elson, U.S. EPA  
Puget Sound Clean Air Agency  
Sound Transit  
Dick Nelson, Integrated Transport Research  
Charles Goodman, FTA  
Gloria Shepherd, FHWA

**Puget Sound Regional Council**  
**PLANNING CERTIFICATION REVIEW**  
**SEPTEMBER 16-19, 2002**

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# I. Executive Summary

Pursuant to 23 U.S.C. 134 and 49 U.S.C. 5303, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly review and certify the metropolitan transportation planning processes in Transportation Management Areas (TMA) at least every three years.

In general, the reviews consist of three primary activities: a site visit, review of planning products (in advance of and during the site visit), and preparation of a report, which summarizes the review and offers findings. Each of these components was explicitly considered in preparing this report and making a certification determination.

Based on the review, FHWA and FTA have determined that subject to completion of the corrective actions required herein, the metropolitan transportation planning process in the Seattle-Tacoma-Everett area meets the requirements of 23 USC 134 and 23 CFR 450.334 and is generally functioning well. In addition, since the Seattle-Tacoma-Everett area is a maintenance area for transportation related air pollutants, FHWA and FTA have determined that PSRC has an adequate process to ensure conformity in accordance with procedures contained in 40 CFR part 51.

During the 2002 review, three corrective actions were identified. Those actions included: Public Involvement; Title VI; and Congestion Management System (CMS).

As with most large metropolitan areas, congestion and lack of mobility are major concerns. Therefore, FHWA and FTA took an in-depth look to identify, encourage and promote efficient management and operation of the transportation system.

The result of this review is that **FHWA and FTA are jointly certifying the transportation planning process in the Seattle-Tacoma-Everett metropolitan area, subject to adequate completion of the corrective actions described in Section III of this report. This certification will remain in effect for three years.**

## **II. Introduction**

During the week of September 16-20, 2002, a team of representatives from FHWA and FTA met with representatives of the Puget Sound Regional Council (PSRC) and Washington Department of Transportation (WSDOT), local agencies and the public. This site visit consisted of structured meetings with staff from the regional, local, and state agencies responsible for transportation and air quality planning, and the major public transit providers. It also included an open forum at which members of the public spoke.

Prior to the site visit, the team reviewed extensive documentation on the planning processes in the area. The federal review focused on whether transportation planning activities of PSRC and other agencies responsible for transportation planning in the Seattle-Tacoma-Everett area are being carried out in accordance with FHWA and FTA regulations, policies, and procedures in place as a result of the passage of the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) and the subsequent Transportation Equity Act for the 21<sup>st</sup> Century (TEA-21).

### **Purpose**

The purpose of this review was two-fold. The first purpose was to allow FHWA and FTA to evaluate whether the transportation planning process meets joint FTA and FHWA planning regulations, and to certify the planning process as required by 23 CFR 450.334, entitled "Metropolitan Planning Process: Certification." The second, and perhaps most important purpose, was to ascertain how well the planning process is performing and offer suggestions considered likely to strengthen major aspects of the transportation planning process. As part of this review, the team considered products and materials related to the transportation planning process, including: the Regional/Metropolitan Transportation Plan (RTP/MTP), the region's long-range transportation plan; the Metropolitan Transportation Improvement Program (MTIP); and the Unified Planning Work Program (UPWP).

### **Objectives**

The objectives of the planning certification review are to determine if the planning activities of PSRC and other agencies with responsibilities for regional transportation planning are conducted in accordance with FHWA and FTA regulations, policies, and procedures including the provisions of ISTEA and TEA-21.

The regional transportation planning process for the Seattle-Tacoma-Everett area is a continuing, cooperative, and comprehensive (3-C) process that results in the development, implementation, and support of transportation improvements.

The UPWP documents PSRC transportation planning activities and it mentions some of the other significant transportation planning activities occurring in the region.

The regional transportation planning products, including the MTIP and the RTP/MTP, reflect the identified transportation needs, priorities, and funding resources.

Products of the transportation planning process are multi-modal in perspective, complete, based on current information, and interrelated.

Requirements and objectives of ISTEA and TEA-21, the Clean Air Act Amendments (CAAA), Title VI of the Civil Rights Act, and the Americans with Disabilities Act (ADA) are considered and incorporated where appropriate into the planning process and supported through development activities.

### **How To Read This Report**

Section III presents the results of this 2002 certification review. Section IV of this report addresses how issues from the 1999 USDOT certification review were addressed during the intervening three years. Both sections include the following terminology:

**Findings:** Statements of fact based on the FHWA and FTA observations made during the site visit or during the review of planning documents. In addition to providing the basis for potential corrective actions or recommendations, the findings also document the multitude of good practices, which support a USDOT planning certification.

**Corrective Actions:** Improvements needed to correct statutory or regulatory deficiencies which, if not addressed, could lead to a "failure to certify" finding and the possible disruption of federally funded programs and projects.

**Recommendations:** Not statutory or regulatory deficiencies, but actions identified by FHWA and FTA that represent best practices that are strongly endorsed.

### **Federal Review Team**

Vernon Mickelsen, Transportation Planner, FHWA - Washington Division  
Jennifer Bowman, Community Planner, FTA - Region X  
Sid Stecker, Transportation Planner, FHWA - Washington Division  
Jodi Petersen, Civil Rights Program Manager, FHWA- Washington Division  
Sheldon Edner, Metropolitan Planning & Policy Team Leader, FHWA – Washington, D.C.

### III. 2002 Review Findings

#### FINDINGS - CORRECTIVE ACTIONS - RECOMMENDATIONS

##### FY-2002 Review Areas

1. **Vision and Goals.** The vision of the transportation system over the next 30 years and the goals to achieve the vision.

**Finding:**

- The MTP focuses first on maintaining, preserving and managing the existing multi-billion dollar public investment in the transportation system.
- The MTP focuses on ensuring that the region continues to develop a balanced transportation system that includes choices for private vehicles, public transit, ridesharing, walking, biking and various freight modes.
- The MTP emphasizes a connection between land use and transportation which is intended to reduce long-term infrastructure costs and provide better links between home, work and other activities.
- The MTP identifies that performance monitoring completes the link between policies and the investment strategies designed to implement those policies.

**Corrective Action:** None.

**Recommendation:** None.

2. **MPO – General.** The basic structure and make-up of the MPO including the agency the members represented in the MPO.

**Finding:**

- Governor Booth Gardner designated the PSRC as the MPO for the four counties of King, Kitsap, Pierce, and Snohomish documented in a September 24, 1991 letter.
- Resolution A-91-01 provided the framework for a new regional planning agency for the Central Puget Sound Area.
- PSRC consists of a General Assembly, comprised of all voting members of the organization, an Executive Board of representatives of the voting members, and advisory boards and task forces as established by the board. The General Assembly meets annually and at the request of the Board to elect Board officers, to review and approve key Board decisions such as the regional transportation plan, regional growth management strategy, annual work program and annual budget. The Board carries out all delegated powers and managerial and administrative responsibilities between meetings of the General Assembly. Policy boards are established to advise the Board policy changes.
- General Assembly membership consists of all local, general-purpose governments (cities, towns, counties) in King, Snohomish, Kitsap and Pierce Counties.

- Tribal Governments currently participate as associate members of PSRC, which incorporates the Tribes into the local planning process without infringing on their rights to be treated as a sovereign entity by considering them on par with local jurisdictions, as would be the case if they were full members. This creative solution, far ahead of many other MPOs in the nation, was developed through discussions with area Tribes. Native American Tribes are eligible to petition for full, voting membership on the General Assembly.
- Transit agencies are not direct members of PSRC's Executive Board. Pursuant to RCW 47.80.060, 50 percent of the county and city local elected officials who serve on the Executive Board must also serve on transit agency boards or on a regional transit authority. These local elected officials serve as voting members of the PSRC Executive Board. Community Transit, Kitsap Transit, Sound Transit and Pierce Transit are non-voting members of the Transportation Policy Board.
- The Executive Board, pursuant to State legislation, determines the Transportation Policy Board and Growth Management Policy Board membership. Membership includes representatives of PSRC's member jurisdictions and regional business, labor, civic and environmental groups. They make recommendations on key transportation issues to the Executive Board.
- PSRC has many committees to provide guidance to the board on special topics, including the Transportation Enhancement Committee, the Bike and Pedestrian Committee, the Transportation Demand Management (TDM) roundtable and the Freight Mobility Roundtable. These groups are made up of representatives of action and advocacy groups, environmental and historic preservation organizations, Native American Tribes, transit and freight, local and regional businesses, and members of the general public.
- PSRC played an active role and efforts in planning and participating in the Greater Seattle Chamber of Commerce 2002 Leadership Conference in October 2002.

**Corrective Action:** None.

**Recommendation:**

2a. It is recommended that PSRC should continue to collaborate with WSDOT's Tribal Liaison to develop an agreement or plan to provide a framework from which PSRC, its member jurisdictions and the seven federally recognized Tribal Governments can utilize to cultivate effective and meaningful participation by the Tribes.

2b. While FHWA and FTA recognize that PSRC has members from the general public on some of its committees, it is recommended that PSRC actively evaluate if additional private citizen participation (representative of the region) is needed on its committees and task forces to gain a more diverse public perspective.

2c. It is recommended that PSRC should continue to engage with the Greater Seattle Chamber of Commerce in a meaningful dialogue regarding linkages in governance



models where transportation planning and investments have been able to gain citizen confidence and support robust and innovative capital improvement programs.

### **3. Metropolitan Planning Area Boundaries.**

#### **Finding:**

- As the result of the 2000 Census, Marysville was split from the 1990 census urbanized area of Seattle into its own urbanized area. Marysville is within the MPO boundary of PSRC and at this time will remain joined with PSRC.
- The MPO boundary of PSRC covers the entire four counties of Snohomish, Kitsap, King, and Pierce.
- The boundaries of the MPO include the boundaries of the attainment/maintenance area for transportation related pollutants under the Clear Air Act.
- Tacoma urbanized area was absorbed into the Seattle-Everett urbanized area as a result of the 2000 census.
- Bremerton, as its own urbanized area, has opted to be part of PSRC.

**Corrective Action:** None.

**Recommendation:** None.

### **4. MPO Agreements**

#### **Finding:**

- PSRC and WSDOT have signed a MOU (December 3, 1996) for transportation planning coordination and cooperation. It describes organizational roles and responsibilities of transportation planning, programming, and public involvement.
- A March 6, 1998 MOU exists between PSRC, Central Puget Sound Regional Transit Authority (Sound Transit), Snohomish County Public Transportation Benefit Area Corporation (Community Transit), City of Everett – Transportation Services (Everett Transit), King County Department of Transportation (King County Metro), Kitsap County Public Transportation Benefit Area Authority (Kitsap Transit), and Pierce County Public Transportation Benefit Area Authority (Pierce Transit). The MOU is intended to provide a framework for cooperative transportation planning between the parties, avoid duplication of effort, and optimize public transportation planning and investments in support of local, countywide and multi-county growth management policies and objectives in the Central Puget Sound Region.
- A December 2001 MOU between Puget Sound Air Quality Authority, Washington State Department of Ecology, and PSRC was signed and implemented which addresses the respective duties and responsibilities of the Clean Air Agency, Ecology and PSRC in developing 10-year air quality maintenance plans designed to ensure continued attainment of the National Air Quality Standards, and also addresses the duties and responsibilities of the agencies for preparing the air quality

conformity analyses of the metropolitan transportation plan (MTP) and the transportation improvement program (TIP), to ensure that the MTP and TIP conform to the air quality goals of the State Implementation Plan (SIP).

- The Transportation Operators Committee is working on establishing a formula for distribution of FTA Section 5307 and 5309 formula funds.

**Corrective Action:** None.

**Recommendation:**

4a. Provide the draft distribution formula for Section 5307 and 5309 Fixed Guideway funds and associated inter-agency agreement(s) to the FTA.

**5. Responsibilities, Cooperation, and Coordination** - The MPO, in cooperation with the State and operators of publicly owned transit services, is responsible for carrying out the metropolitan planning process.

**Finding:**

- A December 3, 1996 memorandum of understanding (MOU) identifies the transportation planning coordination and cooperation between PSRC and WSDOT. It identifies the procedures for cooperatively developing a unified planning work program, transportation plan, and transportation improvement program. Clearly, it is demonstrated that PSRC and WSDOT actively coordinate planning activities. However, it is unclear from the MOU or other documentation exactly where the various planning activities are coordinated within which the offices of WSDOT, i.e., WSDOT's NW Washington Division - Planning and Policy Office, Transportation Planning Office - Olympia, etc.
- A March 6, 1998 MOU identifies the planning coordination and cooperation between PSRC and the Sound Transit and the five public transit agencies (PTA) of the area. It identifies the procedures for cooperatively developing a unified planning work program (UPWP), transportation plan, and transportation improvement program (TIP).
- There is evidence of PSRC's coordination with other providers of transportation (sponsors of regional airports, maritime port operators, rail freight operators, etc.) on the development of the metropolitan transportation plan and TIP.
- PSRC and Sound Transit have an agreement which spells out each of their roles and responsibilities. This agreement will continue to guide the planning efforts through Sound Move Phase II.
- The Regional Transportation Investment District (RTID) was established under recent Washington State Legislature's enabling legislation which put adjacent county governments in a leadership role for development of revenue enhancement proposals to the voters. PSRC is coordinating with RTID.
- At the time of the Certification Review, the Elevated Transportation Commission (ETC) was represented through the City of Seattle. Since the

review, area voters authorized the formation of the new monorail agency, now called the Seattle Public Monorail Authority. PSRC intends to incorporate the new agency into the regional transportation planning process.

**Corrective Action:** None.

**Recommendation:**

5a. PSRC may want to review its agreement with Sound Transit as it moves into the planning for Sound Move Phase II to determine whether the current agreement with Sound Transit is still appropriate. In doing so, PSRC may want to look at other agreements in other metropolitan areas, such as the Portland Metropolitan area. The Tri-County District of Oregon focuses on transit operations, project development and execution, while the MPO (Metro) specializes in regional transportation and land use planning as well as decision-making on long term capital investments.

5b. To fully understand how and where the planning coordination takes place between PSRC and WSDOT, a more detailed MOU or documentation should be developed identifying which of the various WSDOT offices (NW Washington Division - Planning and Policy Office, Data Office, Transportation Planning Office - Olympia, etc.) coordinates the planning activities with PSRC.

5c. PSRC should coordinate with the Seattle Public Monorail Authority to establish its intent on seeking federal participation for their future segments. Specific agreements to clarify roles and responsibilities between the two agencies may be needed.

## **6. Unified Planning Work Program (UPWP)**

**Finding:**

- The UPWP documents planning activities to be performed with FHWA & FTA funds.
- The MOUs between WSDOT and PSRC, and between the transit agencies and PSRC state that they will coordinate in developing the UPWP. However, neither the MOUs nor the UPWP fully describe how this coordination occurs.
- WSDOT NW Washington Division Planning and Policy Office submits a separate UPWP for the Seattle Metropolitan area.
- Page C-2 of the UPWP mentions the “planning priorities” but does not discuss them in any detail.
- The UPWP does not include a sufficient description of all metropolitan transportation and transportation-related air quality planning activities anticipated within the UPWP time frame (1-2 years)
- The Table of Contents and the section headings in the document itself are inconsistent and confusing. For example, “Program Area” and “Functions” are used to represent the same thing; “Project Name” and Work Elements” are also

used to represent the same thing.

**Corrective Action:** None.

**Recommendation:**

- Prior to PSRC's Board approving the UPWP, PSRC will send FHWA and FTA a draft UPWP for review and comments. The following items should be addressed in the next UPWP (July 2003-June 2005):

6a. Identify and discuss PSRC's planning priorities.

6b. A description of the coordination between PSRC, WSDOT and the transit agencies in developing the UPWP. This will include how projects were selected for funding, including those coming from a CMS.

6c. A more substantial discussion of all metropolitan transportation and transportation-air quality related planning activities in the planning area. This includes corridor studies, sub-area studies and mega projects, regardless of the project lead or funding source.

6d. Consistent use of section headings in the Table of Contents, Tables, and the body of the UPWP.

6e. PSRC and WSDOT's NW Washington District Planning and Policy Office should consider the feasibility of a joint UPWP for FTA's and FHWA's consideration. At a minimum, project lists from Planning and Policy Office's UPWP must be included in PSRC's UPWP.

6f. In the next UPWP update, PSRC should a short description of the Elevated Transportation Commission (ETC) including: a discussion of how it came into existence and the development of the new transit agency; clarify the transit operators, WSDOT's and PSRC's respective roles with regard to transportation planning activities; and identify any additional issues that may arise as the program evolves.

6g. In the next UPWP update, PSRC should discuss the transportation related activities of Regional Transportation Investment District (RTID) including how it came into existence and the roles of PSRC with the RTID.

## **7. Planning Factors.**

- i. Support the economic vitality of the metropolitan planning area, especially by enabling global competitiveness, productivity, and efficiency.

**Finding:**

- The metropolitan Plan describes both ten-year and long-range freight mobility investments.
- ii. Increase the safety and security of the transportation system for motorized and non-motorized users.

**Finding:**

- Safety of the transportation system was addressed but not well documented in the metropolitan Plan.
- iii. Increase the accessibility and mobility options available to people and for freight.

**Finding:**

- Ten-year and long-range freight mobility investments include both infrastructure and operational improvements.
- Many strategies of the metropolitan Plan include transportation system management strategies to optimize the efficiency and effectiveness of the multimodal transportation system by managing congestion, increasing reliability and providing convenient connections for people and goods.
- iv. Protect and enhance the environment, promote energy conservation, and improve quality of life.

**Finding:**

- A major theme or goal of PSRC as reflected in the metropolitan Plan is to improve the quality of life.
- A factor in the metropolitan Plan is to identify the transportation investment choices of PSRC that will influence the region's environment in the long term. Air quality in the region has been steadily improving.
- Although not directly implied, improvements in non-motorized transportation, expansion of the HOV system, providing more and better transit, ridesharing programs, and land use planning all contribute to energy conservation.
- v. Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight.

**Finding:**

- PSRC recognizes that improvements and capacity enhancements are needed to improve mobility on the region's highway and regional arterial networks including missing links in the system, completing a well connected freight network, and creating safe bicycle and pedestrian connections within, to and between the designated Urban Centers.
- vi. Promote efficient transportation system management and operation.

**Finding:**

- One of the highest priorities of the metropolitan Plan is optimization of the existing transportation system. One key method is through implementation of traveler information and management of the Intelligent Transportation System (ITS).
  - Ten-year investment strategies and long-range investments include transit signal priority, ramp metering, transit vehicle tracking technologies, and expansion of the freeway management system.
  - In November 1998, PSRC published "Putting Transportation Demand Management to Work – An Action Strategy for the Central Puget Sound Region". It focuses on using TDM to maximize the use of the highway by spreading the peak hours of road use and eliminating commute trips.
- vii. Emphasize the efficient preservation and maximum utilization of the existing transportation system.

**Finding:**

- The high priority of the metropolitan Plan is to support maintenance and preservation of the existing transportation infrastructure and services.

**Corrective Action:** None.

**Recommendation:**

- 7a. FHWA and FTA strongly encourage PSRC to more fully address issues pertaining to increasing the safety and security of the transportation system for motorized and non-motorized users. Further, we strongly suggest connecting the safety and security of the transportation system with system management and operation.

**8. Public Involvement:** The transportation planning process is to include proactive public involvement that provides complete information, timely public notice, full public access to key decisions, and supports early and continuing involvement of the public in developing plans and TIPs.

**Finding:**

- PSRC's updated Public Participation Plan was adopted on April 25, 2002.
- The Public Involvement Plan sets forth the basic principles and guidelines describing the various processes PSRC will utilize in notifying the public of meetings, open houses, events, etc.
- In some areas, the public involvement process appears to provide complete information, public notice, full public access to key decisions and supports early and continuing involvement of the public in developing plans and TIPs.
- A minimum of 45-day comment period was provided when the Public Involvement Plan was revised.
- The Public Involvement Plan allows for timely information about transportation issues and processes. PSRC's public involvement process describes a website and media outreach, direct mailings, notification of news media, libraries, etc., to distribute information.
- The public involvement process provides public access to technical and policy information.
- The public involvement process provides public notice of public involvement activities and time for public review and comment.
- PSRC considers and responds to public input that they receive, such as demonstrated in the TIP. However, it is less clear if responses were documented during public comment periods of Board meetings.
- PSRC's Public Involvement Plan describes the strategies and a "process" for public participation. However, there is no documentation that PSRC engages those traditionally underserved (minority and low income) communities and those individuals with limited English proficiency. While the plan does identify engaging those communities and individuals, it does not describe the "process" or "strategies" with which they seek to bring minority and low income communities and individuals with limited English proficiency into the planning process.
- PSRC uses many methods for evaluating the public involvement process. It appears that the only basic change to the original plan (May 1994) was adding PSRC's web page. Also, it appears that many of the strategies and processes that PSRC currently uses may not be captured in the plan. In addition, the plan does not include a process for evaluating, and documenting the evaluation, of the strategies' effectiveness.
- The most impressive component of PSRC's outreach effort is the vision 2020 Award Program, which can perhaps serve as a model for how communities can be recognized for innovative linkages between transportation, land use and

economic development. The participation in terms of the number and quality of submissions had grown over the years. Showcasing these projects and the type of planning and investment that were required to achieve these results could be one of the driving forces for a new level of public participation and interest in transportation planning.

**Corrective Action:**

8. To better document PSRC's efforts, by the next UPWP update, provide FHWA and FTA documentation that will identify and address a systematic evaluation procedure of PSRC's public involvement process. The evaluations should document:

- (a) Evidence of citizen involvement in the planning process, sufficient to identify their impact on PSRC decisions;
- (b) Evidence that PSRC actively recruits private citizens to serve on its committees, task forces, etc;
- (c) Identification of public participation at the local agency level and how local agency public participation correlates to PSRC's overall regional planning processes;
- (d) Identification of the progress toward goals PSRC has established for public involvement;
- (e) The effectiveness of strategies aimed at reaching those goals;
- (f) The effectiveness of strategies for engaging traditionally underserved (minority and low income) communities in its transportation planning processes;
- (g) The effectiveness of strategies for engaging individuals with limited English proficiency;
- (h) The effectiveness of strategies for accessibility to public participation by disabled individuals.

**Recommendation:**

8a. It is recommended that PSRC continue to seek additional ideas on public outreach from other MPOs. Metro in Portland, Oregon and the Metropolitan Washington Council of Governments in Washington, D.C. are good resources. In addition, public involvement is discussed at many conferences (Context Sensitive Solutions, Walkable/Livable Communities, Title VI, Planning, Community Impact Assessment, et al) around the country.

8b. It is recommended that PSRC should identify best public involvement practices and activities and encourage an adaptive learning process in local government jurisdictions that need further assistance.



8c. Communication strategies should be employed to publicize the Vision 2020 Award-winning projects beyond the recipient jurisdictions and organizations.

**9. Title VI:** The metropolitan planning process is to be consistent with applicable nondiscrimination statutes such as Title VI of the Civil Rights Act of 1964 and the Title VI assurances which ensures that no person shall, on the grounds of race, color, sex, national origin, or physical disability, be excluded from participation in, be denied benefits of, or otherwise subjected to discrimination under any program receiving Federal assistance from the United States Department of Transportation.

**Finding:**

- PSRC is commended for its efforts to develop a Title VI Plan in April 2002. The April 2002 Title VI Plan was developed as a result of WSDOT's Title VI Coordinator's efforts to ensure MPO compliance. WSDOT's Title VI Coordinator provided training and assistance to PSRC in the development of its Title VI Plan. The Title VI Plan is essentially mirrored after the WSDOT Title VI Plan.
- As a part of its Title VI Plan, PSRC has developed complaint procedures. Formal Title VI complaints filed against PSRC must be submitted to WSDOT for processing.
- As noted in the Findings for Item 8: Public Involvement, above, PSRC has not identified strategies for engaging minority and low-income communities in its planning processes.
- PSRC has not identified strategies for engaging individuals with limited English proficiency in its planning processes.
- PSRC has demographic information for determining composition of its communities (minority, low-income, limited English proficiency, et al). It does not appear that PSRC has a mechanism in place to assess the extent to which different socio-economic groups (i.e., minority populations) are beneficiaries of the investments identified in the transportation plan and TIP.
- PSRC utilized 1990 Census Bureau Data in its modeling, demographic studies, and in developing its TIP and MTP. Data available from school districts, Department of Social & Health Services, and other social service agencies has not been used.
- Federally-recognized tribes are non-voting associate members of PSRC. PSRC is working to increase Tribal participation including efforts in conjunction with WSDOT.

**Corrective Action:**

9. In order to more fully document the ongoing efforts PSRC is making toward effectively meeting the requirements of Title VI, it is important that PSRC revise their Title VI plan to document the following:

- a. A demographic profile (inclusive of race and income level) of its region, utilizing the most current data available (i.e., from census, school districts, Department of Social and Health Services (DSHS), and other available resources).
- b. A description of the process for assessing the distributional effects of the transportation investments in the region and how that process is used in selecting projects and developing the TIP, MTP, and other documents.
- c. Specific strategies used for engaging traditionally underserved (minority and low-income) communities in the transportation planning process.
- d. Specific strategies used for engaging individuals with limited English proficiency in the transportation planning process.
- e. Specific strategies used and framework for engaging Tribal Governments in the transportation planning processes.

An outline on how PSRC will accomplish the Title VI corrective actions will be included in the next UPWP update.

Within one year of the date of this report, PSRC will provide FHWA and FTA a revised Title VI Plan demonstrating that the corrective actions have been addressed.

**Recommendation:**

- 9a. PSRC should review its facilities, programs, activities, policies, and practices for compliance with Section 504 of the Rehabilitation Act and the American with Disabilities Act.
- 9b. PSRC should better diversify its committee(s) structure to be more representative of the communities they serve (including disabled, minority, elderly, and low-income individuals).
- 9c. Revise complaint procedures to insure that Title VI complaints filed against PSRC are forwarded to the appropriate jurisdiction (WSDOT, FTA, or FHWA) for processing.

**10. Congestion Management System (CMS).**

**Requirements:**

Title 23, United States Code – Highways “Congestion Management System. – Within a transportation management area, the transportation planning process under this section shall include a congestion management system that provides for effective management of new and existing transportation facilities eligible for funding under this title and chapter 53 of title 49 through the use of travel demand reduction and operational management strategies.” (§134 (i) (3) Congestion Management System.)

23 CFR 500 – Management and Monitoring Systems, Subpart A—Management

Systems. "The metropolitan transportation planning process (23 U.S.C. 134 and 49 U.S.C. 5303-5005) in TMAs shall include a CMS that meets the requirements of §500.109 of this regulation." (§500.105 (a))

By regulation, October 1, 1997 was the date for all MPOs that are TMAs to have a CMS fully operational.

**Definition of parameters for measuring the extent of congestion (Performance measures and Thresholds) (§500.109(b)(2))**

**Finding:**

- There is evidence of performance measures being established by WSDOT, PSRC, and local agencies. However, establishment of performance measures is not well documented.

**Establishment of a program for data collection and system performance monitoring (§500.109 (b)(3))**

**Finding:**

- Although some monitoring has taken place, there is no documentation that a reasonable analysis was used in identifying causes of congestion.

**Identification and evaluation of the anticipated performance and expected benefits §500.109(b)(4)**

**Finding:**

- Although identification and evaluation of the anticipated performance and expected benefits of strategies has taken place in many areas, documentation of these areas is lacking.

**Identification of an implementation schedule, implementation responsibilities, and possible funding sources for each strategy (§500.109(b)(5))**

**Finding:**

- The relationship between the mobility enhancement projects identified by WSDOT in the State Highway System Plan and how those projects were developed through PSRC's CMS is not documented clearly.

**Implementation of a process for periodic assessment §500.109(b)(6)**

**Findings:**

- While there appears to be periodic assessment of some CMS strategies, there is no documentation of a specific "process" to assess the efficiency and effectiveness of implemented strategies for the CMS highway network.

**Corrective Action:**

10. The following items must be addressed:

- a. Although performance measures have been established by WSDOT, PSRC, and local agencies, performance measures need to be fully established and documented for all transportation facilities eligible for funding under Title 23 and 49.
- b. Documentation is needed to establish that a reasonable analysis was used in identifying causes of congestion. Identification and analysis of these causes of congestion must be better documented for all transportation facilities eligible for federal funding.
- c. Better document the identification and evaluation of the anticipated performance and expected benefits of strategies.
- d. The relationship between the mobility enhancement projects identified by WSDOT in the State Highway System Plan and how those projects were developed through PSRC's CMS must be clearly documented.
- e. There must be better documentation of a process to assess the efficiency and effectiveness of implemented strategies for the CMS. Further, there must be documentation of the results of the assessment.
- f. There must be better documentation of how all the steps of the CMS operate together and how the CMS requirements are met by the planning process.

An outline on how PSRC will accomplish the CMS corrective actions will be included in the next UPWP update.

Prior to the next MTP update, PSRC will provide FHWA and FTA a document demonstrating a fully operational CMS.

**Recommendation:** None.

**11. Metropolitan Transportation Plan (MTP):** This is the official intermodal transportation plan, developed and adopted through the metropolitan transportation planning process for the metropolitan planning area.

**Finding:**

- PSRC's General Assembly adopted the *Destination 2030* (MTP) on May 24, 2001.
- The Plan addresses over a 20-year planning horizon.
- The Plan includes ten-year investment program (2010 action strategies) as well as long-range investments (2011 to 2030).
- The Plan identifies the projected transportation demand of people and goods in

the metropolitan planning area through 2030.

- The Plan generates congestion management alternative strategies in addressing current and future transportation demand. The strategies include the following: improve the efficiency of the arterial system; improve the comfort, convenience, safety and reliability of transit service, while reducing operating expenses, environmental impacts, and reliance on single-occupancy vehicles; continued expansion of the freeway management system; expand the use of public and private vanpooling; Park and Ride expansion; high capacity transit; support for the region's vehicle trip reduction programs through education, promotion and marketing; car sharing; invest in 83 new miles of arterial HOV lane miles and 329 freeway HOV lane miles by 2010; invest in 11 new miles of arterial HOV lane miles and 254 freeway HOV lane miles by 2030; and development of an integrated ITS for traveler information and management technology.
- Maps 9 and 10 show the regional non-motorized (bicycle and pedestrian facilities) improvements over the period of the Plan. Priority investments will complete the non-motorized system by filling gaps in the existing network, creating connections to, and within, Urban Centers, and developing inter-modal connections.
- The Plans first priority is to maintain, preserve, make safe, and optimize existing transportation infrastructure (roads, rail, transit and ferries) and services (ferries and transit). The Financial Strategy Summary (Table 7, page 82,) identifies the funding for basic needs (maintenance, preservation, operation, safety and debt service), system expansion and planned investments. It also estimates current law revenue, new revenue, and funding shortfalls.
- Appendix 9 lists ferries, non-motorized, transit, and roadway projects. Design, concept and scope descriptions of proposed projects are in sufficient detail to permit conformity determinations.
- A multimodal evaluation of the transportation, socioeconomic, environmental, and financial impact of the overall Plan was conducted through a draft Environmental Impact Statement analyzing three planning alternatives. PSRC considered public comments in providing direction of the Plan.
- A key part of the Plan links land use and transportation. The Plan promotes design guidelines for designated Urban Centers and high capacity transit station centers. The guidelines include encouraging a mix of complementary land uses, particularly uses that generate pedestrian activities and transit ridership; encouraging compact growth by addressing planned density; linking neighborhoods; connecting streets, sidewalks, and trails; integrating activity areas with surrounding neighborhoods; and locating public and semipublic uses near high capacity transit stations in designated urban centers and activity centers.
- The Plan does not highlight proposed transportation enhancement activities other than bicycle and pedestrian.
- The Plan addresses safety of the transportation system.
- PSRC, FHWA and FTA made an air quality conformity determination in accordance with the Clean Air Act and EPA regulations.

**Corrective Action:** None.

**Recommendation:**

11a. The candidate/approval process appears to be confusing. We suggest PSRC try to clarify the process.

11b. Although PSRC addresses safety of the transportation system throughout the MTP, both FHWA and FTA make safety a high priority. In PSRC's next MTP update, we strongly encourage PSRC to be more explicit in the safety area.

11c. In the next MTP update, transportation enhancement activities should be more fully addressed.

**12. Transportation Improvement Program (TIP):**

**Finding:**

- The metropolitan planning process includes development of the TIP for the metropolitan planning area in cooperation with WSDOT and public transit operators.
- The TIP is updated every two years and approved by PSRC Executive Board and the Governor (Page I-4).
- PSRC, as well as FHWA and FTA, made an air quality conformity determination on the TIP and TIP amendments in accordance with the Clean Air Act and EPA regulations.
- Opportunity for public comment was available during the development of the TIP. Public comments are recorded and posted in Appendix B of the TIP.
- The TIP identifies the year each project is programmed.
- Exhibit 5, 6 and 7 identify the funds by source and expenditures compared with revenues indicating a financially constrained TIP.
- The TIP included all transportation projects including pedestrian walkways, bicycle transportation facilities, and transit projects proposed for funding with federal funds.
- It appears that all projects in the TIP are consistent with the MTP, including all proposed regionally significant projects, regardless of funding source. However, there is confusion regarding the candidate/approved process and how it relates to the projects in the MTP.
- Sufficient descriptive material, total cost estimates, source of federal and non-federal funds, and agency responsible for carrying out the project are included for each project.
- Appendix C identifies the project selection process. The criteria (purpose and need) and process for prioritizing implementation of transportation plan elements for inclusion in the TIP is unclear.

- The TIP provides a summary (p. H-1) of the obligated projects from the previous TIP. However, it is difficult to see if these were any significant delays in the planned implementation of major projects.
- The TIP is amended monthly.
- A summary of PSRC's public comments and their responses to the comments is displayed in the Appendix B of the TIP.

**Corrective Action:** None.

**Recommendation:**

12a. To eliminate the confusion of the candidate/approval process, in an introductory section to the TIP, clarify the process for candidate/approval and how this relates to the MTP.

12b. Clearly identify when (month, year) the TIP becomes effective to avoid confusion between State FY, Federal FY, and calendar year.

12c. Create a simplified flow chart in colored pamphlet format for a citizens audience so they know how to influence their jurisdiction's commitment to proposing projects and how PSRC, WSDOT and the Federal government make choices on which projects to fund and how citizens can comment at each stage of the process.

12d. In order to clearly identify any significant delays in the planned implementation of major projects, we suggest the TIP include a similar format of the obligated projects on pages H-1 to H-14.

### 13. Travel Demand Forecasting

**Finding:**

- *Destination 2030* and the *Land Use and Travel Demand Forecasting Models* reports appear to be excellent in both their practice of travel demand forecasting and their documentation.

**Corrective Action:** None.

**Recommendation:** None.

**14. Air Quality/Conformity:** Areas that are classified as nonattainment for transportation related pollutants must develop a MTP and TIP that conform to the State Implementation Plan (SIP). The SIP establishes conformity criteria and procedures consistent with the Clean Air Act (CAA) Amendment of 1990 and EPA conformity regulations. Conformity to a SIP is defined in the CAA as "conformity to an implementation plan's purpose of eliminating or reducing the

severity and number of violations of the national ambient air quality standards and achieving expeditious attainment of such standards.” A review and evaluation of the process used to meet conformity requirements in nonattainment and maintenance areas are required. Air quality issues must be addressed in all metropolitan transportation planning processes, and the process used to address these issues should be evaluated as part of the planning certification process. Evaluation of the process used by the MPO to ensure conformity of plans and programs are an important and discrete part of the certification review.

**Finding:**

- Overall the air quality analysis documentation was very well done. The Tier II adjustment factors for Gasoline and Sulfur have contributed greatly to lower predicted emissions.

**Corrective Action:** None.

**Recommendation:**

14a Under “Technical Analysis Procedures” and “Modeling Assumptions” of the TIP we request that the next TIP and MTP updates discuss the recent guidance (January 18, 2001) issued by EPA and DOT on the use of the latest planning assumptions.

14b. Tables showing the results of model analysis should footnote the source of the emissions budget by document name and approval date (SIP, February 30, 1972).

**15. Intelligent Transportation Systems (ITS):** TEA-21 reinforced the Federal commitment to manage and operate the nation’s transportation system. The law encourages and promotes the safe and efficient management and operation of integrated, intermodal surface transportation systems to serve the mobility needs of people and freight, and foster economic growth and development.

**Finding:**

- PSRC is implementing the final rule to develop the ITS Regional Architecture.

**Corrective Action:** None.

**Recommendation:** None.



## IV. 1999 Review Findings

Below is the status of the 1999-certification review findings:

### A. Agreements/Memorandums of Understanding (MOU)

#### 1999 Recommendation:

The agreement with WSDOT needs to clarify the role and responsibility of PSRC with relation to the Marine Division and vice-versa. This should include how planning will be coordinated.

**2002 Finding:** The Washington State Ferry System is a member of the Transportation Operators Committee (TOC) and is represented by WSDOT at a policy level.

#### 1999 Recommendation:

The agreement with the Puget Sound Air Quality Authority and Washington State Department of Ecology should be updated to describe their respective roles and responsibilities for assuring that the MTP and TIP conforms to the air quality goals of the State Implementation Plan (SIP).

**2002 Finding:** A December 2001 MOU between Puget Sound Air Quality Authority, Washington Department of Ecology, and PSRC was signed and implemented which addresses the respective duties and responsibilities of the Clean Air Agency, Ecology and PSRC in developing 10-year air quality maintenance plans designed to ensure continued attainment of the National Air Quality Standards, and also addresses the duties and responsibilities of the agencies for preparing the air quality conformity analyses of the metropolitan transportation plan (MTP) and the transportation improvement program (TIP), to ensure that the MTP and TIP conform to the air quality goals of the State Implementation Plan (SIP).

### C. Project Selection and Transportation Improvement Program (TIP)

#### 1999 Recommendation:

PSRC should continue to work with WSDOT to resolve project development and TIP development-timing issues.

**2002 Finding:** PSRC has issued a *Policy Framework for the 2002 TEA-21 TIP Process* which reflects stronger and more direct policy support for implementation of the 2001 regional transportation and growth strategy plan (MTP). The policy framework contains guidance for WSDOT for preparation of its program of state managed projects that will be included in the TIP.

### D. Public Involvement

#### 1999 Corrective Action:

23 CFR 459.316b(1)(ix) requires MPOs to periodically review the public involvement process in terms of their effectiveness to assure that the process provides full and open access to all. While PSRC continuously reviews and revises their public involvement process, the

documented plan has not been revised or updated since 1994. PSRC should update their adopted public involvement plan to reflect their current public involvement practice.

**2002 Finding:** PSRC has revised and updated their public involvement process - *Public Participation Plan for the Puget Sound Regional Council*, adopted April 25, 2002. However, the public involvement plan does not document whether an evaluation of their effectiveness was conducted. Overall, adding the Regional Council's Web site to their public involvement procedures was the basic change even though it appears that PSRC is using other strategies in their current practice. See Section III, Public Involvement findings.

**1999 Corrective Action:**

Because public involvement is critical at the earliest stages PSRC should establish some means (basic parameters, guidelines, etc.) for assuring that the early public involvement completed at the local level by local agencies accomplish the goals of their public involvement policies.

**2002 Finding:** Although it appears that it is taking place, based on the updated public involvement plan, PSRC does not have a means for assuring that local agencies accomplish their public involvement goals. See Section III, Public Involvement findings.

**1999 Recommendation:**

PSRC should review and better define effective and efficient ways in their public involvement plan strategies utilized for engaging minority, low-income and the under served members of the public in transportation decision making.

**2002 Finding:** PSRC's April 25, 2002, Public Involvement Plan does not adequately address this item. Unlike other strategies of the public involvement plan which also identify a "process", the plan does not identify a "process" or "how" to seek out and consider the needs of those traditionally underserved by existing transportation systems, including but not limited to low-income and minority households. See Section III, Public Involvement findings.

## **G. Air Quality**

**1999 Recommendation:**

As stated in Recommendation A3, the agreements with the Puget Sound Air Quality Authority and Washington State Department of Ecology should be updated to reflect conformity requirements.

**2002 Finding:** A December 2001 MOU between Puget Sound Air Quality Authority, Washington Department of Ecology, and PSRC was signed and implemented which addresses the respective duties and responsibilities of the Clean Air Agency, Ecology and PSRC in developing 10-year air quality maintenance plans designed to ensure continued attainment of the National Air Quality Standards, and also addresses the

duties and responsibilities of the agencies for preparing the air quality conformity analyses of the metropolitan transportation plan (MTP) and the transportation improvement program (TIP), to ensure that the MTP and TIP conform to the air quality goals of the State Implementation Plan (SIP).

## **H. Congestion Management System (CMS)**

### 1999 Corrective Action:

PSRC believes that some congestion is considered tolerable. However, the level of performance deemed acceptable by type of transportation facility, geographic location, and/or time of day needs to be established. The level of acceptable congestion (thresholds) should be established cooperatively with the State, local officials in consultation with the operators of major modes of transportation in the coverage areas.

**2002 Finding:** Although many have been identified, performance measures have not been fully established for all transportation facilities eligible for funding under Title 23 and Title 49.

### 1999 Corrective Action:

A system performance-monitoring program has been established for data collection over certain segments of the transportation system during weekdays only. Non-work weekend travel is becoming a major congestion issue and should be addressed.

**2002 Finding:** The *1999 System Performance Report* establishes the critical congested segments that PSRC believes are important – AM & PM commutes – and does not address non-work weekend travel.

### 1999 Corrective Action:

Although performance monitoring is taking place on certain transportation segments, analysis of the collected data and identifying the causes of congestion is needed.

**2002 Finding:** PSRC's 1995 System Performance Report does not cover all the transportation system that is eligible for federal funding under Title 23 and 49.

### 1999 Corrective Action:

While various CMS strategies are implemented, including those independently implemented by transit agencies and local jurisdictions, evaluation and monitoring of the CMS strategy/action effectiveness are needed.

**2002 Finding:** Appendix B of the *1999 System Performance Report*, describes the performance of various segments in the transportation system. Again, many of the tables contain only one or two years of data, so volume trends cannot be established.

1999 Corrective Action:

Coordination of CMS strategies by PSRC and other agencies of the identified CMS region need to be clearly defined and integrated to produce the most efficient and effective transportation system in the Puget Sound Region.

**2002 Finding:** See Section III, CMS 2002 Review Findings.

1999 Recommendation:

Develop and establish a time-line schedule which identifies and describes how each of the above corrective actions will be implemented as part of PSRC's CMS and addressed in the 2001 MTP update.

**2002 Finding:** See Section III, CMS Review Findings.

## V. Public Comments

From: Jean Amick <[jeanseattle@earthlink.net](mailto:jeanseattle@earthlink.net)>  
Date: Tue, 17 Sep 2002 16:55:42 -0700  
To: <[mgulbranson@psrc.org](mailto:mgulbranson@psrc.org)>  
Cc: Ed Murray <[murray\\_ed@leg.wa.gov](mailto:murray_ed@leg.wa.gov)>, Doug MacDonald <[macdond@wsdot.wa.gov](mailto:macdond@wsdot.wa.gov)>, Aubrey <[adavis@wsdot.wa.gov](mailto:adavis@wsdot.wa.gov)>, Richard Conlin <[Richard.Conlin@ci.seattle.wa.us](mailto:Richard.Conlin@ci.seattle.wa.us)>, Ted Lane & Cheryl Thomas <[ThomasLane@msn.com](mailto:ThomasLane@msn.com)>, Pat Thibaudeau <[thibaude\\_pa@leg.wa.gov](mailto:thibaude_pa@leg.wa.gov)>  
Bcc: Scott Gibbons Amick <[scottgsea@yahoo.com](mailto:scottgsea@yahoo.com)>, Mark Nagle <[mnagle@expedia.com](mailto:mnagle@expedia.com)>  
Subject: Comment on Region's Transp Planning Process

Dear PSRC:

Thank you for this opportunity to comment.

I want to inform the FHWA and FTA that our region and state are negligent in planning. Where was I-5 preservation funding three years ago? Where is it now?

I-5 is past its 40 year lifespan having seen more traffic than ever expected YET the legislature and WSDOT have set aside no funding in past years to plan for preservation of it, yet they knew its surface lifespan! It is worn out in the north and south parts from Shoreline down to Federal Way.

Why does our state allow stud tires? There are many modern, safe tires which do no damage to our road surfaces yet our electeds are not courageous enough to outlaw studs.

Is this responsible planning? R-51 has no mention of repaving I-5, and the Regional Transportation package being worked on for a spring vote has no mention of it. How can this state take millions of our/yours/my tax dollars and propose more road construction when we cannot keep what we now have in decent shape.

Where will we be in 2030...riding washboard-like highways as now? Hope not. Maybe FHWA and FTA can guide this state to prioritize highway and transit dollars.

Sincerely,

Jean G. Amick  
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From: hubsmtg.gwhub:"[Patricia.Otley@bnsf.com](mailto:Patricia.Otley@bnsf.com)"  
To: hubsmtg.gwhub:"[mgulbranson@psrc.org](mailto:mgulbranson@psrc.org)"

Subject: PSRC Review

Upon returning to town today, I learned that the PSRC is in the midst of a certification review during which public comment is appropriate, and I regret these thoughts are not reaching you in advance of that process.

We are aware that the PSRC has been involved in a number of commendable efforts for many years, but want to especially applaud the leadership it has provided in the area of freight mobility, a concept which had little currency until the Freight Mobility Roundtable was formed. Burlington Northern Santa Fe Railway places great value upon communities which understand the relationship of the movement of freight to the economy of a region and the Roundtable has been instrumental in helping our citizens and our public officials make those connections. Further, the Roundtable has played a significant role in advancing a number of actions which tangibly demonstrate the interest of the region in efficient freight transportation systems. An outstanding example is the FAST Corridor which has served to make this region more competitive but which has also allowed innovative partnerships to be created, a public-private model which foundation is based on Roundtable membership.

BNSF operates in 31 states and provinces. As our representative to the Roundtable, I have more questions put to me by people in other states about "why- how-what?" the Roundtable than any other effort in which I've been involved. The PSRC broke new ground when it created the Roundtable, BNSF will continue to participate in and value the work of the Roundtable, and we vigorously endorse continued PSRC sponsorship.

I appreciate the opportunity to make these brief comments, and would be glad to respond further if that is appropriate or desired.

Pati Otley  
Burlington Northern Santa Fe Railway, Seattle  
625 6063

## COMMENTS ON PSRC PLANNING REVIEW

By Dick Nelson

9-16-02

I'm a former member of the House Transportation Committee of the Washington State Legislature. I was a co-sponsor of the Growth Management Act and related transportation planning bills, and legislation establishing RTA.

For the past 10 years I've been professionally involved in urban transportation studies. You could say I'm a consumer of PSRC products.

A MPO has many official functions and duties: among them are planning in compliance with federal and state rules, developing the TIP, determining conformity to air quality standards, tracking transportation projects, maintaining a regional database, and encouraging innovative transportation programs and land uses.

I'd like to believe that there is another duty, perhaps not officially established, but equally important. It may fit the topic of public involvement. That duty is to clarify for the public and decision makers the benefits, cost, and trade-offs inherent in major investment decisions. These major decisions usually involve public votes that authorize new programs and taxes. Trade-offs include alternatives that may have lower costs and equal or greater benefits. This is actually a requirement for the MPO written in Washington state law.

An associated duty is to track the development of major programs and comment appropriately when benefits and costs change under new circumstances and with new information.

In other words, the MPO should be an independent and proactive voice that assures that major programs are, and continue to be, cost-effective and consistent with regional planning goals, including a commitment to deliver benefits within realistic fiscal constraints. Because of an ever-changing political environment, there is a need for the PSRC to move more actively undertake that role.

Here are some of the recent changed circumstances:

- a. This region is about to construct a light rail starter segment that is now twice as expensive, half as long as initially promised, and years behind schedule.
- b. The long-range vision of a 125-mile regional light rail system has, because of cost, been apparently abandoned in favor of an express bus network.
- c. Through the public initiative process, voters will be asked this November to approve a city-wide monorail system, with possible regional extensions. The citywide system, if fully realized, could cost upwards of \$7 billion. Monorail planning has not been integrated with other regional transportation planning.
- d. Given new and more probable cost estimates for major roadway

- projects, a large financial gap will remain even should voters approve both a state package and a regional package.
- e. Even as efforts move forward to expand available revenues, other efforts are underway, using the state initiative process, to curtail and earmark revenue sources.
  - f. Major unresolved differences of opinion exist among members of the public as to the impact of additional roadway capacity on travel demand. Some see road capacity as inducing more travel and growth, and hence they oppose higher taxes.
  - g. New information on nonwork activities, which are the major driver of travel demand and automobility in the region, holds major implications for transportation and land use strategies. But nonwork patterns are poorly understood and seldom acknowledged by the public, decision makers, and planners.

Each of these suggests the need for a regional discussion that would help inform the public and policy makers as they face investment decisions that total in the tens of billions.

This is not intended to be a critique of the knowledge and professional abilities of the PSRC staff. I know that they are capable of commenting on and otherwise addressing these important regional issues. The regional planning process should be designed to encourage their engagement. And it should be a neutral forum that allows the airing of differences of opinion and a search for greater understanding and agreement.

It is a call for the PSRC to move out of the safe zone it has settled into, so that the skills and knowledge of its planners can be used to inform the transportation/land use debate. If that doesn't happen, one can ask what real relevance it has beyond being a compiler of regional data.

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September 18, 2002

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September 16-20, 2002  
PSRC Certification Review

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The discussion yesterday on air quality and conformity at the PSRC Certification Review focused on specific issues and I wanted to provide more general comments.

With PSRC in a lead role, the region administers a strong conformity program. The MOU referenced in Attachment #3 clarifies the formal structure that supplements the federal and state conformity regulations, however, the real strength of the program is in the:

- frequent, informal consultation that occurs at all levels of the participating agencies;
- collaborative approach that has been fostered by USDOT in this region; and
- professional and objective analysis by staff who operate the MOBILE models.

The general purposes of conformity can be briefly summarized as follows:

- to ensure that SIP MVEB/targets for attainment and maintenance are met, and reinforce SIP goals for clean air;
- to ensure that the MTP, TIP, and projects contribute to emission reduction strategies;
- to ensure timely implementation of TCMs;
- to provide a process for transportation and air quality agencies to consider long-term impacts from transportation plans, programs, and projects;
- to provide a forum for debate on air quality impacts of proposed transportation investments and how air quality and mobility goals should be reconciled.

The discussion yesterday focused on the first 3 purposes, and I would like to bring some broader air quality issues to your attention under the last 2 purposes:

- Air quality concerns are shifting from CO & PM<sub>10</sub>, to fine particulates, (PM<sub>2.5</sub>), and toxics; while ozone (O<sub>3</sub>) remains a concern. Mobile sources are major contributors to these pollutants.

Daniel M. Mathis, P.E. – Federal Highway Administration  
R. F. Krochalis – Federal Transit Administration  
September 18, 2002  
Page Two

- Conformity is a useful tool, however we may be using it in ways that it is not well suited for, to the detriment of air quality. The following 2 examples illustrate this concern:
  1. CMAQ Projects – Conformity has created a VMT focus in project analysis that under-represents the air quality benefits of projects that produce direct and immediate emission reduction, but do not affect VMT, e.g., alternative fuel vehicles.
  2. Major Projects and Mitigation – Major projects, such as the I-405 corridor program and multiple pavement resurfacing projects on I-5, impact air quality and require mitigation, but do not fit neatly into the conformity structure. (We have a consultation process underway to address this issue.)
- Better tracking of TCMs, CMAQ, and other projects would be beneficial because the design year and horizon year may not be the year in which we are at greatest risk for exceedances of National Ambient Air Quality Standards.
- CMAQ process may not be maximizing the emission reductions because of the projects that get selected – this is a national and structural problem of the program.

Thank you for the opportunity to comment. If you have any questions or desire additional information, please contact me at (206) 689-4085 or [paulc@psccleanair.org](mailto:paulc@psccleanair.org).

Sincerely,



Paul D. Carr  
Air Resource Specialist

PDC/lh

cc: Dennis McLerran/PSCAA  
Dave Kircher/PSCAA  
John Anderson/PSCAA