May 2, 2018

The Honorable Ryan Mello
Chair, Growth Management Policy Board (GMPB)
Puget Sound Regional Council
1011 Western Ave., Ste. 500
Seattle, WA 98104

Re: supplemental SEPA scoping comments for Vision 2050 Plan

Dear Chair Mello,

We wish to take this opportunity to clarify our earlier comments about the need for analytical work surrounding the freight mobility system. We appreciate the scoping report and the four areas of focus highlighted by PSRC staff. We believe that the significant changes anticipated in goods movement warrant creation of a fifth focus area for supply chain, transportation, and industrial land uses.

We appreciate that there are limits on the resources that PSRC will be able to muster to perform research and analytical work on each of the in-scope topics. We, therefore, wish to reiterate that there are transformative changes afoot in the goods movement system, and we are only beginning to understand the forces at play. For example, we can point to e-commerce as having an increasing role in the system, but we do not yet understand how it translates to changes in travel demand and land use for both the logistics players as well as for households. Our March 19 scoping letter contains several compelling indicators that a shake-up in the goods movement system is occurring. Just to name one, PSRC’s Appendix J of the VISION 2040 Transportation plan contains the prediction that truck tonnage of goods movement by 2040 will have grown by 56%, out-pacing both the growth in population (26%) and in employment (40%).

Thank you for your consideration of this matter.

Sincerely,

Commissioner Peter Steinbrueck
Port of Seattle Commissioner and Northwest Seaport Alliance Managing Member
GMPB Ports Representative
Scoping For the Vision 2050 Process: Detailed Comments

The ports of Bremerton, Everett, Seattle and Tacoma, along with the Northwest Seaport Alliance, are pleased to join together to submit these detailed comments on scoping for the Vision 2050 Plan. Undertaking major infrastructure investments – and understanding how that infrastructure attracts and anchors commerce – is at the heart of our work as port authorities. Our approach to infrastructure is aligned with the Growth Management Act’s goal for efficient utilization of urban infrastructure. We share the following comments:

Environment and Sustainability

VISION 2040 calls for coordinating environmental planning in the region and using the best information possible at all levels of environmental planning. It recognizes that a healthy environment translates into better human health and improved habitat for wildlife. Specifically, MPP-En-3: Maintain and, where possible, improve air and water quality, soils, and natural systems to ensure the health and well-being of people, animals, and plants. Reduce the impacts of transportation on air and water quality, and climate change. We would support similar goals and policies, consistent with our long term goals, for Vision 2050.

Industrial lands and Manufacturing / Industrial Centers

- As with other forms of employment centers, great care is needed in the designation of Manufacturing / Industrial Centers (MICs). However, the needs of MICs differ from other centers in important ways. Chief amongst these differences are that residential uses are not compatible with MICs and serving a MIC with transit involves challenges not present in other centers.
- As Vision 2050 is scoped and analytical work is performed, earlier analyses of industrial lands can be instructive. Just to note a few issues that have arisen in earlier analyses of industrial land:
  - Past analyses have relied heavily on coding under the North American Industrial Classification System (NAICS) for all jobs in a given area. The results can be misleading since NAICS is concerned with the economic function of a given firm, not the land use. As an example, a marina is completely compatible with industrial zoning yet its NAICS code falls into a family of NAICS codes that are all recreation and leisure-oriented businesses.
  - Non-industrial businesses located in an industrial land can skew the picture for the number industrial jobs in that area. This is because uses like railyards, cargo terminals and warehouses have a low density of industrial jobs, yet these uses may be functioning as anchors to the industrial area.
  - Similarly, the value of cargo terminals and railyards is not captured by analyses that rely on assessed improvement values (building values) as a proxy for economic impact.
• Industrial areas adjacent to downtowns can face persistent pressure to convert to non-industrial uses. Industrial zoning is not always crafted in a way that prevents new uses from becoming established at a critical mass. This, in turn, fuels speculation of future upzoning of the area. Regional MIC designation can help provide certainty to land owners that the area will remain industrial. Port of Everett’s program to record notices on the property titles for neighboring properties is an example of the extreme measures required when sensitive uses are not adequately buffered from industrial uses.

• Most industrial areas can trace their history to critical infrastructure such as seaports, airports, or rail lines. As pressures mount to convert industrial areas, planning policies must recognize situations where it is impractical or impossible to relocate the infrastructure. Deep water ports are a prime example of such infrastructure.

• The MICs in the region should each be allowed to grow according to their individual merit and their natural advantages. The system of regional designation of MIC’s should not pit the MICs against each other.

• Also important to our region is understanding and responding to the region’s aviation needs. We expect that Vision 2050 planning can make use of findings from PSRC’s regional aviation baseline study.

Freight Mobility

• **Economic growth:** We appreciate PSRC’s Transportation 2040 Update draft’s inclusion of our region’s economic strategy goal to “compete globally,” and the reference to strategies that are designed to support industrial lands, maritime sites, trade and logistics infrastructure, and freight mobility. Ensuring that freight can reach our facilities is critical to our success. For that reason, we would encourage PSRC to use, and further develop existing land use and transportation planning tools to ensure that both PSRC’s land use planning and transportation program development protect, preserve and improve existing maritime, rail and truck infrastructure, especially in the region’s MICs, and along the corridors that provide access to these areas. Please be sure to include improvements to these models in your scope of work for Vision 2050.

Your own Transportation 2040 update shows the importance of making this effort: Figure 1, in Appendix J, the Freight element, shows that between 2016 and 2040, truck tonnage is expected to increase by 56%, far outpacing both employment (40%) and population (26%) growth. The federal government is projecting that annual tons per capita will increase by 27 percent from 55 in 2010 to 70 in 2040. Our region would be remiss in not addressing these dramatic increases in the movement of cargo, most of which will occur by truck, so that it does not hamper future economic growth.

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1 Transportation 2040 Update, Appendix J, p. 1.
• **Innovation**: Technological innovation in connected and autonomous vehicles, shared mobility solutions, and ITS enhancements have the potential to greatly enhance our region’s ability to manage ever increasing demand for scarce transportation infrastructure. This is true for both the movement of people and goods and Vision 2050 must address both. Consider that connected vehicle technology, efforts such as FHWA’s Freight Advanced Traveler Information Systems (FRATIS) program, implementation of block-chaining technology in logistics, and extending signal priority to trucks along major freight corridors are viable solutions to improving freight mobility. Implementation of freight supportive technologies like these should be supported by Vision 2050. We would be happy to work with our staff and the relevant advisory committees on these issues.

• **Regional integrated freight network**: PSRC’s freight network is currently focused on major freight facilities in region, but unfortunately, it is based on incomplete information. Appendix J of the Transportation 2040 Update draft, provides a good overview of some of the major freight facilities in the region. This includes marine- and airports, all rail facilities (including yards and related lead tracks,) and pipelines in addition to T-1 and T-2 truck corridors. However, not all jurisdictions consistently and thoroughly report data on truck volumes on major truck corridors to WSDOT, so the system is incomplete. Another issue of concern is that there is comparatively little coordinated effort to ensure that jurisdictions along truck freight corridors maintain system continuity. We hope PSRC can address these issues as part of Transportation 2050. The system map also does not yet include designated over-legal routes, or heavy haul routes important to the ports, and the regional economy. A more robust regional freight network must be supported by a grant funding distribution scheme that maintains and improves the functionality of the existing system while providing investment in strategic system expansion.

• **Data and analytics**: Appendix J of the Transportation 2040 Update draft, while providing a wealth of data from federal and state sources, clearly shows that PSRC is currently lacking detailed data, modeling, and analysis tools to determine local and regional freight activity, performance, and needs. We strongly encourage PSRC to scope, and budget for, a more robust freight data collection and analysis approach that provides quantitative information on the corridors critical to freight as part of Vision 2050. This effort should support the development of a more robust freight plan, similar to the approach taken by the Southern California Association of Governments (SCAG,) in Transportation 2050.