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Mr. Paul Meyer, Manager
Port of Seattle, Washington (POS)
Environmental Permitting and Compliance
Port of Seattle Pier 69
Post Office Box 1209
Seattle, Washington 98111-1209

Dear Mr. Meyer:

I am writing to you as a Member and the Vice Chairman of the Seattle Freight Advisory Board (SFAB) of the City of Seattle Department of Transportation in the matter of the Draft Environmental Impact Statement (DEIS) for the Terminal 5 Cargo Wharf Rehabilitation and Berth Deepening and Improvements Project of the Port of Seattle from the primary viewpoint of its impact upon freight mobility and transport in the Puget Sound area.

The present Draft Environment Impact Statement (DEIS) of the Port of Seattle Terminal 5 Cargo Wharf Rehabilitation and Berth Deepening and Improvements project (DEIS – POS – TS – CER – BDI) presents an evaluation of a series of modifications which have been suggested at the existing site of the existing Terminal 5 facility in West Seattle. These modifications to the present Terminal 5 facility of the Port of Seattle which have been proposed include the rehabilitation of the cargo wharf facilities as well as to deepen the water channel adjacent to the existing wharf.

There are a series of modifications which are suggested to the existing site of the Terminal 5 facility in order to increase the maximum container handling capacity level and the maximum allowable container ship vessel size. These changes are needed in order to maintain the present service capability of the Port of Seattle in view of the increased vessel sizes following the opening of the expanded Panama Canal where the maximum ship size is expected to increase from the present 4,500 to 8,000 TEU (20 foot equivalent units) to between 10,000 and 18,000 TEU in the future.

There are a series of changes which will be required at the Terminal facility of the Port of Seattle in order to be able to expand and enhance its marine cargo handling facilities on the land and water sides. It is expected that these changes in Wharf Rehabilitation and Berth Deepening at the existing Terminal 5 facility are made in order to increase the maximum container handling capacity levels and the maximum allowable container ship vessel size entering and leaving the Port of Seattle docking facilities.

The driving force behind the necessity for upgrading and expanding the Port of Seattle Terminal 5 facility is based on the basic economic necessity in the World shipping environment in order to maintain its market competitive position with regard to Worldwide shipping patterns with the increasing maximum container ship sizes as the result of the expected opening of the enlarged Panama Canal to be able to handle larger ship sizes.

These changes in the port infrastructure are needed in order to maintain the present marine containers service capability of the Port of Seattle in view of the increased vessel sizes following the opening of the expanded Panama Canal to be able handle ships of greater widths and lengths through its locks. The maximum resulting ship size is expected to increase from the present 4,500 to 8,000 TEU as 20 foot container equivalent units) to between 10,000 and 18,000 TEU in the future which will be able to utilize the Terminal 5 facility of the Port of Seattle provided that it has the necessary physical capacity in its future infrastructure.

There are three separate alternatives which have been proposed for analysis in the present Draft Environmental Impact Analysis of the proposed upgrading of the Terminal facility of the Port of Seattle as follows:

Alternative No. 1: Number Action, Maintain Present States and Arrangement to handle 647,000 TEU per year with Maximum Ship Size of 8,000 TEU;

Alternative No. 2: Rehabilitation of Cargo Wharf and Deepening of Ship Berth to 58 Feet with Increased Cargo Handling Capacity of 1,300,000 TEU per year with Maximum Ship Size of up to 14,000 TEU;

Alternative No. 3: Rehabilitation of Cargo Wharf and Deepening of Ship Berth to 58 Feet with Increased Cargo Handling Capacity of 1,800,000 TEU per year with Maximum Ship Size of up to 18,000 TEU;

An initial review of the Draft Environmental Impact Analysis of the Terminal 5 facility of the Port of Seattle indicated that the expected environmental impacts associated with its construction and operation activities appear to have been adequately addressed in part to the best of the criteria involved in the preparation of environmental reviews based on the knowledge with regard to the existing environmental requirements of the State of Washington and the United States Government.

However, in our review of the Draft EIS document, we have identified the areas of concern which will directly or indirectly impact the future ability to move containerized cargo on the land side by rail or road into and out of the Terminal 5 facility which we believe need to be addressed in greater detail as it is described in the following paragraphs of this letter.

First, we are concerned that the movement up to between three and 24 total freight trains between the Terminal 5 facility and the access to the main railroad lines on the east side of Harbor Island will result in serious periodic blockages of truck movements into and out of Terminal 5 to their main road connections to the West Seattle Freeway and to the Interstate 5 freeway and the State Route 99 highway on a continuing and long term basis.

It is our suggestion that some type of elevated roadway structure needs to be considered to be built outside of Terminal 5 over the main railroad tracks in order to connect to either or both the Southwest Spokane Street bridge route or to the main West Seattle Freeway overhead bridge as a major project. The resulting highway traffic blockages and delays can then be reduced or eliminated to the mutual benefit of both truck and train movements into and out of the Terminal 5 facility of the Port of Seattle to reduce the resulting air pollution emissions and roadway traffic increases which would otherwise occur as a result of the increased road and rail traffic volumes with shipping volumes.

Second, the issue of electrification of the affected Terminal 5 port operations and the trucks entering and leaving the facility is mentioned in terms of the resulting reduction in air pollution emissions and air quality impacts from the trucks entering and leaving the area as well as from the port facility operations. However, what is not mentioned in the Draft Environmental Impact Statement of the Terminal 5 upgrade is the possibility of the electrification of the railroad entering the port or possible use of short haul trips by electric track within the immediate port area between Terminal 5 and Harbor Island and the adjacent SODO District on the mainland area.

It is therefore suggested that a further analysis be conducted either under the present proceeding or separately of having a short electrified railroad shuttle section between Terminal 5 and the main central railroad yard to the east in order to the benefit air quality while isolating the section to be impacted in terms of railroad operations.

This analysis should also incorporate an evaluation of the possibility of having a container shuttle service between the Terminal 5 area and the adjacent SODO district which would utilize electric truck transport

Third, the major shortcoming of the Draft Environmental Impact Statement for the Terminal 5 facility for the Port of Seattle Terminal 5 expansion is that it basically ignores the question of the impacts of these proposed changes on the existing street and road network adjacent to and in proximity of Terminal 5 as well as on the water or on the local businesses in the area. These specific problems as well as the proposed mitigation measures are described in the following paragraphs of this letter in order to develop possible solutions.

The proposed Terminal 5 Berth Modernization Project involves the rebuilding of a part of the Marine Cargo Pier and the associated dredging of the berth area by 20 feet from 36 feet depth to 56 feet depth. There is a concern by the affected Pacific Terminals company that their Berth No. could be periodically blocked by construction barges which needs to be minimized.

The proposed Terminal 5 Berth Modification project will also have impacts upon the Pacific Terminals seawall as well. Therefore, the vessels which are docking at the rebuilt Terminal 5 facility should therefore not be extended to the southern boring of its 150 foot mark.

In addition, the dredging of the Terminal 5 Berth by an additional 20 feet could remove the toe of the slope at the northern boundary of the Pacific Terminals seawall and perhaps cause it to collapse, especially during an earthquake. Some type of geologic study needs to be done of this situation which would include an identification of any possible mitigation measures to be taken.

The proposed Terminal 5 Berth Modernization Project calls for the blocking of West Marginal Way SW to the north of Spokane Street on a permanent basis. As a result the vehicle traffic of cars and trucks to and from the adjacent businesses will be diverted to one of the following two alternative roadway access routes: 1) into an existing or new access road in parallel to West Marginal Way SW to intersect with West Marginal Way SW to the south of the present Terminal 7B; 2) onto the existing ramp on the special lane which then connects to the Lower West Seattle bridge as the main access route into the existing Terminal 5 main gate.

It is suggested that this access ramp to terminal 5 be widened to four lanes and used as a main roadway thoroughfare into and out of the Terminal 5 facility itself as well as to the other existing local businesses with traffic flows in both directions. Then the trucks and leaving cars entering the Terminal 5 area can include both the Port of Seattle and the adjacent businesses to include the Pacific Terminals facility.

These trucks can then access these facilities without being delayed by the freight train movements onto and out of Terminal 5 by crossing the tracks rather than crossing them at the surface. This benefit impacts in a positive way the truck movements into and out of Terminal 5 itself as well as to the adjacent business including Pacific Terminals.

The present plans now call for any street closures in the area of the Terminal 5 Berth modernization to be delayed until the entire construction program has been completed. This plan is an essential requisite for the adjacent businesses in the immediate area in order for them to be able to remain in business while the planned construction is ongoing.

There is a particular concern with these traffic changes because the Lower West Spokane Street Bridge to and from West Seattle often becomes a choke point during the morning rush hour period because of automobile traffic being diverted from the West Seattle Freeway high bridge. This problem becomes serious with long traffic lines and major time delays especially when the Duwamish Waterway low level bridge is opened to facilitate ship passages.

As a result, a series of improvements are needed to the signaling systems on and adjacent to the Lower Spokane Street Bridge to and from West Seattle which may by themselves result in greater roadway traffic volumes for commuters. This problem could become aggravated with the forthcoming closure of the Seattle Waterfront Viaduct which could encourage more automobile traffic on the Lower Spokane Street Bridge.

Any future plans which discourage commuter automobile traffic across the Lower Spokane Street Bridge to West Seattle would be a welcome development. The striping of a third lane on the access ramp into the Terminal 5 area would reduce the potential adverse impacts upon the adjacent businesses to Terminal 5, including Pacific Terminals.

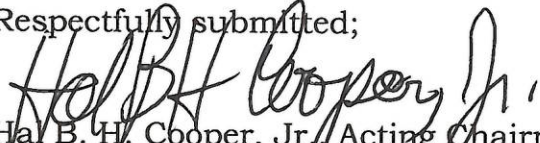
There are presently more than 60 heavy and oversized or overweight or both loaded trucks presently being handled by the existing businesses which are adjacent to the present Terminal 5 facility. These large truck traffic volumes are expected to increase significantly once the Terminal 5 Berth Modernization program is completed into and out of the Terminal 5 facility itself as well as to and from the adjacent businesses, including Pacific Terminals.

The allowance of direct truck access through Terminal 5 for the adjacent businesses would help to mitigate at least some of the expected adverse impacts of the street closures adjacent to Terminal 5. The west access drive option should be explored for the adjacent business to Terminal 5 and the alternative access route previously proposed should be constructed and then limited to trucks and cars entering and leaving the Terminal 5 facility and the adjacent business.

If the above measures are not implemented there are expected to be long delays for truck entry which will require at least a two-shift operation with at least two entry gates. The Port of Seattle has stated that not having long waiting times on the ramp leading into Terminal 5 will not occur to either the Terminal itself or to the adjacent businesses. That promise needs to be kept in the present and future.

We hope that the above comments will be beneficial to your efforts to evaluate the environmental impacts associated with the development and implementation of the proposed modernization of the Terminal 5 facility of the Port of Seattle.

Respectfully submitted;



Hal B. H. Cooper, Jr., Acting Chairman
Seattle Freight Advisory Board (SFAB)

CC.: Mayor Edward Murray
Mr. Scott Kubly
Mr. Christopher Eaves
Mr. Johan Hellman
Mr. Terry Finn
Mr. Warren Aakervik
Mr. Patrick Cohn
Ms. Kristal Fiser
Ms. Katherine Cassedy
Ms. Bari Bookout
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