The Eastside Transportation Association finds The Washington Transportation Plan 2007 - 2026 -- in its "Public Comment Draft" form dated July 19, 2006 -- to provide some valuable data, including a noteworthy effort to educate on important complexities of the speed-versus-capacity issue.

 However, ETA respectfully submits that this referenced Draft is not a Plan at all.  Rather it is, at best, a somewhat jumbled admixture of data, objectives, quotations, projects and slogans, which, even when taken together, lacks both a unifying framework and also other essential elements required for genuine planning, on a minimally competent basis, particularly for a nominal Plan that is logically intended to guide investments of tens of billions of dollars over two full decades.

In order for the current mishmash to be refashioned into an even-minimally-useful document, for professional planning, ETA suggests that the Draft must be substantially refashioned so as to possess at least the following qualities:

    1.  **It should provide a clear vision with specific-and-measurable goals.**The Plan's stated goals are largely slogans, with no attempt to identify specific-and-measurable targets.  Such a target would, for example, require reducing congestion by "x" percent over "y" years.

     2.  **It should define a process that identifies key problems, sets out alternatives for resolving those problems, and selects the most cost-effective of such alternatives.  Furthermore, it should be driven by factual data, not by planning theory.**The Plan recommends (on page 45) that $25.9 billion be spent on a specific list of "Unfunded High Priority Targets," but, since there is no overall cost-benefit measure, it is unclear that averred benefits of spending this money would exceed $25.9 billion.  Without knowing that it will, no reason exists for taxpayers to vote to endorse that level of spending.  Further, the Plan is lacking in evidence that this is the best or most cost-effective set of projects on which to spend that money.  There may well be another set of projects that could achieve the same level of benefits at a lower cost -- and, perhaps, at a substantially lower amount -- or could achieve greater benefit for the same-or-lower costs.  Without this quintessential information, why should voters endorse this particular set of projects (especially when page 64 says : "Accountability is essential" providers must base infrastructure investments on performance measurement and performance-based decision-making)?   If that is the case, then the Plan should provide a cost-effectiveness estimate for **each** of the proposed investments or projects and show how that performance metric was used for the decision-making that resulted in the list of "Unfunded High Priority Targets."  Page 2 says:  "Improved transit systems, including fuel efficient rapid rail, are a necessity."  However, neither evidence for nor testing of that bald assertion with data are not presented in the fashion required by ordinary standards of fiscal rectitude and of intellectual honesty.

     3.  **It should be responsive to the conclusions from WSDOT's recently completed Congestion Relief Study.**This study is referenced and summarized starting on page 111, but there is no apparent tie between study results and the Plan.  In fact, the Plan continues to imply that enormous rail-transit investments are actually doing something useful toward a real resolution of severe mobility problems in the greater Seattle area when much-available-but-omitted evidence strongly implicates precisely the opposite (with immensely adverse financial consequences for taxpayers there, for example, from $6 billion in taxes collected and otherwise obligated by Sound Transit to this date for little, **if any**, actual congestion relief).

     4.  **It should provide an assertive, top-down, leadership role for WSDOT in all planning for the highways of statewide significance (HSS).**  ETA believes that WSDOT is largely shifting with the political winds, currently, with adverse consequences for citizens.

    5.  **It should provide a strategic plan for HOV/HOT.**  The Plan appears to do no more than continuing with previous plans, which have not been derived from rigorous analysis.  A strategic plan would recognize and discuss inconvenient truths involving, at a minimum,

a. growing evidence that HOV lanes have done little to increase actual ridesharing (the original objective), but rather appear to be primarily serving "fam-pools," at present, which would exist with or without HOV lanes; and

b. very high cost of providing exclusive HOV lanes through interchanges.

     6.  **It should address the issue of equity and "balance" in transportation investments.**In the Puget Sound Region, half of our transportation investments through 2030 are for transit, with a current market share of 2.6% of daily trips (with expected growth to 4.6% by 2030 by the Puget Sound Regional Council).  The roadway system, with a 97% market share also gets half.  That is **not** balance.  The Plan does not address this issue.

     7.  **It should provide criteria for defining acceptable levels of risk, including, for example, seismic risks.** The Plan would commit a large amount of funding to retrofits.  It is not clear if the criteria are unduly conservative, eliminating more cost-effective alternatives.

     8.  **It should present a plan for dealing with very serious deficiencies of I-5.**I-5 is in fact badly broken and needs to be fixed!  The Plan barely addresses I-5, except on page 66 (Columbia River Crossing), and on page 68 (freight improvements).  These may be important projects, but they hardly begin to address the primary deficiencies of I-5 currently.  In contrast, the Plan devotes a great deal of attention to the Alaskan Way Viaduct, a far less important transportation corridor and facility.

    9.  **It should develop Transportation and Land Use rhetoric.**The Plan discusses this rhetoric beginning on page 119. However, that discussion and other mentions within the Plan  provide no information on the realities of this complex issue (beyond the level of facile rhetoric).  Rather, the Plan continues the misguided implication that quite modest increases in density will magically alleviate travel problems in this state.  This implication is simply not substantiated by anything approaching genuine analysis.

    10.  **It should recognize and quantify the gigantic financial implications of the Plan (after incorporating the nine suggestions set forth hereinabove).**The Plan quotes Hon. Patty Murray (on page 24) for the important proposition that "If we make the right investments in transportation, we will create millions of jobs here at home, we'll make our businesses and workers more productive and we'll lay the foundation for our further economic growth."  Yet, it does **not** deal with enormous harms being done to state taxpayers, **currently**, by repeatedly making the wrong investments in transportation, which are wasting billions and billions and billions of limited dollars, through failures to employ even the most basic of those cost-benefit practices required to fulfill all elementary fiduciary duties owed to every citizen of this state.

Respectfully submitted,

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                    Will Knedlik, Secretary, Eastside Transportation Association

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