

# APPENDIX M:

## Addendum to the 2012 Whatcom Transportation Plan

A draft plan was available for public comment at least two weeks prior to a public hearing held by the Whatcom Transportation Policy Board. Access to the draft plan was available through the Whatcom County Library system, on-line at the WCOG web site, [wcog.org](http://wcog.org), and a physical copy was available at WCOG offices. The comment period ended with the public hearings June 26, 2012, after which, the plan was adopted in its entirety. All public access to the draft plan was consistent with the adopted WCOG Public Participation Plan.

During the open comment period for the Whatcom Transportation Plan, no comments were received from the public at large. There were previous comments from Washington State Department of Transportation, and from the Federal Highway Administration. Those comments and WCOG staff responses to them are included in the following pages of this addendum.

*June 8, 2012*

### **WCOG Responses to WSDOT Comments on the WCOG 2012-2032 Metropolitan - Regional Transportation Plan**

*WCOG Staff Response: For record, the following WSDOT comments are based on an early draft of the plan that was submitted early at the request of WSDOT and FHWA. Prior to receipt of these comments, substantial additional information and edits were added to the plan, many of which addressed the comments outlined below, prior to receipt of them. This is true for both WSDOT and FHWA comments.*

#### **Background**

The WSDOT Northwest Region Mount Baker Office previously coordinated and compiled comments from the Aviation Division, the Community Transportation Planning Office, and Capital Program Development and Management Division and provided written comments on May 2, 2012 (attached to email).

WCOG Staff Response: Mt. Baker Office compilation of comments was responded to soon after being received. Some comments were incorporated, some were not due to applicability and excessive information contravening the concise nature of the plan. This information was provided to the Mt Baker Office.

WSDOT concludes that the draft WCOG 2012-2032 Metropolitan Transportation Plan, substantially meets the federal and state regulations for developing a long-range transportation plan, for both the metropolitan transportation planning area and the regional transportation planning area. The comments below highlight two areas that the Transportation Planning Office requests WCOG to consider prior to final adoption, on June 27, 2012.

## Comments

### FTA Alternatives Analysis

#### 23CFR450.322(f) (2)

In addition, the locally preferred alternative selected from an Alternatives Analysis under the FTA's Capital Investment Grant program (49 U.S.C. 5309 and 49 CFR part 611) needs to be adopted as part of the metropolitan transportation plan as a condition for funding under 49 U.S.C. 5309;

Issue: This could affect transit funding within the region and we could not find this in the draft MTP.

*WCOG Staff Response:*

*Transit Alternatives Analysis is required only in the instance of a New Starts situation. This program is not likely to be considered before the next plan update. Therefore, Alternative Analyses are not required of WCOG in the foreseeable future.*

### Project Detail

#### 23CFR450.322 (f) (6)

In all areas (regardless of air quality designation), all proposed improvements shall be described in sufficient detail to develop cost estimates.

Issue: Some, but not all, of the project descriptions appear to be lacking "sufficient detail". This is a possible issue with federal approval of TIP/STIP projects.

## Suggestions

For the next MTP update, consider extending the planning horizon. While 2012-2032 does meet the 20 year requirement, if there is any delay in adopting the plan the planning horizon can fall short. Additionally, we recommend rounding the years in five year increments, e.g., 2035.

*WCOG Staff Response: Noted*

Chapter 2, The Setting: This chapter doesn't flow and is difficult to follow. It isn't clear to the reader what the purpose is, i.e., how it influences the rest of the plan. Consider limiting the data, charts, and graphs in this chapter and focus on presenting a clear description of the methodology, analysis, results, and how this process influenced the MTP goals and strategies and projects. We also suggest moving most of the charts and graphs to an appendix.

*WCOG Staff Response: The Settings chapter has been substantially revised. This chapter, however is intended to paint a picture of the region from a transportation perspective, not to analyze or establish methodologies. Those activities are portrayed in the appendices.*

## WCOG Responses to FHWA Comments on the WCOG 2012-2032 Metropolitan - Regional Transportation Plan

*WCOG Staff Response: For record, the following FHWA comments are based on an early draft of the plan that was submitted early at the request of WSDOT and FHWA. Prior to receipt of these comments, substantial additional information and edits were added to the plan, many of which addressed the comments outlined below, prior to receipt of them. This is true for both WSDOT and FHWA comments.*

## General

The statement “this plan meets Federal and State transportation planning requirements...” needs to be substantiated. The MTP must demonstrate how and where it meets the federal planning requirements. Perhaps the easiest method is to include a table that specifically identifies the provisions of 23 CFR 450.322 and where in the MTP document the requirements are addressed.

An example of where there might be a shortfall: the MTP is required to include both long-range and short-range strategies/actions that lead to the development of an integrated multimodal transportation system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand. The MTP describes current status reasonably well, but there is no analysis shown that demonstrates that future improvements will comply with the regulatory requirement to address future demand. In other words, the MTP does not explicitly show that the project listing will provide a future transportation system that sufficiently meets the needs of the region.

Another example is that the MTP does not sufficiently discuss the types of environmental mitigation activities that may be necessary as a result of a build scenario.

*WCOG Staff Response: The referenced statement is of the WCOG’s belief that the plan does meet requirements. Plans, as well as CFR’s, are subject to interpretation. Short and long range strategies/actions are exemplified in Appendix H. Short range projects are those identified for implementation between 2012 and 2017. Long range projects are those listed for 2017 – 2032. Applicability to plan strategies is identified under “Project Type” and relevance to “State Legislative Transportation Goals.”*

The MTP does not aggregate information sufficiently to describe the issues facing the region that result from the metropolitan area or that affect the metropolitan area.

*WCOG Staff Response: Issues facing the region are spelled out in the Whatcom’s System section.*

The WCOG MPO is advised that the Transportation Improvement Program must be consistent with the newly adopted MTP.

*WCOG Staff Response: Noted*

## Federal Requirements

Under the Section describing Federal planning requirements there are a number of specific items not listed while the last two IMTC and Smart Trips are not federally required.

*WCOG Staff Response: There is no requirement, nor is it additive, to list all pertinent CFR’s. The eight planning factors establish planning fundamentals and provide a baseline for the regulations.*

The WCOG is advised to ensure that statements such as “CFR law also requires MTP/RTPO goals must be coordinated...” are accurate. The CFR does not discuss conflicts between MPO/RTPO goals. Further, the statement that “consistency is a requirement for all transportation plans beginning with the statewide transportation plan...” does not accurately describe the relationship between metropolitan and statewide plans (23 CFR 450.214(f) – within each metropolitan area of the State, the long-range statewide transportation plan shall be developed in cooperation with the affected MPOs).

*WCOG Staff Response: the referenced terminology is extracted from 23 CFR 450.306(d)*

Review of the draft document reflects a passive role that does not permit the MPO to exercise the authority and responsibility intended under 23 CFR 450. The “strategies” included in pages 8 – 13 portray the WCOG as a bystander whose responsibility is to “encourage” other agencies to perform certain activities rather than to conduct those activities. Statements such as “WCOG encourages

maximizing the safety and security of transportation facilities..” need to be substantiated with actions that the WCOG intends to undertake during the plan time frame to make sure that safety and security of the transportation system within the metropolitan area is considered in the decision making. This can be done by establishing measurable objectives for safety/security to be used in selecting projects for programming and implementation.

*WCOG Staff Response: WCOG is not a TMA. WCOG does have authority to sub-allocate STP-R funds, which it does through a competitive process. Safety and security are among the criteria used to score projects proposed under this program. Any other federal funds used for transportation project implementation within the County are not under WCOG control, other than through “encouragement.” As identified in the plan, WCOG also participates in border –related security measures by convening entities with security responsibility and authority and “encouraging” them to apply measures in ways that preserve transportation efficiency.*

Strategy #4 states that “WCOG will work with regional jurisdictions and agencies to provide balanced access to transportation facilities...” How will WCOG do this?

*WCOG Staff Response: This is a question, not a comment, but the answer is: by encouraging them to do so.*

Strategy #8 states that Whatcom is an “affected county.” Describe what this is and how it influences the MPO function.

*WCOG Staff Response: As stated in the respective paragraph “under WA State Commute Reduction Law.”*

Strategy #1 and strategy #13 appear to be the same. Describe the difference or consolidate as one strategy.

*WCOG Staff Response: Education is entirely different from participation. This seems self-evident.*

## The Setting

It would be helpful to make sure that the text discussion identifies the purposes and contents of the information in the tables.

*WCOG Staff Response: Noted*

Tables 1 through 8 are helpful in identifying socioeconomic and demographic indicators, but they are specific to jurisdictions within the WCOG. The information needs to be summarized and described for the metropolitan area.

*WCOG Staff Response: The plan is a combined MPO RTPO, all jurisdictions are considered.*

The VMT and VHT discussion on page 21 appears to be trying to justify future improvements by showing large percentage changes in some jurisdictions. However, on closer inspection the numbers may tell a different story. Changes in VMT and VHT taken by themselves portray a potentially drastic situation (although 89% change in VHT in Blaine might be reasonable considering the 82% increase in employment and 111% increase in population – see below). In order to be meaningful and provide an accurate picture for the metropolitan area, indicators should be normalized so that valid comparisons can be made. Where possible, annual percentage rates should be used and indicators should be shown on a per capita and per employee basis. Using table 1 as an example:

Household population – annual change is 1.2%

Employment – annual change is 1.4%

Daily VMT – annual change is 1.1%

Daily VHT – annual change is 1.7%

The analysis would be made stronger by answering the following questions: How are the “indicators” affecting each other? Are these rates of change reasonable? Are there particular causal relationships that can be determined? Assuming the no-build

scenario for the time frames and given the annual rates of change, what, if any improvements are necessary and why?

Again from table 1:

Daily VMT per capita in 2008 is 20.06

Daily VMT per capita in 2032 is 19.67

Daily VHT per capita in 2008 is 0.54 (32 minutes)

Daily VHT per capita in 2032 is 0.60 (36 minutes)

Daily VHT per employee in 2008 is 0.80 (48 minutes)

Daily VHT per employee in 2032 is 0.87 (52 minutes)

Even though Daily VMT is rising, on a per capita basis it is falling. Daily VHT per capita is increasing but the magnitude of that change is substantially less than what is represented in the table. What do these numbers demonstrate? How does this information influence the transportation system? Again, assuming the no-build scenario for each period, are improvements needed?

In the VMT/VHT discussion on page 21, the City of Blaine is used to demonstrate an extreme situation for the region. Normalizing the indicators (table 2) provides a substantially different picture:

Daily VMT per capita in 2008 is 16.98

Daily VMT per capita in 2032 is 13.57

Daily VHT per capita in 2008 is 0.41 (25 minutes)

Daily VHT per capita in 2032 is 0.37 (22 minutes)

Daily VHT per employee in 2008 is 0.66 (40 minutes)

Daily VHT per employee in 2032 is 0.69 (41 minutes)

*WCOG Staff Response: Noted. This section has been substantially edited in the current draft.*

Please clarify the information that Table 12 is showing – is it for

the no-build? Is it in minutes? Is it per employee?

*WCOG Staff Response: Noted. The adjacent Figure 4 stipulates minutes. The table reflects no-build as stated in the Travel Demand Forecast text associated with all figures and tables except the figures 8, and 9.*

On page 21 there is the statement “because job growth can increase VMT, the region’s VMT is expected to rise by...” Job growth can be one cause of increase in VMT, but there are others, such as where people live in relation to the jobs. The metropolitan plan must identify what is causing VMT growth in the region.

*WCOG Staff Response: Noted.*

Review Figure 6 to make sure that the graph represents “daily” VHT.

*WCOG Staff Response: VHT numbers are extracted from the WCOG TransCAD model. They are correctly labeled “Daily.”*

The “regional lifestyle trends” discussion mentions “unconventional methods of independent travel” but doesn’t talk about what those are.

*WCOG Staff Response: The current draft does not include the quoted language.*

## Whatcom’s System

Walking and bicycling are identified as accounting for substantial percentages of all trips but they are not itemized in tables 1 through 8.

*WCOG Staff Response: Noted*

## Programs & Projects

Where did the “Fiscally Constrained Projects” list come from?

The only demonstration of any “problems” with the transportation system is shown in Figures 7 and 8, which represent the “no-build” scenarios. What is the build scenario? Where is it identified? Was there more than one scenario for the region? If so, how were they compared? What analysis led to the selection of the projects in the list? What demonstrates that the projects in the list will solve the problems identified in Figure 8?

*WCOG Staff Response: V/C is compared graphically in figures 8, and 9, and sourced from model runs.*

Page 42 – how is the SHSP being implemented in the Whatcom MPO?

*WCOG Staff Response: By WSDOT.*

Page 42 – “Pedestrian safety can be increased by addressing pedestrian needs...” “WCOG works with member agencies to examine means for improving the regional safety record.” What is WCOG doing? What projects/programs demonstrate that pedestrian safety is important? Are safety project prioritized in the TIP?

*WCOG Staff Response: WCOG has authority only cooperate with entities having jurisdiction over, and responsibility for, their own road systems. “Working with” is equivalent to “cooperate.”*

Page 43 – “WCOG manages the BC-WA Protocol for Binational Interagency Communication...” What does it mean to “manage the protocol?”

*WCOG Staff Response: Manage, in this instance, means administer, or in other words, track, monitor currency and encourage use of the protocol.*

Page 43 – “WCOG continues to work with partner agencies to ensure proper attention is given to address security needs.” How does WCOG do this?

*WCOG Staff Response: By working with border enforcement entities, primarily CPB.*

## Financial Planning

Page 52 – “Federal funding will continue to play a significant role in the renewal and expansion of highway and transit infrastructure both nationwide and in this region.” 23 CFR 450.322(f)(10)(iv) states, “In developing the financial plan, the MPO shall take into account all projects and strategies proposed for funding under title 23 U.S.C., title 49 U.S.C. Chapter 53 or with other Federal funds; State assistance; local sources; and private participation.” The WCOG MPO is advised to document the financial component of the MTP using Federal, State, Local, and Private revenue sources as identified in the regulation. Federal revenues through titles 23 and 49 are not local jurisdiction revenue sources.

*WCOG Staff Response: Noted, although once allocated to, and obligated by, local jurisdictions, federal dollars do become one component of local transportation funding sources.*

The MTP does not describe how project/program costs were derived. Fiscal constraint cannot be adequately determined unless the methodology used to estimate the costs for all projects is clearly defined.

*WCOG Staff Response: This information has been added to the most current plan draft as Appendix K available at [wcog.org](http://resources.wcog.org/planning/2012WTP_K.pdf) or [http://resources.wcog.org/planning/2012WTP\\_K.pdf](http://resources.wcog.org/planning/2012WTP_K.pdf)*