

# MOVE SKAGIT



## Move Skagit 2050 Appendix G: Public Comment Tracker



Skagit Council of Governments Regional Transportation Plan - Public Comments Received

ID	Date	Last Name	First Name	Source	Organization	Email	Page #	Comment (Verbatim)	Response
1	1/20/2026*	Bray	Debra	<a href="#">Email</a>	Swinomish Indian Tribal Community	<a href="mailto:dbray@swinomish.nsn.us">dbray@swinomish.nsn.us</a>	56	I have read Skagit's Draft Regional Transportation Plan and you guys did a great job. It is friendly, easy to follow, and the pictures are "real" even Grants smile. We would recommend one change please. Page 56... (commentor provided an image to identify a project that was being commented on for project 68 on page 56) Project: The project is to improve access and safety along SR 20 and at Casino Drive and Long John Drive. The project includes bringing acceleration and deceleration lanes along SR 20 up to current WSDOT standards, providing multimodal facilities for pedestrians and bicyclists adjacent to SR 20, and upgrading the ramp terminal intersections to roundabout control.	Thank you for your comment. Project description for project 68 revised in Table 6.
2	1/14/2026*	Lane	Peter	<a href="#">Email</a>	City of Sedro-Woolley	<a href="mailto:plane@sedro-woolley.gov">plane@sedro-woolley.gov</a>	General	Looks good. Few comments on project dates: The SR 20 /Cascade Trail West Extension, Phase 2A should be put at 2028 completion year. This aligns with our CN appeal and also the remaining work we have to do for RW. The SR 20 /Cascade Trail West Extension, Phase 2B should be put at 2030 completion year. This aligns with planned CN year. Cascade Trail East Extension. This is currently at 2028, but we have no active planning or design on this one. Push to 2030 or later.	Project completion dates updated in tables 4 and 5. Updated dates included in project figures.
3	1/30/2026	Stiles	Michelle	<a href="#">Email</a>	WA Department of Natural Resources	<a href="mailto:Michelle.Stiles@dnr.wa.gov">Michelle.Stiles@dnr.wa.gov</a>	General	Washington State Department of Natural Resources, Northwest Region, Comment regarding Move Skagit 2050 Draft Regional Transportation Plan: Thank you for the opportunity to provide public input on the Move Skagit 2050 Draft Regional Transportation Plan. We appreciate the effort to plan for transportation needs that support mobility, safety, and resilience throughout Skagit County. We are writing to express support for the southern portion of Peter Burns Road as a designated county road under Skagit County's jurisdiction. This section of Peter Burns Road serves as a crucial access route for recreationalists, property owners, and emergency services. Its county road status is important for the community's connectivity and safety. Thank you for considering this input. We encourage Skagit Council of Governments and planning partners to support local transportation networks in ways that preserve essential connections for residents and maintain local jurisdictional alignment where it best serves public needs.	Thank you for your comment.
4	2/3/2026	Sturges	Susan	<a href="#">Email</a>	U.S. Environmental Protection Agency	<a href="mailto:Sturges.Susan@epa.gov">Sturges.Susan@epa.gov</a>	General	Thank you for meeting with Region 10 NEPA and Air Planning staff on 11/24/25 to discuss the Draft Move Skagit 2050 Regional Transportation Plan and following up on 1/23/26 with the draft RTP comment period. We appreciate the review opportunity and do not have comments on the draft RTP at this time.	Thank you for your review.
5	2/4/2026	Moran	Bridget	<a href="#">Email</a>	Skagit River System Cooperative	<a href="mailto:bmoran@skagitcoop.org">bmoran@skagitcoop.org</a>	General	Thank you for the opportunity to connect via phone yesterday and entertaining my silly question. I have a much better understanding of the scope of the plan and what constitutes a "regionally significant" project! On behalf of the Skagit River System Cooperative (SRSC), I have reviewed the Draft 'Move Skagit' 2050 Regional Transportation Plan (RTP) and provide the following brief comments in coordination with the public comment period open through February 6, 2025. As someone who is clearly new to reviewing Regional Transportation Plans, I would like to gain a better understanding of how the 'regional transportation system' (map on page 45 of the draft RTP) is delineated. Does SCOG determine which roadways and trails are part of the system? Or do they receive this guidance from the state? I'm curious because there are some roadways not included in the system that serve as critical alternate routes when parts of the established system fail. I think of coastal flooding at SR20 south of March's Point, for example. When SR20 floods, traffic is redirected via Satterlee Road, which is not technically part of the system but certainly an essential alternate route. I do wonder if there's an opportunity to include alternate routes in future RTPs and whether that might benefit some of the transportation projects planned for these routes. One notable difference between the 2045 RTP and the 2050 RTP is that the 2045 RTP details the ways in which the plan intersects with the Skagit Chinook Recovery Plan and Puget Sound Steelhead Recovery Plan. These recovery plans are briefly mentioned in the 2050 RTP, though not as detailed. I recommend the more detailed language from the 2045 RTP be reintegrated into Section 2 of the 2050 RTP to ensure recovery goals and recommended recovery strategies remain 'top of mind' when planning transportation projects that may impact fish habitat. Mark, we spoke about updated numbers for injunction barriers (Appendix D), and I understand you recently received updated data from WSDOT. For what it's worth, I consulted with our technical staff who closely track the injunction list and obtained the following: "There are 901 barrier culverts remaining on the injunction list. 591 of these remaining culverts will result in significant habitat gain." I believe these were pulled from the same spreadsheet that WSDOT uses, so they should hopefully align with your numbers.	Thank you for your comments. The regional transportation system is determined by SCOG in coordination with regional partners, and includes proposed transportation improvements and regionally significant transportation projects and programs that are described in Section 7 of the Final RTP. Revised text was included in Section 2 (Related Planning Efforts) to include descriptions of the Skagit Chinook and Puget Sound Steelhead recovery plans and recovery goals and strategies from the 2045 RTP. Thank you for providing updated estimates. For consistency purposes, estimates on the number of injunction barriers are based on the most recent data from WSDOT.
6	2/5/2026	Pahs	Matthew	<a href="#">Email</a>	FHWA	<a href="mailto:matthew.pahs@dot.gov">matthew.pahs@dot.gov</a>	General	Table provided in Attachment A.	Thank you for your comments. Additional compliance information has been included in Appendix A: Compliance Checklist and revised headers in Section 8 to be consistent with compliance language regarding "systemwide estimates."

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7	2/6/2026	Shambaugh	John	<a href="#">Email</a>	WSDOT	<a href="mailto:john.shambaugh@wsdot.wa.gov">john.shambaugh@wsdot.wa.gov</a>	17	<p>We have reviewed the Skagit Regional Transportation Plan update. The plan looks great we only have a few comments and questions which are listed below. It is nice to see the integration of the 2025 Washington Transportation Plan, and supporting Skagit Safety Action Plan, Transportation Resiliency Improvement Plan and local jurisdiction GMA planning. The integration of these plans will ensure that state and regional transportation priorities continue to remain in alignment to meet the needs of the public.</p> <p>Issues and concerns raised by Justin. Some of these issues were also discussed at our Joint monthly meeting on February 4:</p> <ul style="list-style-type: none"> <li>- Nice to see Safer LU called out in the plan</li> <li>- Work trips as only 9% of total trips is notable – is that new since covid or consistent over time?</li> <li>- Does Fall 2021 feel appropriate for capturing post-pandemic shifts?</li> <li>- How was the balance of online and in-person engagement?</li> <li>- SCOG's Transportation Resilience goal could align with WTP 2050 Stewardship goal.</li> <li>- Are the ped/bike LOS standards for urban vs rural really all that different? The rural shoulder standard still strikes me as a system completeness standard.</li> <li>- I like the transit LOS measure looks appropriate. Is there a potential equity component here?</li> <li>- May want to expand on the Ferry LOS: I don't recall Level 1 calling out pricing strategies. I believe Level 2 includes capital investment as well.</li> <li>- Recommend removing WSF from Table 6 callouts.</li> </ul>	<p>Thank you for your comments. Regarding the percentage of work trips, 9% was also the total in the 2008 travel survey. Additional information has been added to the "Regional Travel Patterns" section to indicate why 2021 data is presented. Chapter 3 of the plan cover engagement activities, which included a balance of in-person and online engagement. A note has been added above Table 3 indicating that transportation resiliency is included in the WTP 2050 Stewardship goal. SCOG looks forward to continuing discussions with WSDOT on revisions to current MMLOS standards. Ferry LOS standards have been updated to reflect the current WSF 2040 Long Range Plan. WSF callouts in Table 6 were an error and have been corrected.</p>
8	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	General	<p>We have preliminarily reviewed the Draft Regional Transportation Plan (Move Skagit). Our comments and suggested changes are included as mark-ups in the attached document. After reviewing this document, I feel very strongly that the consultant team owes us some significant revisions.</p> <p>Of most concern, the document includes many examples of unclear language, contradictory statements, and terminology or words that are not commonly used or broadly understood. It's important that this document be as accessible to the public and our regional policymakers as possible. It's also concerning that the plan doesn't appear to include MMLOS standards or significant steps to address VMT and GHG reduction goals.</p> <p>Also, I would strongly encourage SCOG staff to directly ask the consultant team if AI was used to draft any portion of this document. If so, the consultant team should clearly disclose the extent to which AI was used in preparing the document.</p>	<p>Thank you for your comments. Plan revisions have been incorporated throughout the Final RTP to address your comments, specifically additional revisions have been included to address compliance related to VMT and GHG reduction.</p>
9	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	6	<p>This section could be improved for readability and clarity. Suggest using bullet points with short sentences enumerating the purposes of the plan. (1) establishing regional goals and policies, (2) consistency with state and local plans, (3) Used to identify and prioritize regional investments.</p> <p>The introduction, more than any other section of the document should be clear and understandable by a broad audience.</p>	<p>Comment noted.</p>
10	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	9	<p>Also, the plan needs to be guided by the appropriate sections of the CPPs.</p>	<p>The plan incorporates relevant sections of the CPPs (e.g., climate and transportation policies in Section 4). Additional references added to Federal and State Transportation Planning Requirements section, "Summary of Compliance Requirements" callout box, and Appendix A: Compliance Checklist.</p>
11	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	9	<p>Suggest leading with a brief statement outlining in plain language that the Regional Transportation Plan needs to address federal, state, and local requirements. Launching into a recital of US code and CFR citations will lose many readers without getting the essential point across.</p> <p>Also, this section would benefit from reorganization. Start with a paragraph explaining the basic concept: there are (a) federal, (b) state, and (c) local requirements which must all be addressed by the regional plan. Then provide a paragraph for each of the three groups of requirements, and conclude with a paragraph on coordination.</p>	<p>Comment noted.</p>
12	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	9	<p>This legislation, and its implementation at the local level did much more than "reinforce the need to address climate change". To be very clear, we are obligated to adopted policies and regulations that will achieve a reduction in GHG emissions and per-capita VMT. This needs to be stated clearly and directly here.</p> <p>At the local level Countywide Planning Policy Goal 14 specifies that regional transportation plans adopted under Chapter 47.80 RCW comply with climate mitigation and GHG reduction requirements.</p>	<p>Added text to reference CPP Goal 14 and noted that local governments are required to set targets for VMT and GHG reduction.</p>
13	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	10	<p>Include MULTIMODAL level of service standards</p>	<p>This list of requirements is restating the RTP requirements per RCW 47.80.030, which does not specifically reference MMLOS. MMLOS standards and considerations are incorporated into other sections of the RTP.</p>
14	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	10	<p>Also required to include policies to address the GHG and VMT reduction goals of RCW 47.01.040 and 70A.45.020 (see CPP 14.1, 14.2, and 14.3).</p>	<p>This list of requirements is restating the RTP requirements per RCW 47.80.030. Policies addressing GHG and VMT reduction are included in Section 4 of the Final RTP and the referenced RCWs are addressed in compliance sections, as noted in response to comment 14.</p>
15	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	11	<p>RCW 47.01.440 (VMT Reduction) &amp; RCW 70A.45.020 (GHG Reduction)</p>	<p>Added references to Summary of Compliance Requirements callout box and Appendix A: Compliance Checklist.</p>
16	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	11	<p>Suggest including a regional/local heading as follows: Regional: Consistency with Skagit County Countywide Planning Policies.</p>	<p>Added reference to CCPs in the Summary of Compliance Requirements callout box. CCP consistency is addressed under RCW 48.80.023.</p>
17	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	12	<p>It would be helpful for readers if this section explained how this actually looks locally. For example: Transportation/GMA policy boards comprised of regional elected officials and Transportation/GMA Technical boards comprised of subject matter experts, and the role of SCOG staff.</p>	<p>Comment noted. The role of SCOG boards and committees is included within the Regional Transportation Planning section in the Introduction.</p>
18	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	12	<p>This section would benefit from editing for clarity and organization. A flow-chart style graphic would also help explain the relationship between state, regional, and local plans.</p> <p>The introductory paragraph should explain the basic relationship, subsequent paragraphs should provide more detail on each element (state, regional, and local), and a concluding paragraph should explain how this plan will ensure coordination on an ongoing basis (Regional TIP Update).</p>	<p>Comment noted.</p>

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19	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	12	More relevant to our local planning context is the need for all plans to be based on, and cite, the population, employment, an housing forecasts adopted in the CPPs. Referencing OFM is misleading since the CPP forecasts must fall withing OFM range, but all subsequent planning decisions must be consistent with regionally adopted forecasts.	Comment noted. Revised text to note that population and employment forecasts are regional. There are differences in the population and employment forecasts included in the RTP compared to the CPPs because the RTP planning horizon is through 2050. Additionally, the regional travel demand model does not include Guemes Island and Lake Cavanaugh, which results in different forecasts compared to the CPPs, which cover all of Skagit County.
20	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	15	Also important, but not listed here are the state's climate change and VMT reduction laws (RCW 47.01.440 and 70A.45.020). These laws need to be listed here. CPPs should also be identified.	Additional information added to the Summary of Compliance Requirements callout box.
21	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	15	This entire section should be revised in a way the connects growth statistics to their application, in this case a regional transportation plan. The way the data is presented here is unhelpful.	Introductory sentence added to state why the RTP considers historical population growth and cite historical estimates from OFM.
22	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	15	It would be more helpful to provide an annual growth rate figure. Citing a percentage change across a long time period is misleading since readers cannot easily determine whether the percentage change is large or small, or easily compare it to other growth figures. This is not a helpful way to present data.	Comment noted.
23	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	15	This statement directly conflicts with the statement in the paragraph below.	Comment noted.
24	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	15	This should be revised. What's actually remarkable is that the largest city in the region grew by such a small relative amount than Burlington, La Conner, Anacortes, and Sedro Wolley. This outcome is not what would normally be expected. Normally the largest city in a region should be expected to grow the fastest.	Comment noted,
25	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	15	Since no data table was provided to verify growth figures over the 2010 -2025 time period it's impossible to verify this assertion; however, it directly contradicts the statement in the paragraph above regarding relative growth rates. This entire section should be reviewed and revised. Also, growth figures should be presented in a table for clarity. In addition, citations for the source of growth figures should be provided. For purposes of consistency across planning documents, SCOG GMA Monitoring Program figures should be used.	Citation added. Historical estimates were obtained from OFM.
26	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	15	What "movement"? What the data shows is (a) that most growth is occurring in UGAs, (b) the urban growth areas closest to I-5 area growing the fastest, (c) small up-river communities are either declining or growing by very little.	Revised to UGA where appropriate.
27	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	15	What is an "urban center"? Please revise to use the term "Urban Growth Area" which is a legally defined term with fixed and readily identifiable geographic boundaries. Urban center does not have a clear definition and there is no way for readers to easily understand what areas.	Revised to UGA where appropriate.
28	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	16	Where did these "projections" come from? What is the source? A citation is needed.	Skagit County of Governments, 2025
29	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	16	This appears to be a mistake. Is this the total number of housing units in the year 2050 (new + existing) or the expected "growth" (just new)? The official growth allocations included in Appendix A of the CPPs call for a total county-wide housing growth of 17,450 units over the 2022 - 2045 time period. Something is wrong.	Projections confirmed and citation added. See response to comment 19 regarding differences in RTP and CPP projections.
30	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	16	Since these figures are listed under a heading entitled "growth projections" they should list the expected growth, not the expected outcome. This is confusing.	Comment noted.
31	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	16	"focused"?	Revised.
32	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	16	Again, what is an urban center? Please use UGA.	Revised to UGA throughout the plan.
33	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	16	And relevant to this document, it can be expected to create a strong demand for transit and non-motorized transportation options.	Revised to acknowledge potential to increase demand for transit and non-motorized travel.
34	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	16	More people and more employment means more trips regardless of where the people and employment are located. More people and more employment concentrated in a small geographic area means shorter trips and perhaps a shift in mode share.	Comment noted.
35	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	16	Which forecast? where? please provide citation.	Traffic volume forecasts are described in Section 7 (Travel Demand Forecast Scenarios). Added reference in text to Section 7.
36	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	16	To complete this thought it would be fair to state that. congestion and increasing travel times may result in an increasing concentration of development in existing developed areas, changes in travel behavior, shorter trip lengths, and shifts in mode share. This is not a trivial matter. The way this statement is framed ignores induced demand and land use effects.	Thank you for your comment. Land use effects are discussed in the following paragraph and addressed throughout the plan. The last paragraph was revised to note that induced demand is a consideration for capacity expansion when necessary.
37	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	16	The heading of this section is "growth projections", yet this paragraph seems to jump ahead to the solutions. Suggest either striking section, or replacing it with a paragraph outlining the region's goals for reducing per-capita VMT, GHG emissions, and shifting travel demand to non-vehicular modes.	Comment noted. Reference added to Section 4 goals and policies to tie anticipated growth to regional goals.
38	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	16	As opposed to expanding roads where unnecessary?	Comment noted. Please see response to comment 36 for revisions.
39	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	17	Returning home from where? What does this include? Is it the return trip associated with all other trip types? If so, this is misleading and unhelpful.	Comment noted. Please see response to comment 41 for revisions.
40	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	17	What is an "escort trip"? Suggest using common terminology or providing explanations.	Comment noted. Please see response to comment 41 for revisions.
41	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	17	Numerically what do they represent collectively? This data is highly relevant to the region's transportation and land use plans. Nationally, non-work travel is the largest and fastest growing travel category.	Comment noted. Revised bullets under "Trip Purpose and Distance" subheading to revise descriptions of work and non-work trips.
42	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	18	Maybe rather than saying "automobiles dominate travel", just present the facts. One fact is that if 87 percent of trips are car trips, 13 percent involve some other mode.	Comment noted.

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43	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	18	Why would "telework" (remote work?) have increased so dramatically in 2021? If there's an obvious reason it would be appropriate to identify it here. (COVID).	Comment noted. Added sentence in reference to COVID 19 pandemic.
44	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	18	Yes, and with respect to Skagit County specifically, how does the county's employment composition suggest this might impact Skagit County? For example, are industries where remote work is common over, or under, represented in Skagit County? If such industries are significantly under represented in Skagit County, then an increase in tele (remote) can be expected to have little impact on overall travel. The opposite is also true. In addition, this section should highlight the fact that remote works only travel demand related to work. Other trips types are not effected. As this documents shows, the combined effect of other trips types is greater than work travel. Rather than saying it impossible to know, it is appropriate to outline the most likely impacts of remote work based on what we know about regional travel demand and employment characteristics	Comment noted. Revised text to include discussion of telework and employment shares by sector. Added citation for employment data.
45	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	18	Please consider striking this entire section. It is inappropriate to present data points across such a narrow time period, particularly when the time period in question corresponds with a unique global event.	Comment noted. This section is related to the regional travel survey, which was last conducted in 2021. A note regarding the timing relative to the COVID-19 pandemic was added.
46	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	27	What does this mean? What does it NOT mean? Policies included in the document should create a usable framework for decision making. What sort of decision would not be consistent with this policy?	Agree the policy was vague as written and it has been removed.
47	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	29	Goal 3 does not appear to be specific to transit, yet the only performance measures listed here are related to transit. Is something missing?	Goal 3 is related to Stewardship, which is not just transit specific; however, the federally required performance measures related to Stewardship are those focused on the transit system.
48	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	29	What does this mean? What sort of strategies might be employed to "recognize densification of urban areas"? What, specifically, is "transitioning" in the context of this policy? Suggest striking this policy and replacing it with a policy that describes a specific course of action.	Policy 3.3 revised.
49	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	30	Shouldn't the MMLOS standards BE in this document? If such standards haven't been developed already, when will they be developed?	Comment noted. The RTP includes a framework for MMLOS standards. WSDOT and local jurisdictions are required to develop MMLOS standards. This policy is intended to acknowledge that work is still in process and should be included in future RTP updates. As part of the RTP scoping, additional grant funding was sought to complete additional MMLOS analysis. Unfortunately, those grants were not successful and therefore, the RTP scope did not include a detailed MMLOS analysis.
50	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	30	Suggest adding an additional metric "Population-weighted percentage of jobs within 1/4 mile of housing"	Added metric to bullet list in policy 3.11.
51	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	30	Suggest adding : "estimated GHG emissions associated with regional travel".	Comment noted. This data doesn't exist and would require additional modeling. VMT per capita is included because it is a useful proxy for emissions.
52	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	31	Per-capita VMT is arguably the single best measure of transportation system efficiency. If people are able to meet their needs by traveling less, or shorter distances, the system is efficient. The opposite is also true, if more travel and longer trips are necessary in order to meet the same needs the system is inefficient.	Comment noted. SCOG does not currently have baseline information on performance measures related to Environment or Resilience, or a baseline for VMT per capita. Policy 3.11 includes future metrics to consider.
53	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	31	Replace with "Regional transportation routes not meeting established MMLOS standards".	Comment noted. Currently this measure refers to the LOS noted for each regional roadway, as identified in Appendix B. MMLOS is not currently available and therefore no baseline information is available.
54	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	31	This sounds more like it would be more appropriate under the "stewardship" goal. This goal is referring to mobility, in which case some other measure would be more appropriate such as revenue hours per-capita, frequency, hours of operation, etc.	Moved to Stewardship goal.
55	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	31	Replace "traffic volumes" with "travel demand" or "multimodal travel demand".	This policy is from the CPPs. Traffic volumes retained to stay consistent with verbiage in CPPs.
56	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	34	The Environment an Resilience goals are the only goals that don't include performance measures. Why aren't there performance measures for these goals? Performance measures should be included for both goals. Suggest that the following performance measures be included in this goal: 1. Greenhouse gas emissions associated with regional transportation. 2. Per-capita VMT 3. Percentage of trips made using transit 4. Percentage of trips made using non-motorized transportation.	Thank you for your comment. SCOG does not currently have baseline information on performance measures related to Environment or Resilience. Policy 3.11 includes future metrics to consider and future performance measures could relate to other goals.
57	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	34	Please explain how improving the environmental quality of a neighborhood will lead to a sustainable transportation system. This makes no sense and seems to be backwards.	Comment noted. Revised text to provide additional clarity.
59	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	34	What does "this" refer to?	Revised text for clarity.
60	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	34	Suggest revising this entire paragraph so that it explain what the goal is and summarizes how the policies below will achieve the goal.	Comment noted. Revisions included in paragraph to clarify goal purpose and consistency with statewide VMT and GHG targets.
61	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	34	What are the acceptable MMLOS standards? Are the specific MMOLS standards identified in this document?	This policy is from the CPPs. Retained language consistent with CPP 3.11.
62	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	34	For policies 6.7 and 6.8, repeating what the CPPs require is not helpful or appropriate. CPPs 14.1, 14.2, 14.3, 3.3, 3.4 and 3.12 are intended to ensure plans such as this identify the targets as goals and include policies reasonably calculated to achieve the goals. Please clearly state the relevant GHG and VMT reduction goals and include policies that will help achieve the goals.	Additional text has been added throughout the plan to reference consistency with VMT and GHG reduction targets.

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ID	Date	Last Name	First Name	Source	Organization	Email	Page #	Comment (Verbatim)	Response
63	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	35	What is a tabling event?	As described in the Community Engagement section of the RTP, tabling events include SCOG participation in community events.
64	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	40	The RTP includes, or should include, strategies for expanding transit service. It's unclear how a strategy might be "promoted".	Revised text for clarity.
65	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	40	To be clear, we need to do more than "meet" future transit travel demand, we need to expand transit ridership and increase the percentage of trips made on transit.	Comment noted.
66	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	40	What does "the plan" refer to in this context? Which plan is being referred to?	Revised to "RTP".
67	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	40	For transit, land-use characteristics, frequency, and hours of operation may be the greatest determining factors in ridership levels.	Comment noted.
68	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	40	Here COVID is mentioned, yet in the section on remote work it is not mentioned.	See revisions to Section 2 "Regional Travel Patterns and Emerging Challenges".
69	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	41	What does it mean to "limit the transportation footprint"?	Text revised for clarity.
70	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	41	What does it mean for a transportation system to be "well established"? Do the authors mean "well designed"? If so, simply say that.	Revised to "well-connected".
71	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	41	It's important that this not just focus on recreation. The point is that certain patterns of travel, and certain travel modes, are associated with positive health outcomes. A better way of phrasing this section might be to say: "A well designed transportation system encourages active transportation modes, such as walking and cycling. Active transportation modes minimize environmental impacts, greenhouse gas emissions, and have been shown to improve physical and mental health".	Comment noted. Revised text.
72	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	41	Suggest striking this section or rephrasing it. Active transportation isn't just for people who CAN'T drive. To the extent references to those who can't drive are included, this should emphasize that expanding active transportation options also improve the mobility for those who cannot drive or lack access to a car.	Comment noted. Revised text.
73	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	47	Suggest that this section lead with a short, plain language explanation of what LOS standards are. Then explain, in plain language, that LOS standard must now consider modes other than vehicle travel.	Comment noted. Added sentence in reference to the general application of LOS standards and that non-vehicular modes must now be considered..
74	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	47	Suggest saying: "WSDOT has not developed MMLOS standards for state facilities and it is unclear when this work might be completed". It's important that we not make excuses for WSDOT. They can make their own.	Comment noted.
75	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	47	The RTP needs to include MMLOS standards.	Comment noted. See response to comment 49.
76	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	47	What about urban areas? What is our standard for regional facilities? what about pedestrian LOS? What standard is being adopted here?	The RTP is recommending a standard for bicycles and pedestrians that measures LOS by facility completeness in urban areas and by shoulder width in rural areas.
77	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	48	This would not be a transit LOS, but rather a measure of land-use outcomes. Adopting such an LOS could lead to absurd outcomes. For example, it would be possible to demonstrate an acceptable LOS outcome through robust development activity even if transit service on the route is reduced to one trip a day. What Transit LOS is this plan adopting?	The transportation planning field generally accepts this measure as a transit LOS metric because it responds directly to transit service configuration changes or additions. Existing routes can move stops closer to activity centers and new routes can be added that demonstrably achieve more accessibility to higher concentrations of residents and jobs.
78	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	48	Where are the LOS standards for Skagit County ferry service?	Skagit County does not set LOS standards for their ferry service.
79	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	48	These percentages should be explained here. The explanation for what these percentages represent is buried in the text below but should be stated here.	Comment noted.
80	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	48	Strongly suggest that this be changed. This promotes inefficient use of resources. Most sailings that are at their vehicle capacity have significant unused passenger capacity. A more nuanced LOS standard that reflects both vehicle and passenger capacity would support better decision making and point in the direction of lower cost options that might make more efficient use of existing facilities. Adding more vehicle capacity is extraordinarily expensive. If an MMLOS standard was applied, reasonable responses might include: - Better parking facilities and better parking management at terminals to promote walk-on travel. - Enhanced transit connections and transit service to terminals to support walk-on travel - Financial support for transit service on ferry dependent islands. - Dynamic pricing that discourages vehicle travel and encourages walk-on/bike travel. Even if SCOG lacks the authority through the RTP to revise ferry LOS standards, this information should be emphasized to encourage future actions.	Comment noted. Ferry LOS is set by WSDOT. Text revised to be consistent with the current long-range ferry plan.
81	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	52	The RTP should include policies that are intended to "reduce per-capita VMT and vehicle related GHG emissions". We aren't just "supporting" the reductions.	Policies on VMT and GHG reduction are included in Section 4.
82	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	52	This needs more. What's needed is a plan to change travel behavior, reduce trip lengths, and shift to transit and non-motorized modes. This isn't limited to trail and transit projects. Also, which transit projects are included in this plan?	Comment noted. Transit projects are described in Section 7, in tables 4-6, and in figure 5.
83	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	52	What are action strategies as opposed to policies? Why is this in a separate section?	The climate change action strategies are intended to provide specific actions that relate to VMT and GHG reduction policies.
84	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	52	To be clear, our obligation is not to simply address VMT and GHG reduction but to ensure the plan includes policies that can be expected to achieve the reductions.	Comment noted.
85	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	52	Rephrase for clarity. Suggest: transportation improvements and funding decisions shall be consistent with VMT and GHG reduction goals.	Revised for clarity.
86	1/21/2026*	Johnson	Brad	<a href="#">Email</a>	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	52	Provide local examples of "ineffective intermodal connections" in this plan. What sort of actions, within the scope of SCOG's authority, might address these ineffective connections? List them here.	Comment noted.

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87	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	52	What is a "non-VMT" action?	Revised for clarity.
88	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	52	What sort of actions, that are within the scope of SCOG's authority, might reasonably achieve these outcomes? List them here.	Comment noted.
89	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	52	This assertion is specious and irresponsible. The idea that increasing vehicle capacity to reduce congestion somehow results in lower emissions has been thoroughly debunked by multiple studies. This needs to be removed.	Comment noted. Additional text in document was cut off. Text box has been expanded to show all text.
90	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	53	This statement is confusing. How does the Skagit region "experience" traffic operations? What does this statement mean? What are "traffic operations"?	Comment noted.
91	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	53	What does "preservation" mean in this context. Are the authors referring to maintenance? If so, please state that.	Revised to "maintenance".
92	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	59	What about MMLOS?	The travel demand model is designed to address roadway performance. Other tools address or can be developed to address non-motorized and transit modes. See the "Regional Multi - Modal Level of Service (MMLOS) Standards" section of the RTP.
93	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	59	Why not?	See response to comment 92.
94	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	59	Do any of these scenarios include meeting our VMT and GHG reduction goals? If not, does it make sense to develop a plan around the assumption that the goals of the plan will not be achieved?	Comment noted. SCOG does not currently have baseline information on performance measures related to Environment or Resilience goals, or a baseline for VMT per capita. Policies are discussed in Section 4 that address meeting VMT and GHG reduction goals.
95	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	63	This entire paragraph should be revised for clarity, consistency with stated goals and policies, and to eliminate contradictory statements.	Comment noted.
96	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	63	This is a very long sentence that says many things, some of which conflict with one another. For example, reconstructing existing arterials to "current standards" means that if the current standard calls for a larger road, a larger road will be constructed. Contrary to what the end of the sentence says, this DOES necessarily mean that additional capacity will be added. Also, what do "operational issues" include? It would be helpful for readers to understand what is included in the term "operational issues". Please provide an explanation or revise to use common language.	Comment noted.
97	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	63	What does this mean? Suggest revising this using plain language. I think, but do not know, that this means the plan does not include enough money to fully address the maintenance backlog that we're aware of. If that's what's intended, the plan should simply say so. Also, why is this financial information included under the "efficiency strategies" heading?	Comment noted. Revised text to address unfunded maintenance backlog.
98	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	63	Existing?	Yes, maintenance and preservation applies to existing transportation facilities. In the sentence commented on, the text specifically says "prior transportation investments" to call attention to the financial investment that was made on the transportation system.
99	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	63	facilities?	See response to comment 98.
100	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	63	Elsewhere the RTP has said that capacity is not being expanded. Depending on which statements are true, there may or may not be a need for difficult decisions. Does the plan envision expanding capacity while maintenance needs go unaddressed or not? Please be clear about the expected outcomes.	Revised text for clarity.
101	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	63	It is well within the scope of the RTP to outline a program of investments that are consistent with the stated goals of the plan.	Comment noted. Revised text for clarity.
102	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	63	This section should reference the language in CPP 3.13.	CPP 3.13 was added to Goal 4.
103	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	64	What about non-motorized transportation?	Non-motorized transportation is included in the RTP through (1) a dedicated Pedestrian and Bicycle Systems section, (2) multiple funded/planned/illustrative non-motorized projects in the project tables, and (3) policies supporting a regional active transportation network (consistent with CPP 3.14).
104	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	69	Impact fees should be listed among the city and county options.	Added bullet on impact fees and included WAC citation.
105	1/21/2026*	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	70	Correct to five. Burlington has a TBD.	Revised text as suggested.
106	2/6/2026	Johnson	Brad	Email	City of Burlington	<a href="mailto:bradmj@burlingtonwa.gov">bradmj@burlingtonwa.gov</a>	General	Detailed comment provided in Attachment B.	Consistency with CPPs: Consistency with CPPs is addressed throughout the RTP and individual CPPs are included as policies in the RTP. Revisions to the RTP includes the addition of CPP 3.13, which was inadvertently left out of the Draft RTP. VMT and MMLOS: VMT and GHG reduction goals and MMLOS are addressed throughout the plan. See responses to comments 8, 10, and 49. Performance Measures for Environment and Resiliency: See response to comment 52 related to future performance measures to consider. Consistency with Land Use Goals: RTP policies are included that address land use considerations and the need to create a transportation system that is coordinated across agencies and considers a denser land use pattern. For examples, see policies 4.2, 4.6, 4.13, 6.1, and 6.6.

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ID	Date	Last Name	First Name	Source	Organization	Email	Page #	Comment (Verbatim)	Response
107	2/6/2026	Clemens	Ryan	<a href="#">Email</a>	WSDOT	<a href="mailto:ryan.clemens@wsdot.wa.gov">ryan.clemens@wsdot.wa.gov</a>	General	General comment on accessibility: When using pictures, charts and tables, it would be helpful to describe where/what it is and what it is trying to emphasize or describe. Describing pictures, charts, and tables with text will help those using screen readers.	Comment noted. Final RTP will include alt text for images and accessibility for screen readers.
109	2/6/2026	Clemens	Ryan	<a href="#">Email</a>	WSDOT	<a href="mailto:ryan.clemens@wsdot.wa.gov">ryan.clemens@wsdot.wa.gov</a>	12	Looking forward to the integration of both the RSAP and TRIP!	Thank you for your comment.
110	2/6/2026	Clemens	Ryan	<a href="#">Email</a>	WSDOT	<a href="mailto:ryan.clemens@wsdot.wa.gov">ryan.clemens@wsdot.wa.gov</a>	13	Thank you for noting the Safe System Approach and for including safer land use as a safety planning approach.	Thank you for your comment.
111	2/6/2026	Clemens	Ryan	<a href="#">Email</a>	WSDOT	<a href="mailto:ryan.clemens@wsdot.wa.gov">ryan.clemens@wsdot.wa.gov</a>	17	Only 9% of trips are for work, which is interesting. Does this only include going to work, or does it also include returning home from work? It seems a little counter intuitive to have the most common trip be returning home when one must first leave to be able to return. I understand it's a survey and there's a margin for error, but it may be helpful to describe what a "trip" is on Page 16.	See response to comment 7.
112	2/6/2026	Clemens	Ryan	<a href="#">Email</a>	WSDOT	<a href="mailto:ryan.clemens@wsdot.wa.gov">ryan.clemens@wsdot.wa.gov</a>	19	The interested Parties table may read better as a bulleted list	Comment noted.
113	2/6/2026	Clemens	Ryan	<a href="#">Email</a>	WSDOT	<a href="mailto:ryan.clemens@wsdot.wa.gov">ryan.clemens@wsdot.wa.gov</a>	25	Thank you for providing the crosswalk for the Regional Goal Alignment and the Washington Transportation Plan. The policy descriptions within the goals are fantastic and help to provide a succinct, digestible, high-level, and all-encompassing picture of region's goals.	Thank you for your comment.
114	2/6/2026	Clemens	Ryan	<a href="#">Email</a>	WSDOT	<a href="mailto:ryan.clemens@wsdot.wa.gov">ryan.clemens@wsdot.wa.gov</a>	46	Thank you for providing descriptions for each mode for MMLOS.	Thank you for your comment.
115	2/6/2026	Clemens	Ryan	<a href="#">Email</a>	WSDOT	<a href="mailto:ryan.clemens@wsdot.wa.gov">ryan.clemens@wsdot.wa.gov</a>	63	The last sentence in the Time Periods box is cut off.	Revised. Thank you.
116	2/6/2026	Clemens	Ryan	<a href="#">Email</a>	WSDOT	<a href="mailto:ryan.clemens@wsdot.wa.gov">ryan.clemens@wsdot.wa.gov</a>	63	The first sentence may need rewording.	Revised. Thank you.
117	2/6/2026	Clemens	Ryan	<a href="#">Email</a>	WSDOT	<a href="mailto:ryan.clemens@wsdot.wa.gov">ryan.clemens@wsdot.wa.gov</a>	65	The numbers in the first two columns are each off by \$100 – doesn't look like it affects the overall total though.	Made minor changes to Tables 9, 10, and 11 to ensure proper summation given rounding in the hundreds digits.
118	2/6/2026	Clemens	Ryan	<a href="#">Email</a>	WSDOT	<a href="mailto:ryan.clemens@wsdot.wa.gov">ryan.clemens@wsdot.wa.gov</a>	65	The numbers in the first column do not add up to the total (off by \$100).	Made minor changes to Tables 9, 10, and 11 to ensure proper summation given rounding in the hundreds digits.
119	2/6/2026	Clemens	Ryan	<a href="#">Email</a>	WSDOT	<a href="mailto:ryan.clemens@wsdot.wa.gov">ryan.clemens@wsdot.wa.gov</a>	66	The numbers in the second column do not add up to the total (off by \$100).	Made minor changes to Tables 9, 10, and 11 to ensure proper summation given rounding in the hundreds digits.
120	2/6/2026	Clemens	Ryan	<a href="#">Email</a>	WSDOT	<a href="mailto:ryan.clemens@wsdot.wa.gov">ryan.clemens@wsdot.wa.gov</a>	71	Should "Plan" be capitalized? The sentence could also remove either the word "its" or "the" to make it read better.	"Plan" is capitalized only when referring to the specific document (Move Skagit 2050 RTP) and lowercase "plan" when generic. Sentence revised to remove extra "its".
Note: Asterix (*) marks the comments received before the beginning of public comment period (01/23/2026)									

ATTACHMENT A

23 CFR 450.324 - Development and Content of the Metropolitan Transportation Plan

Citation	Regulation	Meets requirements?	Notes
(a)	<p>The metropolitan transportation planning process shall include the development of a transportation plan addressing no less than a 20-year planning horizon as of the effective date. In formulating the transportation plan, the MPO(s) shall consider factors described in §450.306 as the factors relate to a minimum 20-year forecast period. In nonattainment and maintenance areas, the effective date of the transportation plan shall be the date of a conformity determination issued by the FHWA and the FTA. In attainment areas, the effective date of the transportation plan shall be its date of adoption by the MPO(s).</p> <p>The MPO(s) shall review and update the transportation plan at least every 4 years in air quality nonattainment and maintenance areas and at least every 5 years in attainment areas to confirm the transportation plan's validity and consistency with current and forecasted transportation and land use conditions and trends and to extend the forecast period to at least a 20-year planning horizon. In addition, the MPO(s) may revise the transportation plan at any time using the procedures in this section without a requirement to extend the horizon year. The MPO(s) shall approve the transportation plan (and any revisions) and submit it for information purposes to the Governor. Copies of any updated or revised transportation plans must be provided to the FHWA and the FTA.</p>	Not fully meeting requirement	The MPO shall consider the Federal Planning Factors. Additional detail on how the MPO has considered each of the factors is requested.
(c)	<p>For purposes of transportation system operations and maintenance, the financial plan shall contain system-level estimates of costs and revenue sources that are reasonably expected to be available to adequately operate and maintain the Federal-aid highways and public transportation.</p>	Not fully meeting requirement	Skagit 2045 was adopted on March 17, 2021; the plan is required to be updated by March 17, 2026.
(f)(11)(i)	<p>The MPO(s) shall consult, as appropriate, with State and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation concerning the development of the transportation plan. The consultation shall involve, as appropriate:</p> <p>Comparison of transportation plans with State conservation plans or maps, if available;</p>	Does not meet requirement	Include system-level cost estimates and revenue sources.
(g)	<p>Comparison of transportation plans to inventories of natural or historic resources, if available.</p> <p>The MPO(s) shall provide individuals, affected public agencies, representatives of public transportation employees, public ports, freight shippers, providers of freight transportation services, private providers of transportation (including intercity bus operators, employer-based commuting programs, such as carpool program, vanpool program, transit benefit program, parking cashout program, shuttle program, or telework program), representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with a reasonable opportunity to comment on the transportation plan using the participation plan.</p>	Not fully meeting requirement	The comment review period is underway. Requesting this topic be covered in the final report.
(g)(1)		Not fully meeting requirement	The comment review period is underway. Requesting this topic be covered in the final report.
(g)(2)		Not fully meeting requirement	The comment review period is underway. Requesting this topic be covered in the final report.
(j)	<p>The MPO(s) shall publish or otherwise make readily available the metropolitan transportation plan for public review, including (to the maximum extent practicable) in electronically accessible formats and means, such as the World Wide Web.</p>	Not fully meeting requirement	The comment review period is underway. Requesting this topic be covered in the final report.
(k)		Not fully meeting requirement	The comment review period is underway. Requesting this topic be covered in the final report.

# ATTACHMENT B

In addition to the comments previously submitted, the City of Burlington would like to offer additional comments on the draft Regional Transportation Plan and associated SEPA DNS.

1. **Vehicle Related Greenhouse Gas Emissions.** The draft Regional Transportation Plan (RTP) does not include any specific goals concerning vehicle related greenhouse gas emissions. The RTP also does not include any clear policy language to ensure future transportation planning decisions are consistent with greenhouse gas reduction targets. In addition, it is not clear that the project list has been evaluated against GHG reduction targets. Washington State requires measures to reduce greenhouse gas emissions (RCW 70A.45.020). The Skagit County Countywide Planning Policies (CPPs) requires that regional and local comprehensive plans meet or exceed the reduction targets adopted by Washington State (CPP 3, 3.3, 3.4, 3.12, 14, 14.2, and 14.3).

14. Climate Change and Resiliency

Ensure that Comprehensive Plans, development regulations, and regional policies, plans, and strategies under RCW 36.70A.210 and 47.80 RCW adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles travelled; prepare for climate impacts and natural hazards; protect and enhance environmental, economic, human health and safety; and advance environmental justice.

14.2 GHG reduction targets will be consistent with Washington State reduction targets as part of the State adopted Transportation Carbon Reduction Strategy per RCW 70A.45.020. (O20250002)

14.3 Comprehensive Plans, capital plans, and the regional transportation plan will consider the effects of climate change. Effects could include riverine flooding, coastal flooding due to sea level rise, wildfire risk, extreme heat, and impacts to water resources such as reduced instream flows, seawater intrusion, and decreased groundwater availability. Preference will be given to policies, actions, and strategies that avoid, minimize or mitigate the impacts of climate change on human health or the natural environment, and that reduce VMT and GHG. (O20250002)

In order to ensure consistency with locally adopted comprehensive plans and the Skagit County CPPs, the RTP should be amended to include policy language which establishes a meaningful framework for future decision making. For example, policy language similar to following might be included: *Transportation projects, improvements, and planning decisions shall not have the effect of increasing per-capita greenhouse gas emissions. Projects reduce transportation related greenhouse gas emissions will be prioritized.*

2. **Vehicle Miles Traveled (VMT).** The draft RTP does not include any specific goals concerning reduction in per-capita VMT. The draft RTP also does not include any clear policy language to ensure future transportation decisions achieve a reduction in per-capita VMT. In addition, it is unclear whether the projects included in the project list have been evaluated against state, local, and regional VMT reduction targets. Washington State requires measures to reduce per-capita VMT (RCW 47.01.440). The Skagit County Countywide Planning Policies (CPPs) requires that local and regional comprehensive plans meet or exceed the reduction targets adopted by Washington State (CPP 3, 3.3, 3.4, 3.12, 14, 14.1, and 14.3).

3. **Transportation**

Encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled and are based on regional priorities and coordinated with county and city comprehensive plans.

- 3.3 The development of new transportation routes and improvements to existing routes shall be consistent with VMT and GHG reduction targets and shall minimize adverse social, economic and environmental impacts and costs, especially those impacts to vulnerable populations and overburdened communities. (O20250002)
- 3.11 An integrated regional transportation system shall be designed to minimize air pollution, including a reduction of vehicle related greenhouse gas emissions and reduction of vehicle miles travelled by promoting the use of alternative transportation modes, reducing vehicular traffic, maintaining acceptable multimodal levels of service, and siting of facilities. (O20250002)
- 3.12 All new and expanded transportation facilities and transportation system improvements shall be sited, constructed and maintained to minimize noise levels and shall not have the effect of increasing per capita VMT or greenhouse gas emissions. (O20250002)

In order to ensure consistency with locally adopted comprehensive plans and the Skagit County CPPs, the RTP should be amended to include policy language which establishes a meaningful framework for future decision making. For example, policy language similar to following might be included: *Transportation projects, improvements, and planning decisions shall not have the effect of increasing per-capita VMT. Projects that reduce per-capita VMT and vehicle travel by promoting alternative modes and addressing future transportation demand through the application of multimodal level of service standards shall be prioritized.*

3. **Multimodal Level of Service Standards (MMLOS).** While the draft RTP discusses MMLOS options, the plan does not clearly adopt standards for non-vehicular transportation modes. In addition, MMLOS standards have not been incorporated into the regional travel demand model, and there is no information related to how MMLOS standards will be used to evaluate future transportation improvement and project selection decisions. Recent amendments to the Washington State Growth Management Act (GMA), clearly require that local governments adopt, and utilize, MMLOS standards. The GMA similarly requires consistency between regional transportation plans and the transportation elements of locally adopted comprehensive plans. The Skagit County CPPs similarly require the use of MMLOS standards in local and regional transportation plans (CPP 3.8).

In order to ensure consistency with MMLOS standards the RTP should clearly identify the MMLOS standards being adopted. The RTP should also include policy language explaining how the adopted MMLOS standards will be applied to future project selection decisions and regional transportation planning actions.

4. **Performance Measures for Environment and Resiliency.** Performance measures are an important component of the RTP policy structure. Performance measures allow the region to assess the effectiveness of its actions over time and make changes, as necessary, to ensure the region's transportation goals are achieved. However, while the RTP includes performance measures for most goals, the Environment and Resiliency goals do not include any performance measures. The RTP should be amended to include clear performance measures for both of these important goals. Examples of suitable performance measures might include vehicle related GHG emissions, per-capita VMT, and the percentage of trips made using active transportation or transit.

5. **Consistency with Land Use Goals.** Each local government has taken steps to direct new growth to highly accessible, mixed-use areas and transit accessible corridors. Over the next 20-years the effects of these land use decisions will create a significant demand for investments in transit and active transportation modes. While the RTP mentions the region's land use objectives, no specific steps are described for adjusting transportation priorities and expenditures to meet these needs. This is not a trivial matter. Since 2019 almost all of the City of Burlington's housing development has occurred adjacent to transit routes, with the majority of new development occurring along the Burlington Boulevard corridor. This pattern of development will require a shift in transportation investments towards non-motorized transportation and transit access. The RTP should clearly describe how the region's transportation system will adapt to future land use patterns.