Eastside Transportation Association

"Dedicated to improving our quality of life and environment by reducing congestion through increased mobility"

P.O. Box 50621
Bellevue, WA 98015

July 30, 2009

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

Re: ETA Comments on PSRC Transportation 2040 DEIS

Dear Mr. Ardussi:

The Eastside Transportation Association (ETA) is pleased to provide our comments in response to the DEIS for the PSRC Transportation 2040 Plan. Before getting into our specific comments we would first like to express our disappointment that no alternative was selected that would test unconstrained travel demands in the region and the most cost effective means of meeting this demand. Unfortunately it appears that alternatives were limited to a range of choices that planners believe to be more politically acceptable and require substantial changes in travel behavior from present conditions. Said differently, it appears the plan is more focused on an outcome that deliberately favors certain transit modes, regardless of cost or reasonable market share assumptions.

Our specific comments are summarized as follows:

COST and PERFORMANCE

1. Pages 1-7 and 3-8 graphically show program investments, but without numbers. There is no detailed tabulation of investments by program element anywhere in the DEIS, including Appendix A.
    a. The graphics appear to be consistent with page 1-13's investment of $143 billion for the Baseline and $201 billion for Alt. 2.
    b. Scaling the graphic on page 1-7 suggests that Alt. 5's investment would be about $196 billion.
2. The Transportation 2040 DEIS documents do not provide a way to compare the costs of the individual proposed actions to their performance. *For a document that is intended to inform the decision makers, this is a serious deficiency.*
3. Exhibit 4-27 on page 4-66 shows that Alt 5, for example, would increase AM and midday bus hours by 18% over Baseline, LRT by 144%. What investment would be required for each and how many new riders would be served by each? Why are PM data not shown?

TRANSIT MARKET SHARE

1. The graphics on pages 1-7 and 3-8 indicate that from about 48% to 59% of the investments would be for transit. How can this be justified for the minor increases in transit's market share, as shown on page 4-61?
    a. For example, Alt 5 increases transit market share to 5.2% from the Baseline's 4.2% (Exhibit 4-25, page 4-61), and yet would spend about 59% of the $196 billion. This 1% shift to transit is equivalent to only one year for the projected growth in total travel from 2006 to 2040. The alternatives provided offer little for the other 29 years of travel growth, and little for existing congestion and delay problems.
    b. Because increasing trip lengths expand opportunities, both for jobs and other purposes, person-miles would be a better measure than person-trips. Converting to person miles would reduce transit's market share to about 2.1% for the Baseline and about 2.8% for Alt. 5.
2. Page 4-32, third line from the bottom, indicates 4.1% transit market share in 2006. However, the sum of work and non-work trips on Exhibit 4-26, page 4-64 indicates 2.9%. Why is there this difference?
3. Exhibit 4-26 on page 4-64 appears to mix transit boardings with person-trips for the other modes. That incorrectly exaggerates transit performance. See transit boardings on Exhibit 4-29, page 4-68. These boarding figures are close to, but not identical to the "transit" figures shown on Exhibit 4-26.
    a. The values on Exhibit 4-26 exceed the boardings on Exh. 4-29 by 3% to 6%. This discrepancy further exaggerates transit performance.
    b. With a transfer rate of 1.49 (see page C-6 Appx. C, ST2, July '08), transit trips would be about 33% fewer than boardings.
4. If the transit figures on Exhibit 4-26 are boardings, then the 5.2% transit mode share for Alt 5 on Exhibit 4-25 should be reduced to 3.5%.

ALTERNATIVES OFFERED

1. Why was there no alternative without a major rail and other transit investment, particularly given the embarrassingly small contribution of transit?
2. Exhibit 1-8, page 1-17, and Exhibit 4-20, p. 4-51 both show Alt. 5 to have the lowest delay of all the Alternatives. How can this be with Alt 5's emphasis on transit? Alt. 5 has about 305,000 fewer vehicle trips or about 475,000 person-trips no longer in cars. Alt. 5 adds only about 130,000 more transit person-trips (about 190,000 boardings). Please provide specific numbers on what happened to the other 345,000 person-trips (475,000-130,000). Were some of these 8± mile automobile person-trips converted to 1-mile pedestrian/bike trips with a drastically reduced set of destination opportunities? What key assumptions were behind this result? Was the added time required for transit trips compared to auto trips, included in the delay estimate? Some skepticism about these results is justified. If PSRC can, with a straight face, propose devoting half of investments

for transit with a market share less than 3%, it might well bias the complex calculations to favor transit.

3. Page 3-13 indicates that the Nickel and TPA packages are included in the 2040 Baseline, but the small lane-mile additions seem too small (see Exhibit 4-19 on page 4-46).
4. Vanpool expansion is mentioned on page 4-23. Where are the details? This could be as important, or more important than light rail in serving regional trips.
5. The table portion of Exhibit 4-22 on page 4-54 compares the alternatives to 2006, but the graphic portion compares alternatives to the 2040 Baseline. Why create this confusion? By what criterion is "Less is better" as shown on the y-axis of the figure? Increased trip lengths represent access to more opportunities, a public benefit.

TRAVEL and DELAY

1. In spite of the DEIS bias against VMT, increases in VMT represent a benefit to users by providing access to more opportunities.
2. Exhibit 4-20 on page 4-51 shows a reduction in daily vehicle trips compared to the Baseline, but no change in person-trips. How, specifically, was this reduction achieved?
3. From page 4-22, "It is estimated that this [CTR] reduced delay by 12% during the peak travel period on average mornings in the region." Who estimated this and how?
4. Page 4-24 describes a four-part congestion relief strategy. How much did each of these four contribute to congestion relief?
5. Exhibit 4-20 on page 4-51 shows a shorter non-work trip length of Alt. 5 compared to the Baseline. What specifically caused this? Does that reduction mean travelers have access to fewer destination opportunities?
6. Compared to the Baseline Alt 5 shows peak spreading, Alt 2 shows more concentration in peak periods (p. 4-53). How was this determined?
7. Exhibit 4-23 on page 4-57 confuses vehicle hours traveled (listed in title) with delay. The line "Total Delay" is the sum of freeway and arterial "Vehicle Daily Hours", as labeled.

TOLLING

1. Alt 1 toll revenues would be spent in the tolled corridor (see p. 3-19). Could those revenues be spent on transit?
2. Are revenues from tolls imposed on highway users protected by the 18th Amendment?
3. Alt. 4 would impose tolls on the entire roadway network. How would this be done? (See p. 3-27).
4. Some of the toll revenues of Alts 4 and 5 would be used for transit. Highway users revenues should not be used to further subsidize transit. All tolls on highway users should be used for highway improvements.

EMISSIONS

1. Comparison of Exhibit 1-17 (p. 1-24) and Exhibit 4-20 (p. 4-51) shows that CO_2 emissions roughly track VMT changes.

    a. This appears not to recognize improvements in fuel economy. By 2040, the U.S. automobile/light truck fleet will have been replaced with post-2016 vehicles, which, by President Obama's program, will be 25% to 30% more fuel-efficient. Increasing use of electric vehicles would further reduce CO_2 emissions,
    b. CO2 emissions per vehicle-mile traveled (VMT) for the 5 action alternatives are highest for Alt. 5 (the alternative with the most-extensive, and wasteful, rail program).

2. According to page 6-22, transit is not included in emissions estimates. How much would be added if transit were included? It should be clearer that the 26% reduction is from the State's 2020 forecast, not from the State's 2020 benchmark for which the reduction would only be 9%. Why are the VMT/capita values on Exhibit 6-11 different than the values on Exhibit 4-20?

ENERGY

1. P. 11-6. Exhibit 11-5 on page 11-6 does not include energy required by transit. How much would be added by including transit? What improvements in average fuel consumption were included in the estimates of Exhibit 11-5?

2. P. 11-8. In the section "How can the effect to energy be mitigated", what is the basis of the allegation that public transit saves energy? Bus transit uses more than automobiles per passenger mile. It is not clear that rail transit saves energy, particularly if the energy for manufacture and construction is included.

BENEFITS

1. Exhibit 4-34 on page 4-76 shows the highest commercial user benefits for Alts 3, 4, and 5. What assumptions led to this result?

2. Are the values shown in Exhibit 4-35 on page 4-85 in millions of dollars? The DEIS should explain how those time savings were derived. What were the key assumptions?

3. Exhibit 4-37 on page 4-88 shows annual accident reduction benefits. What was the basis for these estimates?

DEVELOPMENT/LAND USE

1. Exhibit 5-6 on page 5-12 shows that Alts 3, 4, 5 move away from small cities to large and Alt 2 reduces population in Metro Cities. How, specifically, were these results determined? Does this represent public desire or the bias of the transportation planners? The graphic on page 5-13 does not seem to match the table's results? By what criteria is "More is Better" concluded for the y-axis?

GENERAL COMMENTS

1. With information scattered over more than 1,100 pages, it is extremely difficult to see what travel improvements would be achieved and at what cost. The DEIS appears to have been designed to confuse and intimidate, rather than inform. How else can explain alternatives all of which spend half or more of the investments on transit for a transit market-share of 2% to 3%. Obviously, the DEIS strives to justify a pre-selected solution.
2. In general, this appears to be more of a sales document for coercing behavior change and extravagantly funding transit than a careful systems analysis supporting informed decisions.

Thank you for the opportunity to submit our comments and we look forward to your response.

Respectfully submitted,

Richard A. Paylor, Chair
Eastside Transportation Association