



**Washington State
Department of Transportation**

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May 30, 2023

Ms. Heather Wright
City of Poulsbo
Planning and Economic Development
200 NE Moe Street
Poulsbo, WA 98370

Dear Ms. Wright:

The Washington State Department of Transportation (WSDOT) appreciates the opportunity to review and comment on the “Determination of Significance and Request for Comments on Scope of Environmental Impact Statement (EIS)” for the City of Poulsbo’s 2024 Comprehensive Plan Update. Alignment between local, regional, and state planning efforts is vital to advance shared interests in the comprehensive planning process.

WSDOT offers the following input in support of the City’s efforts.

Land Use Alternatives

WSDOT supports policies and plans that accommodate projected growth consistent with principles of compact, urban, transportation efficient development. WSDOT encourages the city to explore a range of land use alternatives that include elements to manage vehicle demand and minimize the need for costly roadway capacity expansion.

Transportation Alternatives

WSDOT encourages that transportation alternatives for the Comprehensive Plan Update begin from a foundational perspective of reducing vehicle travel demand and the need for additional capital investments through transportation-efficient land use strategies and related demand management policies. When considering options for addressing level of service deficiencies, WSDOT encourages consideration of a tiered approach, as follows:

- Begin with application of transportation system management and operations strategies to maximize efficient use of current facilities.
- Consider targeted capital investments on the local transportation system to improve network connectivity for all users.

- Address remaining deficiencies with targeted capital investments on the state highway system, with a financing plan that recognizes contributors to the underlying level of service deficiencies.

EIS Analysis Scope

WSDOT requests that the Transportation Element and EIS provide thorough analysis and documentation of the “estimated traffic impacts to state-owned transportation facilities resulting from land use assumptions” (RCW 36.70a.070(6)(a)(ii)). WSDOT has a particular interest in the following Transportation Element requirements:

- Level of service standards for all locally owned arterials and transit.
- Level of service standards for state highways to gauge system performance.
- Specific actions and requirements for bringing into compliance locally owned transportation facilities or services that are below an established level of service standard.
- Forecasts of traffic for at least ten years based on the adopted land use plan to provide information on the location, timing, and capacity needs of future growth.
- Identification of state and local system needs to meet current and future demands.

State-owned facilities identified in the Plan need to be consistent with the statewide multimodal transportation plans as required under Chapter 47.06 RCW. These statewide plans include, but are not limited to, the WSDOT Highway System Plan, WSDOT Active Transportation Plan, Washington State Strategic Highway Safety Plan, and public transportation, freight, and rail plans.

Other Relevant WSDOT Priorities

WSDOT encourages consideration of the following statewide Legislative priorities during development of the Comprehensive Plan Update and the EIS:

- [HB 1220](#): WSDOT supports the intent of HB 1220 to explicitly address the housing and transportation needs of low, very low, and extremely low-income households. WSDOT encourages the City to identify transportation policies and investments that will address transportation challenges faced by these lower income households wherever they are located in the planning area.
- [Complete Streets](#): In 2022, the Washington State Legislature passed [Senate Bill 5974](#), the Move Ahead Washington package. It directs WSDOT to incorporate the principles of Complete Streets in most state transportation projects. While the statutory requirement is specific to WSDOT, we encourage our local partners to consider Complete Streets principles as a tool for managing vehicle travel demand and a potential level of service standard. More information on this new requirement, including staff contacts, can be found on WSDOT’s [Complete Streets](#) webpage.
- [Vehicle Miles Traveled \(VMT\)](#): RCW 47.01.440 establishes statewide targets for reducing VMT per capita, and WSDOT is currently responding to a [legislative proviso](#)

to help advance these goals. Local decisions and the partnership between local jurisdictions and state agencies are critical ingredients. Together we can reduce VMT per capita and help advance this work through your plan updates.

- HB 1181: This new law adds climate change and resiliency goals to the Growth Management Act (GMA) along with commensurate mandatory elements for Comprehensive Plan updates. Importantly, HB 1181 provides an explicit requirement for addressing the VMT reduction targets of RCW 47.01.440 within the Comprehensive Plan update. HB 1181 further expands mandatory elements of Transportation Element to include multimodal travel demand, multimodal level of service, and transportation system safety. WSDOT is reviewing these recent statutory changes and will provide further guidance on our implementation and review procedures. We request that the Comprehensive Plan update and EIS fully address the HB 1181 requirements and intent.
- SSSB 5412: This new law provides a SEPA categorical exemption for most residential development subject to several important requirements. Those requirements include demonstrating that the proposed project is consistent with the Comprehensive Plan and development regulations and preparing an environmental analysis that “analyzes multimodal transportation impacts, including impacts to neighboring jurisdictions, transit facilities, and the state transportation system.” SSSB 5412 allows a Comprehensive Plan or similar system-level plan to provide this environmental analysis, subject to requirements that WSDOT be consulted “on impacts to state-owned transportation facilities including consideration of whether mitigation is necessary for impacts to transportation facilities.” WSDOT is preparing guidance for determining that a Comprehensive Plan update and EIS are sufficient for the purposes of this Categorical Exemptions. WSDOT requests that the EIS scoping anticipates an expansive multimodal transportation analysis to allow for potential project-level Categorical Exemptions.

WSDOT Resources

WSDOT offers resources to assist local land use and transportation planners. These include, for example, guidance on state project information to include in your travel demand model updates, transportation funding sources, and crash data. Local agencies can also find links to GMA training opportunities, best practices in building transportation efficient communities, and pertinent concurrency and SEPA guidance. A complete list of resources can be accessed at: <https://wsdot.wa.gov/engineering-standards/planning-guidance/land-use-transportation-planning>.

WSDOT’s [Community Planning Portal](#) may be particularly helpful for local jurisdictions. The portal includes data on the state transportation system often needed to complete the transportation element inventory required by the Growth Management Act. In addition to the

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data included in the portal, local planners can add their own data to ArcGIS Online and create custom reports.

Engagement & Coordination

WSDOT recognizes alignment between local, regional, and state planning efforts is vital to advance shared interests in the performance of a safe, efficient multimodal transportation system. Please reach out if you would like to discuss opportunities for ongoing engagement and coordination, as well as technical assistance available during your plan updates.

We also ask that all planning related documents (i.e., scoping documents, draft plans, annual amendments, EIS documents, etc.) be submitted to orplanview@wsdot.wa.gov. In addition, please add this address to your agency distribution list for all future planning work.

Thank you again for the opportunity engage in the planning process in review of the EIS scope for the 2024 Comprehensive Plan Update. We look forward to continuing our productive partnership.

Sincerely,



George Mazur, P.E.
Multimodal Planning Manager

GM:yl

cc: Catherine McCoy, Washington State Department of Commerce
Paul Ingram, PSRC