City of Seattle

Ed Murray, Mayor

The Seattle Freight Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the City in development of a functional and efficient freight system and on all matters related to freight and the impact that actions by the City may have upon the freight environment.

City Council Resolution 31243

July 8, 2016

The Seattle Department of Transportation
Attn.: Gabriela Vega
700 5th Avenue, Suite 3800
P.O. Box 34996
Seattle, WA 34996
Sent electronically to: FreightMasterPlan@seattle.gov

Dear Ms. Vega:

The following comments regard the *City of Seattle Freight Master Plan Public Review Draft, May 2016* (the "Freight Plan"). The comments are provided on behalf of the Seattle Freight Advisory Board, an organization which was designated by the Seattle City Council in 2010 in order to advise city leaders on the "development of a functional and efficient freight system, and on all matters related to freight and the impact that actions by the city may have on the freight environment."

I. Overview

Freight plays an important role in the local economy of Seattle, which serves as a regional hub for freight movement around the state and as a global gateway to international trade, especially with Asia. It is estimated, for example, that seaport operations at the Port of Seattle support more than 23,409 jobs (including nearly 9,000 direct jobs) in Seattle and neighboring communities. Across the state, more than 174,000 jobs are supported by seaport activities at the Port of Seattle. Cargo moving across the seaport's docks represents more than $47 billion of economic activity, accounting for 11.6 percent of the state's Gross Domestic Product (GDP).

In addition to being an important international gateway for freight trade, Seattle also serves as an important West Coast destination for the Great Northern Trade Corridor, which moves freight across the Northern Tier of the United States on highways (such as Interstate 90) and on rails (such as BNSF's "Hi-line"). For example, Seattle serves as an important hub for Class I railroads operated by the BNSF Railway Co. and by the Union Pacific Railroad. Again,

these railroad operations support the local economy as a source of good-paying jobs, privately-funded trade infrastructure, and support for the movement of local products to the global marketplace. As evidence, a recent study by the Washington Council on International Trade found that freight rail contributes more than $28 billion to the state economy – about 7.5% of state GDP – and supports more than 342,000 jobs in the state.

These statistics represent only a small proportion of the total benefit freight provides to the city of Seattle and to the state of Washington. While large trade infrastructure such as seaports, airports, and railroads are among the most visible symbols of this cornerstone sector in our local economy, the greatest impact in policy decisions is felt by hundreds of small- and mid-sized businesses located throughout the city's industrial and manufacturing neighborhoods. These businesses included foundries, delivery companies, construction materials suppliers, diesel repair shops, fabricators, welders, mechanics, and dozens of other services which provide family-wage jobs in neighborhoods throughout the city.

At a global level, freight is synonymous with trade and commerce. However, freight has a more immediate and localized importance as well. In understanding this significance, we start with the following basic question: "What is freight?" The answer is that, in its most basic form, "freight" is all of the material goods we use and consume on a daily basis. Freight is:

- Raw grain, and the finished breads and pastas that are served in restaurants and bakeries and sold at local markets.
- Raw textile fibers, and the clothing and furnishings sold at department stores and boutiques.
- Precious metals, used on the circuit boards of the electronic devices that fuel our modern, communications-savvy, tech-driven lifestyles.

Freight is both raw commodities and the wide range of products we use every day to furnish our homes and enhance our living experiences. In this regard, the challenge is not only how we move freight through Seattle, but also in how we ensure access to continue supplying Seattle neighborhoods with the basic supplies people expect (but often take for granted) in a sophisticated urban landscape.

Finally, freight movement includes transportation at all stages of the product lifecycle – from raw goods to finished products to a product's retirement from its intended usable service. Waste management, therefore, becomes an important issue, especially in a growing, more densely populated city. In short, hauling used products out of local neighborhoods is every bit as important a priority as delivering new ones. For these reasons, it is important that the city's definition of freight mobility includes access for garbage and recycling trucks.

Given the important role freight transport plays in the city, it is gratifying to see the city of Seattle not only recognize the historical benefits of freight in this document but also, and

more importantly, endeavor to ensure freight's continuing viability as Seattle evolves into a diverse and robust international city. It is our hope that the comments in this letter will be incorporated into future drafts of the Freight Plan and that this plan will have the same weight and importance in decision-making as other planning documents, including the Bicycle Master Plan, Pedestrian Master Plan, and the Transit Master Plan.

II. Addressing Roadway Conflicts

As previously discussed, the draft Freight Plan is an important milestone – the first plan in the United States dedicated to freight planning by a city. Having modal plans for all modes raises optimism that the city will move to a truly multimodal planning approach that meets the needs of all users. Again, our hope is that this process continues to recognize and enhance the important role freight mobility plays in the economic vitality and livability of a vibrant and robust city and that this plan bears the same weight and significance as the other modal plans.

We are particularly intrigued by the expanded freight network on city roadways, which includes major truck streets, minor truck streets (for resiliency), and first and last mile connectors. This tiered system should highlight freight's importance when making future planning decisions. In this vein, a greater emphasis on resilience is especially welcome. One element lacking from the current discussion is a recognition that the city's roadway network must be able to accommodate larger vehicles, both on the primary roads and on ancillary roadways. Without this recognition and a strong commitment to enhance access for large vehicles, the roadway network and freight mobility will continue to degrade. Furthermore, jeopardizing freight network resiliency through the prioritization of other modes would be self-defeating to the city's overall livability. Therefore, we encourage an even stronger commitment to freight network resiliency in future drafts.

It is also important to recognize that as residential and commercial neighborhoods around the city become more urbanized and densely populated, meeting the challenge of keeping stores in these areas stocked will become increasingly significant. While it is true that e-commerce will likely increase reliance on small-sized delivery vans, it is also true that traditional brick-and-mortar stores will continue to be served most efficiently by traditional WB-67 trucks. In a landscape of urban villages, people will still buy groceries at grocery stores, and will still shop for clothing, furniture and appliances at department stores and boutiques.

While the configuration of these stores may change from the one-story "big box" format of suburban shopping centers to an urbanized multi-story format, the basic and fundamental need to keep these stores supplied with produce, clothing, furniture, appliances, and other consumer goods will remain unchanged. To that point, the most efficient way of

moving these goods will still be on workhorse WB-67 trucks, one of which can move freight more efficiently and with less impact on local traffic and air quality than a fleet of small-sized delivery vans. As a result, Seattle's increasing urbanization means it is even more important to protect and enhance access for these vehicles.

As population grows, demand for limited road space will inevitably increase leading to increased competition between modes. Recognizing this truth, future drafts must include the following two concepts:

1. A clear commitment that freight mobility needs will be met by prioritizing freight traffic on major truck streets. To this point, we recommend that the design guidelines for major truck streets be amended from the current guideline which reads "design to accommodate all truck types" to a commitment to "design to facilitate all truck types (i.e. design for all truck types), as practicable."

2. A clear and transparent process to ensure that freight mobility needs are appropriately considered when allocating scarce space on the city's roadways. This includes defining performance measures that reflect freight objectives on freight priority facilities and continuing to monitor those objectives. We are optimistic the city's new project development division will be helpful in defining such a process.

We also note the design guidelines in Appendix C are not specific to design features that facilitate truck movement. However, they do provide specific guidance regarding road design treatments for safe interactions between trucks, bicycles and pedestrians. This could have the unintended consequence of limiting truck movements (such as truck turning radii) to the point of infeasibility. Therefore, we suggest the final Freight Plan should specifically provide design guidance to facilitate truck movement, especially on major truck streets and first and last mile connectors.

III. Prioritizing freight mobility in manufacturing and industrial neighborhoods

Freight mobility throughout the city is important. In the city's Manufacturing Industrial Centers ("MIC"), freight mobility is absolutely critical. These neighborhoods rely on efficient, reliable access for all modes of freight mobility, so prioritization in these communities is especially important. These areas also have different infrastructure and roadway design requirements than other urban centers. Even so, the "Draft Strategies & Actions" and "Project Prioritization Criteria" sections of the draft Freight Plan do not adequately address these unique

aspects and needs. Therefore, we submit that the final Freight Plan should provide stronger guidance in the areas designated as MICs. We also note that the sample listing of high-truck-volume streets[1] does not include streets in the Duwamish, such as East Marginal Way or Lower Spokane Street. These areas should be included.

Land use decisions also play an important role in preserving and protecting the unique nature of these neighborhoods, and in preserving the economic development and job opportunities these areas support. Many of these jobs rely on proximity to trade infrastructure such as seaports, railroads and airports. If these jobs and the facilities that support them were transplanted to other parts of the city or to other communities in the region, they would further strain our transportation infrastructure and environmental health by requiring longer travel times between facilities.

Like other commercial clusters (i.e. software or bio-tech), these industrial and manufacturing activities work best when they inhabit the same commercial ecosystem. This is especially true given the tangible, physical aspect of trade, manufacturing and industry. For these reasons, we urge you to carefully consider zoning and other land use decisions that could have severe negative impacts on the city's MICs and to avoid policies and uses that are not consistent with supporting the industrial nature of these areas.

IV. Partnership opportunities with state, federal and private sector

One particularly exciting recent development is the decision by Congress to move ahead with new FAST Act funds. These funds will help to complete projects – such as the Lander Street Overpass – which have been discussed for years if not decades. One theme that is clear from the recent round of FAST Act grant submittals is that the immediate demand clearly overwhelms the funds available, especially for projects such as grade separations at road-rail crossings. Looking ahead, Seattle may wish to compete for additional funds or participate in additional public-private partnerships. To be successful, the city will need to have a robust freight network with enough resiliency to accommodate future upgrades.

Consideration in this regard is especially timely given the emerging regional discussion of road-rail conflicts and the potential need for grade separations and crossing closures in communities across the state. The state legislature's Joint Transportation Committee (JTC) is currently engaged in a study of road-rail conflicts in cities with a stated goal of "recommending a corridor-based process to prioritize the impacts of increased rail traffic." This is a complex issue that warrants further discussion. It is also important to note that while rail traffic is

[1] See pg. 35.

projected to increase, history shows that road traffic will almost *certainly* increase (and, in most cases, will increase at a rate comparable to or in excess of projected rail traffic). The JTC study is one of several processes currently underway in a larger effort to define this issue and to begin shaping possible models for resolution.

As Seattle contemplates its own challenges with regard to road-rail conflicts, it is important that we collectively begin working towards effective community solutions. The first step is to ensure that the freight network has enough resiliency to accommodate future upgrades, as previously stated. An important second step is to begin developing better data to support future decision-making. For example, it might be helpful to begin developing a count of the number of trucks entering and leaving downtown Seattle in order to inform future projects. In so doing, we will collectively develop a better quantitative understanding of the flow of goods through the city.

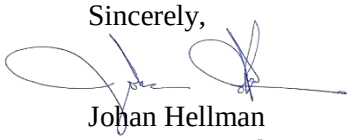
V. Conclusions

In closing, we would first like to reiterate our support for the city's recognition of freight's important role in a vibrant, robust and livable city and express our optimism in working together to achieve common goals to protect and enhance freight mobility.

If there is one common, overall theme in our collective review of the first draft it is that the draft Freight Plan does not make a strong enough statement that the vision of a thriving city requires freight movement as an element of its economic engine and that policy leaders must act to preserve the viability and future vitality of freight through performance measures that ensure resilience and reliability, keeping the freight network whole and competitive. This is especially important for streets that provide for truck mobility and access between and within the MICs, and to the regional highway system. By making an even stronger affirmation of their commitment to freight mobility in future drafts, policy leaders will take an important step in crafting a framework that protects, preserves, and enhances these cornerstone economic drivers well into the future.

In addition to the specific suggestions offered in this letter, we expect that individual firms, businesses and interests from the city's industrial and manufacturing sector will offer their own specific comments. We urge you to carefully consider their suggestions.

Sincerely,



Johan Hellman
Acting Vice Chair