

WA State Transportation Carbon Reduction Strategy – Public Comment Responses

As part of developing the WA State Transportation Carbon Reduction Strategy, WSDOT held a public comment period from July 17 through August 16, 2023. During this period, a draft version of the document was made available to the public on WSDOT’s website. All comments received came through an online survey. WSDOT appreciates the public interest in efforts to reduce transportation carbon emissions. This is an important effort and it will take everyone’s contributions to reduce emissions.

The purpose of this first strategy is to create a baseline that documents the policies and strategies currently in place in the state to reduce transportation carbon emissions; although the document outlines next steps, the document does not make recommendations for additional actions. For this reason, comments that recommended new policies or strategies have not been incorporated into the final document. Where feasible, some ideas submitted have been passed along to relevant staff within WSDOT who can consider these ideas as new programs are developed.

The table below organizes comments by topic and generally in the order the content appears in the document. The “Section” column identifies which section of the survey the comment was provided in. Where multiple comments address the same idea, responses are provided to the group of comments.

Topic	Commenter	Section	Comment	Response
Emissions context	Leah Missik, Climate Solutions	CH 1	In sharing out the emissions profile of transportation, it's important to provide additional context. For example, diesel emissions largely come from medium- and heavy-duty vehicles that number fewer on the road but have an outsized GHG impact. It is also shown in the chart on page 17, but I would emphasize that transportation emissions have increased, when they need to go down drastically.	Text added, “Although emissions have gone up and down since 1990, in 2019, the transportation sector’s CO ₂ e emissions were 40.3 MMT, 14 percent above the 1990 level. Emissions have not decreased overtime as needed to begin meeting emission limits.”
Effectiveness of actions	Leah Missik, Climate Solutions	CH 2	The share out of the different actions doesn't really provide scale for readers, either in terms of possible emissions reductions, nor on what timeframe. Having some context is important since not all of these actions have an equal impact, and some are near-term strategies, while some are medium- to long-term.	More information on the effectiveness of existing strategies and gaps is provided in the technical report that will be published in conjunction with the final strategy document.
Role of utilities	Leah Missik, Climate Solutions	What did we miss	I also wanted to flag the role of utilities - some of which are overseen by local governments (for example, Tacoma Power and Seattle City Light) as they are implementing significant	Section added describing role of various entities. This new section includes the following information on utilities, “Utilities providers, particularly electric utilities, play an important role

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			programs, such as curbside EV charging, supporting transit agency electrification, and more.	in vehicle electrification and charging infrastructure. These entities must plan for providing the additional energy needed for vehicles and some are implementing programs such as curbside electric vehicle charging and supporting transit electrification. State decarbonization goals for the electric utility industry are established through the Clean Energy Transformation Act , and work in tandem with the TCRS as part of a comprehensive State Energy Strategy.”
Electric vehicles	Leah Missik, Climate Solutions	CH 2	The list also doesn't include some of the state tax incentives that support vehicle electrification and Sustainable Aviation Fuels, charging infrastructure investments, or the Clean Diesel or VW Settlement grants.	Text added, “Tax incentives to reduce the financial burden of purchasing alternative fuel vehicles and charging and refueling infrastructure are offered by both the federal and the state government. Washington state currently offers incentives on vehicles and on charging infrastructure for households. Additional incentives are available for commercial entities and installations.
	Kelly McGourty, Puget Sound Regional Council (PSRC)	CH 3	Under electric vehicles, it seems wise to include reference here of the significant federal and state investments in this area.	Text added, “To rapidly transition to electric vehicles, the state is advancing a combination of charging infrastructure, public outreach, incentives, grants, taxes, sales restrictions, and fuel regulations statewide.”
Trucks and Ports	Sheri Call, Washington Trucking Associations	CH 2	More input could be given towards Port terminal efficiencies to reduce truck idle time.	The document is capturing existing strategies and efforts. We are not aware of additional programs regarding port terminal truck efficiencies.
	Leah Missik, Climate Solutions	CH 3	I also don't think the NWSA Clean Trucks program call-out on page 37 is the best example, simply because that program should not be replicated today unless the vehicles are zero-emission. We are past the point where more efficient diesel engines for on-road fit within our climate targets.	Removed.
	Sheri Call, Washington Trucking Associations	CH 2	More emphasis should be placed, or authority given to enforcement on trucks whose emission filtering systems have been tampered with. More weight should be given to existing technology with clean diesel engines, 2010 or newer vehicles	Filtering systems reduce PM _{2.5} but do not address GHG emissions. Although important, this work is outside the scope of this document.

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since zero emission will be harder to achieve without infrastructure in place and affordable, available equipment.

<p>Sheri Call, Washington Trucking Associations</p>	<p>Anything else?</p>	<p>The issues traffic congestion and availability of truck parking cannot be ignored in the study of carbon reduction strategies. An average person cannot possibly take the time to read every city strategy, but I would love to see any that have highlighted truck parking as an efficiency measure to reduce truck idle and unnecessary movement of trucks.</p>	<p>Text added, “Per state and federal law, truck drivers must take prescribed safety rest breaks. Currently, in many parts of the state, finding places to park large vehicles during rest periods is difficult, which results in idling and additional miles driven. The state is working to expand truck parking options. The Legislature provided direction and funding for several efforts in the 2023 session:</p> <ul style="list-style-type: none"> • Reconfiguring existing locations to accommodate more vehicles and providing adjacent facilities, such as restrooms • Coordinating with local governments to identify sites and develop recommendations • Pursuing federal grant opportunities to develop and implement parking availability information systems • Planning for additional solutions identified through the above efforts”
<p>Clean fuels standard – biofuels</p>	<p>Peter Heffernan, King County</p>	<p>CH 2 2.3.3 Advance Clean Fuels – Recommend that the report include the Clean Fuels Standard in this section also as well as noted above in accelerate EV. The Clean Fuel Standard has provisions, including requirements for increased biofuel production facilities in WA that will advance clean fuels in WA.</p>	<p>Text added, “As described above, under the Clean Fuel Standard the state assesses fuels to determine lifecycle carbon intensity to ensure compliance with declining carbon intensity requirements. To meet these requirements, in addition to investing in vehicle electrification, fuel suppliers can produce or blend low-carbon biofuels into their fuels. The Clean Fuel Standard also has provisions to encourage in-state production of biofuels.</p> <p>This option is expected to increase the availability of lower carbon fuels in the state at a price competitive with petroleum fuels.</p> <p>Increasing the supply of biofuels available is expected to help reduce emissions from vehicles that are harder to electrify. Biofuels can serve as a bridge fuel until other technology options become more available.”</p>

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User fees	Leah Missik, Climate Solutions	CH 3	Modeling (including from PSRC) shows that user fees has a significant GHG impact. Again, it would be good to try to provide a sense of scale for different interventions based on research that has been done by the state or others.	More information on the effectiveness user fees is provided in the technical report that will be published in conjunction with the final strategy document.
	Kelly McGourty, PSRC	CH 3	The PSRC example under user fees is not quite accurate - our long-range Regional Transportation Plan has included pricing as part of both the financial strategy and the Four-Part Greenhouse Gas Strategy for many years. The 2030 analysis recently conducted was to develop and analyze a 2030 network, and then conduct sensitivity testing of various levers. We are not at the point yet to have developed our Climate Implementation Strategy. Also, I think it's remiss not to mention the detailed work of the Transportation Commission on the RUC in this section.	Reworked PSRC information with input from PSRC.
Mode shift/ network completeness	Kelly McGourty, PSRC	What did we miss	Under mode shift in general, elaborate to reflect interconnected and complete networks are important to achieve results.	Edited content to better reflect importance of complete and interconnected networks.
Land use	Kelly McGourty, PSRC	What did we miss/ CH 3	<p>Under land use, elaborate to include focusing growth in compact communities.</p> <p>Under land use, the examples could be expanded to truly reflect comprehensive planning for future population and employment - the current examples focus more on specific projects and mode shift, and are not as explicit to the underlying fundamental land use planning shift.</p>	Text added, "Planning for future growth must reflect fundamental shifts in land use that are needed to create communities that are truly walkable and bikeable by focusing growth in diverse, compact communities."
Transit service	Kelly McGourty, PSRC	What did we miss/ CH 3	<p>Under transit mode shift, elaborate to support more extensive, connected and all day service not just commuter routes.</p> <p>The transit section could be more expansive in terms of the specific needs and opportunities, elaborating on expansion of networks and service, as well as supportive community shuttles and specialized services where fixed route may not be feasible. The examples are random and diverse and could tie together more for a holistic message on what's needed.</p>	<p>Examples added:</p> <ul style="list-style-type: none"> • "New and expanded service – new routes, more frequent service • Beyond commuter service – transit service outside traditional commuter hours • Incentives that provide equitable access to public transportation services for all • Supportive infrastructure – from rail lines to bus shelters, high occupancy vehicle (HOV), lanes, and business access and transit (BAT) lanes support transit and transit users

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				<ul style="list-style-type: none"> • Community shuttles and specialized services where fixed route transit is not feasible provide access for those who do not drive”
	Bill Barlow, Ben Franklin Transit	Anything else	Statewide free transit fares need to address the practice of using farebox numbers to report boardings to FTA/National Transit Database. Perhaps by assisting Transit Agencies to validate their Automatic Passenger Counters or develop even better automated passenger counting technology (also logs wheelchairs, bikes on bike rack, etc.)	Information has been passed to our public transportation division for their awareness.
	Bill Barlow, Ben Franklin Transit	Appendix A	VMT reduction - P&R could be an independent function - often WSDOT but also Transit Agencies. All need chargers and solar lids, some need rapid chargers for Bus.	Text added, “Over 350 park and ride lots across the state offer travelers designated places to park their cars to take transit or meet a carpool or vanpool. “
Next Steps	Kelly McGourty, PSRC	CH 4	It's a bit unclear if these are intended to be calls to action or suggestions and for whom. It's also unclear what the relationship is, or will be, between this strategy document and implementation of CRP funding by local agencies and MPOs.	<p>These are calls for action. This first TCRS is documenting current state policies and strategies from across the state. While the document does identify some gaps and needs, it is primarily a description of our baseline status.</p> <p>We have added a section at the end of CH 3 to further discuss state investments in projects that reduce emissions. The section includes a list of projects currently programmed in the STIP that use CRP funds.</p>
PSRC references	Kelly McGourty, PSRC	App A	I don't believe the PSRC references are quite accurate - under separate communication I will send revisions to the PSRC citations in Appendix A.	Reworked PSRC information with input from PSRC.
Partners	Breck Lebeque, WA Physicians for Social Responsibility	Anything else	No health or medical organizations were strategic partners. They are critical to measuring & limiting transport emissions WA Physicians for Social Responsibility would like to partner www.wpsr.org/transportation . WA State Medical Association www.wsma.org & WA Public Health Association are essential.	Added WA Physicians for Social Responsibility to our email list for future work and will look for other health-related organizations for future efforts.
Statewide applicability	Dale Robins, RTC	Anything else	Please make the plan more relatable to a statewide audience.	We have tried to use examples and information from around the state. We understand that different communities have different needs and opportunities.

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Resources/ examples to include	Peter Heffernan, King County	What did we miss	In review the report it appears that you are aware of the King County Strategic Climate Action Plan and included information from the plan in the document. https://kingcounty.gov/services/environment/climate/actions-strategies/strategic-climate-action-plan.aspx	Document is included.
	Kelly McGourty, PSRC	CH 3	Under efficient operations, including a more concrete example of ITS - e.g., coordinated signals or TMCs - would be useful to demonstrate the benefits.	Added VAST program (Vancouver area) as an example, “Vancouver Area Smart Trek, the VAST Program, is a coalition of state, regional, and local agencies that have been actively working together for over 10 years implementing ITS and operations solutions to address regional transportation needs. The operational projects include traveler information, transit signal priority, freeway and arterial management, and coordinated incident management.”
	Joe Greenheron, South Whidbey School District	What did we miss	We won a grant from the EPA for a free school bus. Also for a free solar panel system on the elementary school.	Added as an example, “South Whidbey School District received an EPA Clean School Bus grant for an electric school bus and charging station.”
	Leah Missik, Climate Solutions	What did we miss	City of Seattle has been working on a port drayage electrification pilot.	This work is similar to other examples used; did not include.
	Lora Rathbone, Sustainable Tri-Cities	What did we miss	BFCOG is creating the area's first Regional Safe Routes to School Plan.	Text added, “BFCOG is also developing the area’s first Regional Safe Routes to School plan.”
	Lora Rathbone, Sustainable Tri-Cities	What did we miss	Putting in multiple roundabouts at intersections	We were unable to incorporate this example.
	Kim Pearson, SDOT	What did we miss?	https://greenspace.seattle.gov/wp-content/uploads/2018/04/SeaClimateAction_April2018.pdf https://kingcounty.gov/elected/executive/constantine/news/rel ease/2022/October/06-Greenhouse-Gas-Study.aspx	Added Climate Action Plan to resource list.

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Dale Robins, RTC	What did we miss?	Vancouver area has organized the VAST (Vancouver Area Smart Trek) https://www.rtc.wa.gov/programs/vast/ to implement ITS improvements to get the most out of the existing transportation system.	Added VAST program as an example, “Vancouver Area Smart Trek, the VAST Program, is a coalition of state, regional, and local agencies that have been actively working together for over 10 years implementing ITS and operations solutions to address regional transportation needs. The operational projects include traveler information, transit signal priority, freeway and arterial management, and coordinated incident management.”
Rail emissions – PM2.5	Breck Lebeque, WA Physicians for Social Responsibility	<p data-bbox="512 496 625 552">What did we miss?</p> <p data-bbox="667 496 1339 600">https://ww2.arb.ca.gov/our-work/programs/reducing-rail-emissions-california/locomotive-fact-sheets CARB in CA limits diesel PM_{2.5} rail locomotive emissions.</p> <hr/> <p data-bbox="512 636 575 659">CH 3</p> <p data-bbox="667 636 1388 815">Although highway, marine, and aviation sectors were stated, I saw no reference to specific rail decarbonization strategies. CARB (California Air Resources Board) recently required rail locomotives to meet PM_{2.5} emissions standards. WA should too https://ww2.arb.ca.gov/our-work/programs/reducing-rail-emissions-california/locomotive-fact-sheets</p> <hr/> <p data-bbox="512 850 617 906">Anything else</p> <p data-bbox="667 850 1377 971">Regulate Class I and shortline railroads and switching yards, to limit diesel PM_{2.5} particles. Require rapid phase-out of all but Tier 4 locomotives, 50% of loco fleet be electric by 2030, 75% electric by 2035, and 100% by 2040 to meet goals.</p>	<p data-bbox="1419 496 1944 613">PM_{2.5} from diesel engines is a serious health concern. Electrifying locomotives will simultaneously reduce PM_{2.5} emissions and carbon emissions.</p> <p data-bbox="1419 636 1997 873">This document is identifying existing policies and strategies; not making recommendations about additional policies. WSDOT is aware that rail is an important sector within transportation that needs attention for reducing carbon remissions and is a cause of disproportionate health effects. However, this information was not added because it is out of scope of this document.</p>
Rail	Arvia Morris, Climate Rail Alliance	<p data-bbox="512 1006 625 1062">What did we miss?</p> <p data-bbox="667 1006 1388 1458">WSDOT is not focusing on improving passenger rail. They put forward their UHSGT program which if built will not be operational in time to help with reducing VMT or GHG reduction to meet state mandated goals. WSDOT needs to shift focus and double down on improving Amtrak Cascades and bringing back passenger service East West Across the state. For Amtrak Cascades their pre-SDP state of intent does not call out increased frequency of train trips. We need 12-14 trips a day between Portland and Seattle to make a difference. 6 trips is inadequate. We need increased reliability and reduced trip times too, but WSDOT needs ambitious goals for Amtrak Cascades and shoot for excellent service. Some riders have been waiting literally 30yrs for meaningful improvements. We want these improvements in our life time.</p>	<p data-bbox="1419 1006 1892 1062">WSDOT is carrying out the Legislature’s directives on UHSGT planning.</p> <p data-bbox="1419 1084 1934 1263">The purpose of this strategy is to document policies and strategies currently being implemented across the state. Current rail activities are included. This document is not making recommendations about additional strategies that may be needed.</p> <p data-bbox="1419 1286 1997 1399">Added rail section in CH 3, “Rail is typically more energy efficient per passenger or ton-mile of freight, thus switching from roads to rail can reduce emissions. In addition, moving some</p>

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CH 2

The general strategy seems to be to use cleaner fuels, switch to EV and make freight shipments more efficient in some cases with rail. Improving freight shipments with rail is great and electrification of ports is great.

The WA State Transportation Carbon Reduction strategy really falls apart with regard to moving people out of cars and on to other modes. Intercity Passenger rail needs to be central. Biking and walking are great, but we need intercity passenger rail for longer trips.

There is nothing about plans for Amtrak Cascades and how that corridor can be an important part of reducing VMT and GHG reduction. 2.2.4 has nothing about Amtrak Cascades just more studies for UHSGT. We don't need more studies, we need boots on the ground action improving the frequency (12 -14 trips/day between Portland and Seattle) reliability and shorter trip times for Amtrak Cascades. UHSGT is an aspirational idea that should not be emphasized in a document which is meant to address mode shift and reduced VMT to meet our carbon reduction goals for 2030, 2040 and 2050. This program if built will be much too late.

WSDOT needs to be doubling down working with the freight companies to improve our current rail corridor for freight and passenger rail. The two go together. We need to be using public \$ to invest in our current corridor for public benefit of improving our economy and or transit systems to get people out of cars.

WSDOT is in the process of writing a new Service Development plan for Amtrak Cascades, why is this not part of the Carbon Reduction Strategy? What capacity improvements are in that plan? We need to know.

WSDOT does not appear to be committing beyond 6 trips/day between Portland and Seattle. This is just not acceptable.

Anything else?

Please stop trying to push USHGT ahead of Amtrak Cascades improvements in the public view. Amtrak Cascades comes first. Please do all you can to promote this popular service and how it will be improved. New cushy train sets in 2026 is not enough, we need more frequent rides, more reliable rides and shorter trip times. Work with the

transportation from the roads to rail, reduces congestion on the road.”

Added the “grain train” as an example of efforts to increase rail use for freight within the state. “The Washington Grain Train is jointly managed by WSDOT with the ports of Walla Walla and Moses Lake, and with Whitman County. The program has 125 grain cars that the 2,500 members of the cooperative use to move thousands of tons of grain to deep-water ports along the Columbia River and Puget Sound to ships bound for Pacific Rim markets. Operations began in 1994 to address shortages in available rail cars to transport Washington-grown grain.”

Added description of work on new Amtrak Service Plan, “WSDOT has started the process to [update the Amtrak Cascades Service Development Plan](#),¹ including developing service option rider forecasts. Work on the preliminary plan is anticipated by December 2023.”

¹ <https://wsdot.wa.gov/construction-planning/statewide-plans/passenger-rail-plans/amtrak-cascades-service-development-plan>

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		Surface Transportation Board and the freight companies to enforce common carrier obligations for more passenger rail. It can be done. Look at Bright line Florida and Amtrak Chicago to St. Louis. All shared track with freight, passenger rail going 110 mph for parts of the trip.	See response above
Brent McFarlane, TRU	What did we miss?	Climate Rail Alliance https://climaterailalliance.org All Aboard Washington https://www.aawa.us Solutionary Rail https://www.solutionaryrail.org Disability Rights Washington https://www.disabilityrightswa.org Front and Centered https://frontandcentered.org	
	CH 2	<p>The WA State Transportation Carbon Reduction strategy lacks good plan for moving people out of cars and on to other modes of travel, i.e. transit and trains. Intercity Passenger rail needs to be emphasized and incentivized. More safe biking and walking options are healthy, but we need the extended (non-driving) mobility of intercity passenger rail for longer trips.</p> <p>WSDOT has lagged for too long on plans for updating and improving Amtrak Cascades (track and common carrier obligations with freight rail companies). This corridor (with existing right of way) is a critical part of reducing VMT and ambitious GHG reduction goals within the next decade.</p> <p>Re: 2.2.4 This section conspicuously ignores the regional passenger rail system that we have - Amtrak. To begin with - improving the frequency (12 -14 trips/day between Portland and Seattle) reliability and shorter trip times for Amtrak Cascades. This section ignores the potential of restoring dormant east and west and short line routes in WA that could be restored to serve a wider range of communities without rail options available currently. More studies of UHSGT are not going to provide GHG reductions and reduce VMT within the urgent timeline needed to reach our goals and possibly exceed them. We are in a climate emergency now. Ambitious investment in our existing rail infrastructure and a plan for electrification of all routes is achievable if we mode shift our thinking beyond the status quo and act with urgency.</p>	

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UHS GT is an aspirational concept that does not address mode shift and reduced VMT to help meet our carbon reduction goals for 2030, 2040 and 2050. According to the recent RSG report to the WA Joint Transportation Committee it could reach 70 - 150 Billion, require 80 - 90 miles of tunneling and would be much too late. Not 2030, not 2040, ... too late !

See response above

WSDOT has previously stated they are working to a new Service Development plan for Amtrak Cascades, shelving prior work that had been done to expedite planned improvements (Amtrak Cascades Long Range Plan from 2006). The new SDP is absent from the Carbon Reduction Strategy. It should be amended to incorporate the priorities of pain staking work that had been done for the LRP and expedited - built into the strategy with an emphasis on a high ridership scenario. That is to be expected with high population growth projections, crowded overbuilt roadways and climate refugees.

We need the emissions reductions of passenger and freight rail service to be prioritized and implemented between now and 2030 without further delays or the continued distraction of WSDOT promoting the concept of UHS GT.

WSDOT should be working with the freight companies to improve our current rail corridor for freight and passenger rail. Common carrier obligations and positive agreements must be codified and enforced. We need to more public \$ to invested in our current corridor for public benefit of improving our health, our environment and our transit systems.

Anything else?

Work with the Surface Transportation Board and the freight companies to enforce common carrier obligations for more passenger rail. It can be done. It's being done in other states. Put UHS GT on the back burner and focus on regional rail efficiency, reliability and service on our existing corridors. Make it as attractive and effective as a transportation option for many communities and municipalities on the route. Less VMT sooner, cleaner air and less traffic congestion sooner. Time is wasting.

Margie Bone,
350Seattle
member

CH 3

I was surprised and alarmed to see very little mention of development of the Amtrak passenger service, though one of the supporting documents says WSDOT has responsibility (in the case of the Amtrak Cascades line, with Oregon) for

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		supporting Amtrak. Ultra High Speed Rail was discussed, but that has no chance of being helpful in averting climate disaster because it would take way too long to build. We need frequent inner-city rail service in the next few years. Increasing Amtrak service is the only reasonable way to do that.	See response above
William P Meyers, Retired	CH 3	We need high-speed passenger rail between cities, and also to connect us to the rest of the nation. In particular, it should be possible to get on a high-speed train in Seattle and get quickly all the way south to San Diego	
Tim Gould	Executive Summary	Another strategy that deserves more attention is mode shift to rail. As noted in my comments on the "Strategic Actions" section, rail uses one-third or less energy per passenger-mile or per ton-mile as equivalent rubber-tired vehicles on pavement. We should focus on mode shift to rail for both freight and passengers. The state can invest in upgrades to the Amtrak Cascades corridor to improve reliability, frequency, and shorten travel times so as to make better use of the new train sets that the Cascades service will receive in 2026. A minimum objective should be to achieve the high growth ridership scenario described in the 2019 State Rail Plan, which could be done with 2 1/2 hr travel time between Seattle and Portland, and 2 3/4 hr travel time between Seattle and Vancouver BC. These upgrades will require improvements to track, stations, crossings, etc., but fortunately a very detailed plan exists (Long-Range Plan for Amtrak Cascades) for how to do this; it just needs updating for current costs and specific design.	
Tim Gould	CH 3	A key missing action is promotion of mode shift to rail. Basic physics of steel wheels on steel rails for trains mean that rail uses only one-third or less of the energy needed for rubber-tired vehicles on pavement for equivalent passenger-miles or ton-miles of hauling freight. While transition to EVs is an important step, it is not a strategy that will save us on account of more electric energy sources needed to power EVs for all the travel in cars and trucks that occurs now. A reduction of VMT is essential, and an excellent way to achieve this is mode shift of passenger and freight to rail. Then the major rail corridors should be electrified with overhead catenary wire to power electric locomotives without having to resort to technologies with questionable reliability such as hydrogen or	

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		<p>fully battery-powered locomotives (energy density isn't sufficient). WSDOT with backing of the Legislature, should be laser-focused on implementing the high ridership growth scenario in the State Rail Plan along the Amtrak Cascades corridor within the next 8-10 yrs. This will require substantial investment in the existing rail corridor to support 110 mph operation and enough capacity (added track, passing track, etc.) to have hourly service between Seattle and Portland and every-other-hour service between Seattle and Vancouver, BC over the course of a ~14 hr service day. These upgrades to the passenger rail infrastructure will also be of benefit to freight railroads so that more freight can be shifted from trucks to trains. The "ultra" HSR program proposed by the Cascadia Innovation Corridor supporters is NOT a climate solution -- nor mobility equity solution -- in a timeframe that matters for responding to the climate crisis and need to reduce GHG emissions from the transport sector. The "ultra" program is a major distraction that is preventing real solutions from being implemented in a timely manner.</p>	See response above
Brandon Bowersox-Johnson	CH 3	<p>Rail is sorely lacking among the strategies and priorities. Improving passenger rail is a near-term climate solution that can increase mobility and decrease VMT. Rail can also reduce carbon-intensive airplane trips. Amtrak is only mentioned once in the draft document. Please go back to the drawing board and begin planning for improved passenger rail, such as implementing the Growth Scenario in the 2019 Washington State Rail Plan. Rail improvements should be separate from high-speed rail; high speed rail is decades away and is not a climate solution, therefore. HSR cannot be deployed before we have passed climate tipping points. We need to find ways to deliver lower-carbon transportation before 2030. Please support expanded passenger rail, starting with the Amtrak Cascades service, and support electrification of our rail service. Please take a leadership role in making Rail a part of our climate and transportation solutions!</p>	
	Anything else?	<p>Please deploy Passenger Rail improvements (not high speed rail) as a climate solution. See my previous comments on section 3.</p>	

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General	Sheri Call, Washington Trucking Associations	CH 2	We appreciate the comments concerning moving goods more efficiently.	Comments noted. Thank you for taking the time to review the document.
	Ed Sewester. Island County Public Works	Exec Summary	Very good insight to the overall WA State TCRS	
	Peter Clitherow, 46 LD Env Caucus	Exec Summary	The ES states that GHG emissions must be reduced by 35% in the next 7 years. unfortunately, transportation emissions are approx double what they have to be by 2030! of the transportation sector, it's clear that diesel fuel is the biggest increase... your ES doesn't really say anything about how this is to be fixed. Suggest investment in rail freight, which is vastly less carbon intensive for moving freight. that means upgrading freight lines, perhaps even double tracking specific routes to avoid congestion and decrease lead times.	
	Bill Barlow, Ben Franklin Transit	CH 1	I recently e-mailed my progressive network of work associates. The new CR Strategy is brilliantly comprehensive almost to the point of being divisive (competitive). Success can only be achieved by forming an interdisciplinary local focus group to help set priorities for our region. We cannot succeed by grabbing at straws!	
	Ed Sewester. Island County Public Works	Anything else	Aggressive milestones will take an 'all-in' attitude by all.	
	Marco Wanless, Seattle Latino Metropolitan Chamber of Commerce	Anything else	We think this is an important strategy and we would be part of all the efforts to have a clean State.	
	Bill Roach, Horizon House Environment	Anything else	Seems to be fairly comprehensive but the proof is in the pudding! Will it be implemented?	

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	Committee Chair			See response above
	Kelly McGourty, Puget Sound Regional Council	Anything else?	Thank you for the communication throughout the process and for the opportunity to comment.	
	Peter Heffernan, King County	Anything else?	We appreciate the work that has been done to review other agencies plans to identify strategies to include in the document. Look forward to seeing the final document and how this influences funding and implementation actions moving forward.	
Program suggestions	Bill Barlow, Ben Franklin Transit	What did we miss?	Immediate need for e-Vans for Vanpool program. With change in law from 5+ to 3+ we need mini-vans. Would also like to share these vans rather than have them sit immobile for 8-10 hours a day.	This document is identifying existing policies and strategies, we are not making recommendations about additional policies. We have passed your idea on to staff working on vanpools.
	Bill Roach, Horizon House Environment Committee Chair	What did we miss?	Car Sharing as a Fleet Management strategy which allows for reduction of car ownership among individual urban neighborhoods and housing complexes such as Horizon House and provides additional first/last mile strategies	The Zero emissions Access Program (ZAP) provides grants for car share pilot programs in underserved areas. We have passed your comments on to staff working on this program.
		CH 3	You should include electric car sharing as a viable strategy to reduce auto ownership, promote first mile/last mile mobility, provide a bridge for trips not served by public transit, provide a cheaper alternative to Lyft/Uber ridesharing,	
		App A	Include electric car sharing as a decarbonization strategy as it enables lower auto ownership, provides alternatives in the problem of first mile/last mile demand, and a cheaper alternative to Uber/Lyft	
	Marco Wanless, Seattle Latino Metropolitan Chamber of Commerce	What did we miss?	The Seattle Latino Metropolitan Chamber of Commerce has been promoting a proposal for a voucher program, the Washington 300 Zero-emission Incentive Program “WA 300 ZIP”, to facilitate the acquisition of 300 commercial vehicles, including both light and heavy-duty trucks, for small businesses with vouchers covering up to 80% of the cost of the vehicle, with a special focus on assisting organizations	This document is identifying existing policies and strategies, we are not making recommendations about additional policies. We have passed your idea on to staff working on EV grants.

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			lead by people of color, woman and LGBTQ+ which would provide a strong lifeline for their operations and keep Washington clean.	See response above
	Appendix B		The SLMCC has been promoting a proposal for a voucher program, the Washington 300 Zero-emission Incentive Program “WA 300 ZIP”, to facilitate the acquisition of 300 commercial vehicles, including both light and heavy-duty trucks, for small businesses with vouchers covering up to 80% of the cost of the vehicle, with a special focus on assisting organizations lead by people of color, woman and LGBTQ+ which would provide a strong lifeline for their operations and keep Washington clean.	
Opinion expressed	Karen Messmer, Thurston Climate Action Team EV group	What did we miss?	Providing routes for cycling is important, but these should be located away from the heavy traffic of highway intersections and ramps. This means rails to trails routes or other pathways between destinations. 'Do not build more lanes' should always be an option.	Comments noted. Thank you for your interest in reducing transportation carbon emissions. We understand people have many ideas and opinions about how the state should address this issue.
	Margie Bone, 350Seattle member	Anything else	According to the document, you have already received feedback about the sense of urgency, and about the need to increase rail infrastructure and service, both for people and freight. But reading the body of the report, that feedback has not been incorporated.	This document is identifying existing policies and strategies, we are not making recommendations about additional policies.
	Peter Clitherow, 46 LD Env Caucus	Anything else	Lots of blurb saying we must meet this goal and that and how we must do this equitably. but the time has passed for gentle persuasion! need the stick, but this report just has hopes and goals...	
	Anonymous	What did we miss	Implementation of new technologies and establishing access to electric for EV charging, hydrogen system.	
	Ginger Wireman	CH 2	The focus on electric vehicles is maladaptive- too many people cannot afford them. Furthermore- WA is a truck state full of testosterone driven drivers. They need carrots and sticks to give up their ridiculous trucks that never see a dirt road or a heavy load.	

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The state should outlaw lift kits and modifications that decrease already poor mileage. (Plus those trucks are a menace).

WSDOT must stop funding additional lanes, or other projects that make SOV trips convenient and invest as much as possible in public transit, road calming, bike lanes, and safer sidewalks.

See response above

Where HEAL & CCA are concerned no money should be put toward EVs until poor neighborhoods have access to some sort of transit, or safe (ideally separated) bike and pedestrian infrastructure. That includes shaded rest stops and bus shelters! In the Tri-cities Ben Franklin Transit is trying so hard but so few stops gave shelters, and the shelters do not provide shade or much of a wind break! Plus walking to a bus stop could mean blocks in full sun!!

HEAL should force WSDOT to look at real-world impacts of unsafe streets, lack of sidewalks, and lack of shade or shelter.

Bring back Commute Trip reduction for any company employing more than 100 people - do not give waivers for packing houses, county courthouses, etc.

EVERYONE should bear responsibility for reducing emissions!

WSDOT & ECOLOGY could set up an online system to aid employers with multiple locations - from banks to McDonalds - to put the employees at the branch/restaurant/store CLOSEST to their residence!

But mostly, stop funding any road widening. That should be a non-starter.

Tim Gould

Executive
Summary

The scalability of EVs as a GHG emission reduction strategy is not sufficiently examined and reported on in the Exec Smry. While transition to EVs is important, we cannot rely on this as the primary means to decarbonizing transport since the additional electric energy needed to power all vehicle trips will require more clean sources of power than we likely can afford or would want to construct/develop. Reduction of VMT and mode shift to other forms of travel is essential. The difficulty in scaling up EVs should be identified in the summary section.

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Tim Gould	What did we miss	Ambitious focus on transit-oriented development and creating more walkable cities and towns. Changes in land use patterns that reduce demand and distance for travel cannot be emphasized enough.	See response above
Tim Gould	CH 3	User fees are a good way to make prices send the correct signal to people when they select travel modes, destinations, and frequency of trips. While some in the public might grumble, the state needs to move to a system in which auto parking is managed and priced to reflect the true cost of providing that parking. This is especially needed in urban areas where alternatives such as transit and active transportation exist and should be expanded. A priced parking with dividend payout system should be enacted at the MPO level if not more broadly.	
Eric Walters, Snohomish County	What did we miss	In Snohomish County a significant portion of our climate change and carbon reduction policies address minimizing the disruption and avoid adverse impacts on natural and environmentally sensitive areas. As these natural areas help in the sequestration of carbon.	
	CH 2	Same as the previous comment. I think WSDOT should address protecting and mitigating adverse effects to natural and environmentally sensitive areas, especially around areas of planned transportation growth. Expanding and cultivating more natural areas should also be a strategy for carbon reduction.	
Lora Rathbone, Sustainable Tri-Cities	Executive Summary	Use the full amount of the Carbon Reduction Program (part of the BPI - \$6.4 billion over five years to states to plan for and implement projects and strategies to reduce carbon emissions from transportation), for that purpose, NOT to pave roads or other projects that do not reduce carbon emissions. When states update their strategies every 4 years, there should be a way to evaluate effectiveness in future decision making. (What has worked, what has not.)	
Dave Andersen	CH 3	Why don't we stop building new roads? That seems like a really low cost, low risk, reversible and easy to implement strategy that would reduce future traffic and eliminate all the embedded carbon. Yet we still are building new freeways and	

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		adding new lanes to existing roads. We need to stop talking around this issue.	
Nick	Executive Summary	The plan is not ambitious enough. Washington has continued to target VMT reduction goals to no avail while concurrently investing in highway expansion and neglecting regional and local transit. These carbon-intensive projects need to stop NOW and the state needs to plan for a radical change in VMT and CO2, as they have pledged to do since 2008.	See response above
Nick	Anything else?	Please make the plan more ambitious. We need ambitious VMT reduction outcomes, not just greenwashed goals. This will involve highway removal, state-sponsored public transit, a moratorium on highway expansion, low-emission zones, congestion pricing, etc. Washington State has not pledged to do any of these things.	
Lora Rathbone, Sustainable Tri-Cities	CH 2	The State should directly regulate vehicle efficiency and enforce the requirement for vehicles to meet California emissions standards. An incentive to turn in "clunkers" for used EV's or other low emissions vehicles should be available.	
Sandy Bishop, Lopez Community Land Trust	CH 2	2.2 There is so much that could be done differently. For instance, introduce more sail transport along the Salish Sea, Puget Sound, etc. along the water ways to bring local foods and goods to communities along the seas and rivers. Invest in low carbon solutions that create multiple points of community regeneration; including economic, social, cultural benefits. Because our current economic system promotes loneliness, fast paced life styles and over consumption of goods and resources, we will never be able to keep up unless we introduce changes that positively effects multiple points in the system. It may seem far fetched, but humans hunger for meaning and connection. Put our tax dollars to work and reinvigorate local food production, boat building, crafts-personship, social and cross cultural connections and jobs creation.	
Ginger Wireman	What did we miss	None- the Tri-Cities governments (and Benton & Franklin Co) are a complete embarrassment. The counties have tried to defund transit. The cities are bending over backwards to accommodate cars, and improve "LOS". "Complete Streets" dollars were wasted striping major arterials that	

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		people drive 40-55 mph on. We need HOV lanes on Hwy 240 to Hanford, and we need CTR to be reinstated.	
Brian Wilcox	What did we miss?	Infrastructure for bikes. Ban flights under 500 miles. Replace with surface transport. Ban Cars from Urban Cores. Ban non-professional motor vehicle operators. Make driving suck more. Stop letting people repair fossil fuel infrastructure. Rip up parking lots and plant trees. Trains. Buses that connect to overhead wires or third rails. Reducing VMT because autos do 100k times as much damage and repair with concrete also have massive carbon costs. Complete streets for ALL road users. Ban cars.	See response above
	CH 4	There is zero habitable future where non-professional motor vehicle operators are allowed to continue murdering people.	
	Appendix B	Stop being a highway department and fix your shit instead of building more	
	Anything else?	Hydrogen is a boondoggle. Battery powered autos are too. We need to MASSIVELY expand transit that is free at point of service while fucking over air and auto interests. It's so much easier to electrify rail than millions of private autos. I got coal rolled twice today. Do you think those CHUDs are going to electrify!? Ban them from cities and out em on a train and/or trolley bus.	
