



King County

Department of Transportation

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January 20, 2009

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Dear Members of the 520 Tolling Implementation Committee:

Thank you for the opportunity to comment on the January 9, 2009 draft report of the 520 Tolling Implementation Committee before you finalize it and transmit it to the state legislature. We commend the committee and staff for your significant efforts in analyzing numerous different tolling scenarios and engaging the public in this discussion. The draft report provides a great deal of useful information in a format that is easy to understand. We believe that the 2009 State Legislature will find this document helpful as it considers the next step in funding the State Route 520 bridge replacement project and makes other tolling decisions.

We feel that it is important that the final document provide all the information the Legislature will need to make decisions leading to a successful tolling program. We are concerned that the draft document does not fully explain the funding required to initiate the Urban Partnership Agreement, or mitigate the impacts to existing transit service during construction of the facility removal of the Montlake Freeway Station. Although the committee made a series of key recommendations on mitigation, we believe that the legislature would benefit from the inclusion of additional recommendations for mitigation in the final report. Our suggested recommendations and explanations are provided below.

A portion of toll revenues should be available to fund transit service in the SR 520 corridor to mitigate the impact of tolling.

Tolling the SR 520 bridge will result in increased demand for transit service from drivers who do not want to pay—or cannot afford to pay—a toll. The draft report concludes that tolling SR 520 will result in a 15-30 percent increase in transit ridership if the bus service is provided. Tolling is also expected to cause diversion of traffic to other routes. Since tolling will cause these impacts, using a portion of tolling revenues to mitigate the impacts is appropriate. The Urban Partnership Agreement (UPA) will fund the purchase of 45 new buses for cross-lake service, but King County Metro Transit lacks the financial capacity to pay the \$3 million annually needed to operate Metro’s share of additional service. Metro has worked closely with the Washington State Department of Transportation and Sound Transit to develop a unified vision and a long-term plan to take advantage of the physical improvements that will be made by the SR 520 bridge replacement project. We believe that this service is essential for the successful operation of the corridor, and numerous comments from the public support this position. The draft report (page 36) recommends using “Urban Partnership Agreement funds to leverage additional transit service.” This is misleading, and implies that existing revenue sources may be available to fund additional transit service. We urge you to clarify in the final report that revenue to operate expanded transit service is not currently available, and to recommend that the legislature consider using a portion of toll revenues for a funding source.

1. Toll revenues should be used to mitigate the impact of eliminating the Montlake Freeway Station.

The draft report notes (page 15) that King County DOT is seeking ongoing funding to replace the function of the Montlake Freeway Station stop that would be eliminated under any of the SR 520 Project West interchange alternatives being considered. The draft report does not, however, make any recommendations to address this issue. Elimination of this freeway station will require an increase in direct service to the University District to accommodate riders that access service via the Montlake Freeway Station Stop. The cost of this additional service is estimated at \$6.75 million annually. If \$3.0 million in annual operating funds are secured for Metro’s UPA transit service, an additional \$3.75 million will still be needed annually to mitigate the loss of the Montlake Freeway Station.

King County believes that it would be appropriate to use a portion of toll revenues to mitigate this impact, and urges you to make this recommendation in the final report. The report might also point out that the elimination of the Montlake Freeway Station will result in lower construction costs for the SR 520 bridge replacement project.

2. Toll revenues used for mitigation of diverted traffic should be available for transit services as well as capital improvements.

The draft report and the traffic diversion mitigation framework memo in the appendix recommend a two-part approach to mitigation that includes 1) keeping traffic on SR 520, and 2) providing mitigation in other corridors that are impacted by diverted traffic. We agree that

tolling can be used to manage the traffic in a way that will make the SR 520 corridor an attractive choice for drivers because of improved speed and reliability. We also support the recommendation that transit service be expanded through the Urban Partnership Agreement and other improvements to transit service in response to anticipated or actual traffic diversion.” A number of local jurisdictions supported this approach as well. However, as stated the recommendation implies that existing resources are available to fund these services, and they are not. We ask that the final report recommend that the Legislature consider using a portion of toll revenues for this purpose.

3. Mitigation Account should be available to fund transit operations and capital costs.

We agree with the recommendation in the draft report that creation of a 520 Tolling Mitigation Account would be useful to respond to actual traffic diversion effects. We believe that funds in this account should also be available to provide mitigation through transit operations or capital improvements, as well as to offset the increased cost of operating existing transit service due to construction activities in the corridor. Metro would like to participate in the “joint state/local process” that will be established to decide how to allocate funds from the Mitigation Account.

4. Joint development of the Coordinated Transit Implementation Plan.

The traffic diversion mitigation framework memo recommend that “WSDOT, King County and Sound Transit develop a coordinated transit implementation plan utilizing the Urban Partnership, Sound Transit 2, and other existing resources to lay out what transit service improvements can be expected for SR 520, I-90 and SR 522 under current programs, and what additional resources might be needed to address 520 tolling mitigation needs.” We understand that this recommendation will be included in the final report, and we agree that a coordinated transit service plan for all three corridors and the funding required to implement this plan will be important for our three agencies to develop.

King County and our partners (WSDOT, Sound Transit and the University of Washington) have already developed a unified vision for the corridor in the SR 520 High Capacity Transit Plan prepared for the State Legislature. This plan identifies needed transit service and the funding shortfall for SR 520 transit services, but the need and the funding shortfall are not clearly articulated in the tolling committee’s draft report. Metro cannot finance an additional \$6.75 million in service for the UPA and the remainder needed to offer alternative transit service to the users of the Montlake Freeway Station. Without the ability to fund the levels of transit service that will be needed when tolling is in place, few alternatives to driving will exist. In addition, the 520 Tolling Implementation Committee’s recommendation to develop a Coordinated Transit Implementation Plan may identify additional transit service and related resource needs for the SR 520, I-90, and SR 522 corridors. For these reasons, we urge you to clearly identify the need for transit funding in the final report, and to recommend that the Legislature consider toll revenues as a funding source.

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Thank you again for your dedicated efforts to understand these issues and for this opportunity to comment on the draft report. We share the goal that the Legislature should have the best information possible to guide them as they make decisions about tolling.

Sincerely,



Harold S. Taniguchi, Director
King County Department of Transportation

cc: King County Councilmembers