

January 31, 2018

Via e-mail: Transportation2040@psrc.org

Josh Brown, Executive Director
Puget Sound Regional Council
1011 Western Ave # 500
Seattle, WA 98104

Re: Comments on the PSRC Transportation 2040 Update

Dear Mr. Brown:

Thank you for the opportunity to provide comments on PSRC's Transportation 2040 Update. The Northwest Seaport Alliance (alliance) is a port development authority governed by the Ports of Seattle and Tacoma. The alliance unifies management of the Ports' marine cargo facilities and businesses to strengthen the Puget Sound gateway and attract more marine cargo and jobs to the region. In 2013, facilities now managed by the alliance generated 48,000 jobs and \$4.3 billion in economic impact by moving \$73 billion in international trade through its facilities. This activity generates \$379 million in state and local revenue every year.

We appreciate your staff's efforts in developing the draft update. We hope the final product will be a plan that will provide a solid basis for future efforts to maintain and improve our region's transportation network so that it can meet the needs of a growing economy and dynamic global trade, and support a high quality of life, healthy environment and social justice. A well-functioning and well-maintained multimodal transportation system that supports the efficient, reliable and cost-effective movement of freight is also critical to the success of our region.

We offer the following comments both in response to the draft update, and to provide initial input into the scoping effort for Transportation 2050. The following includes recommendations for implementation actions related to freight mobility, which, combined with those from other reviewers, may warrant a freight-specific implementation section:

- **Economic growth:** NWSA greatly appreciates the 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.

Freight mobility is essential to the overall economy and quality of life of the region. Appendix J (Regional Freight and Goods Movement) quotes WSDOT's Freight System Plan, indicating that "up to 80% of all truck trips in metropolitan areas are generated by deliveries of goods and services in the regional and local distribution system."¹ Figure 1² shows that between 2016 and 2040, truck tonnage is expected to increase by 56%, far outpacing both employment (40%) and population (26%) growth. Annual tons per capita are forecast to increase 27 percent from 55 in 2010 to 70 in 2040.³

This issue is entirely missing from the list of key issues identified at the end of Appendix J, yet the region's success in addressing it will affect every resident and business in the region, every day. The update should highlight the need to address this reality, and set the stage for a more robust and visible approach to addressing freight needs in Transportation 2050.

- **Maintenance and preservation:** We agree that maintaining and preserving the existing transportation system should be a high priority for the region. We encourage you to include consideration of maintenance and preservation of the functionality of the system in making decisions. This should include preserving the capacity of existing (and future) freight transportation system, as well as those corridors that are critical in ensuring the system provides sufficient resiliency in case of a large incident like an earthquake. Seattle's approach in defining its truck street system, described in the Freight Master Plan, could serve as an example.
- **Safety:** Safety is our highest priority. We appreciate that the draft update is focused on the most vulnerable transportation system users, pedestrians and bicyclists. As large trucks and other freight vehicles potentially pose particular dangers to non-motorized, and other system users, we encourage you to incorporate road/rail/terminal safety and freight operation conflict resolution needs in PSRC's safety programs. New approaches to ensuring the safety of all users while maintaining their functionality for freight and transit, like Seattle's Complete Corridor (rather than Streets) Program, can help achieve these goals.
- **Innovation:** Technological innovation in connected and autonomous vehicles, shared mobility solutions, and ITS enhancements will 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. Unfortunately, the innovation section in the plan update is exclusively focused on the movement of people. Yet, 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 both the 2040 update and Transportation 2050.

¹ Appendix J, p. 7.

² Appendix J, p. 1.

³ FHWA, Freight Facts and Figures 2010.

- **Regional integrated freight network:** Appendix J, and in particular Figure 2⁴, provide a good overview 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, and there is comparatively little coordinated effort to ensure that jurisdictions along truck freight corridors maintain continuity. 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 project selection criteria that maintain and improve the functionality of the existing system while providing investment in strategic system expansion.
- **Data and analytics:** Appendix J, 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 prepare for a more robust freight data collection and analysis approach that provides quantitative information on the corridors critical to freight. 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.

In summary, we hope the Transportation 2040 update will set the stage for Transportation 2050, to develop, and implement, a regional freight strategy, covering all modes, to:

Improve data collection and analysis, design, operations, safety to increase the resiliency and strategic capacity of the region's freight system.

Thank you again for the opportunity to comment on the draft update. We look forward to working with your staff as PSRC begins to embark in a more robust Transportation 2050 plan update. Please do not hesitate to contact Christine Wolf on our staff, at 253-888-4414 or by e-mail at cwolf@nwseaportalliance.com, with any questions or concerns.

Sincerely,



Deirdre Wilson, AICP
Senior Planning Manager
Northwest Seaport Alliance

⁴ Appendix J, p. 5.