



December 12, 2019

Washington State Transportation Commission
PO Box 47308
Olympia, WA 98504-7308

Sent by email: transc@wstc.wa.gov

Chair Litt, Vice Chair Jennings, and the members of the Washington State Transportation Commission:

The City of Seattle appreciates the opportunity to comment on the Washington State Transportation Commission (WSTC) recommendations for a Road Usage Charge (RUC). Seattle has experienced decades of unprecedented economic and population growth, which have brought with them both significant opportunities and challenges – not least of which are the impacts to our transportation system. As our city contends with the ongoing impacts of the period of maximum constraint and the continued need for additional resources to tackle major infrastructure needs, we have a keen interest in the development and implementation of the RUC.

We encourage you to create a progressive and equitable RUC program that invests in much-needed multimodal transit projects. Our specific and detailed comments are as follows:

Allow revenue to be spent on transit investments

A robust public transportation system is key to preserving mobility, advancing transportation equity, and reducing the environmental impacts and greenhouse gas emissions of our transportation system. The RUC presents a tremendous opportunity to move past the transportation funding structure of the gas tax and invest in the critical multimodal transit infrastructure that keeps people and goods moving in our region.

While maintenance and preservation of roads and bridges is an appropriate use for RUC revenue, we believe there is a strong reason to dedicate some of the proceeds towards investments in multimodal investments that improve safety and mobility for all users and reduce climate impacts of transportation. Restricting RUC revenue to highway purposes only would limit the efficacy of the program to address the challenges of mobility in the modern era.

Establish a rate structure that centers equity and mobility

The gas tax, historically the predominant source of funding for transportation infrastructure in Washington, is no longer a long-term solution. The flat, per-gallon excise tax also has a disproportionate impact on low-income individuals. It does not have the ability to take into account when and where a user is driving, and how that affects the transportation system overall. If designed with equity as a core objective, the RUC could directly address increasing traffic congestion while helping to address our outdated transportation funding model.

The RUC should include congestion factors in its pricing model, such as charging more to use roadways during peak commute periods. It should also have a progressive structure, either built directly into the per mile rate or through a reduced fee income-qualifying program similar to King County Metro's ORCA LIFT reduce bus fare program. Finally, we recommend that the WSTC monitor the impacts of the RUC on

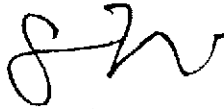
marginalized and underserved communities and commit to making adjustments to support fair and equitable implementation.

Embrace continued local innovation

Municipalities throughout Washington State have unique local needs and circumstances that should not be overlooked as the RUC is developed. Local governments must retain flexibility and be empowered to innovate. The implementation of a statewide RUC should not preempt local governments' ability to develop and implement other approaches to managing and pricing congestion. Further, anonymized data collected through the program should be made available to local and regional governments for analytical purposes so that they can make more informed traffic and safety engineering decisions.

A RUC has the potential to fundamentally change the way that Washington State funds and manages its transportation system. We strongly urge the WSTC to seize this opportunity to establish a 21st century framework that embraces multimodal mobility, local problem-solving, and environmental justice.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Zimbabwe', written in a cursive style.

Sam Zimbabwe
Director