



August 8, 2014

Freight Systems Division

C/O Barb Ivanov

Dear Ms. Ivanov, *(Hi Barb!)*

Thank you so much for the opportunity for the Port of Seattle to comment on the Draft 2014 Washington State Freight Mobility Plan. Port staff has appreciated the partnership role you have provided the Port in the development of many areas of this planning effort. Due to that partnership, which enabled us to address our own goals and needs throughout the process, the Port is in support of all stated federal and state policies and goals which value the economic benefits of moving goods and people in Washington, the country's most trade dependent state. These goals mirror the Port's mission of moving both people and goods and its Century Agenda goals.

The Port is very pleased to see the innovative concepts and approach you devised to develop the Draft Freight Mobility Plan. In particular, we commend you on the designation and identification of Freight Economic Corridors (hoping that you will take our advice and add Heavy Haul Corridors and Seattle's waterways to the list of facilities that are included by definition). Increasing the awareness of the importance of these corridors for the economy of the entire state is essential to ensure their continued functionality in light of decreasing funds and increasing modal competition for scarce transportation infrastructure. Above all, we look to the state for guidance in the identification and implementation of projects which improve freight mobility, and the importance of securing funding to get projects built. We recognize the importance of this document in meeting the requirements of MAP-21 which can lead to increased freight funding for Washington State. Your comprehensive and collaborative effort in identifying an initial list of freight projects along these corridors will be very helpful in planning for implementation in the future. Of course, realizing that the project list is an initial document, we are looking forward to working with you on future updates.

Since the Port believes this Plan is important for the future of freight mobility in Washington State, we called on many Port resources to review the document. The Port of Seattle might be one of the few stakeholders who critically rely on all freight travel modes, especially waterways, roads, rail and air. While many of our comments below are simply general statements about the Plan, we also call out specific pages where we have comments that update, clarify or in some cases correct text in the Draft Plan. We address substantive issues on a chapter by chapter basis below and then provide minor technical edits at the end of the letter. We would be happy to meet with you and your staff if you need elaboration on any of our comments.

Below are the Port's general observations and substantive comments:

Chapter 1: Strategic Goals

The Port of Seattle's Century Agenda is wholly supportive of and is totally in line with the State's strategic goal to "Ensure that the transportation system in Washington State supports and enhances trade and sustainable economic growth.

In addition, the Port strongly supports the three key Washington state freight objectives which include Urban Goods Movement, Global Gateway and Urban economies. Each play an important part for our gateway port which require both urban and rural freight systems to operate efficiently.

Chapter 2: Economic Context of the State Freight Transportation System

The Chapter does a good job of laying out the important supply chain of products moving through Washington State. It also identifies the need for localized movement of goods from production to warehouse to store shelves. The Chapter also refers to the "Freight Economic Corridors" (page 14, paragraph 2) currently moving the great majority of goods through the state. The Port recommends including here a reference to the definition of Freight Economic Corridors which appears on page 35.

Page 13 (Freight Supports our Regional Economics): Text begins with "Some of the most important made-in-Washington supply chains include:", but that list is not provided. The following text in this section includes references to manufacturing, fuel and agricultural supply chains, but the information could be organized and presented more clearly.

Page 21 (Delivering Goods to You): Section describes local distribution systems. In addition, the section could include overnight package delivery and e-commerce. The overnight express package business has time constraints similar to hospital/medical deliveries.

Chapter 3: State Freight Institutions, Statutory Constraints and Roles

Page 31 (Ports): Please add "and responsibilities" to the first sub header under Ports to make it consistent with the descriptions of other public entities (Governance Structure and Responsibilities).

Page 31: (Ports): After the 1st sentence of paragraph 1, insert" Specific authorities granted by the legislature make Washington's public ports the only public agencies whose primary purpose is economic development. Ports create jobs and economic growth by owning and operating or leasing shipping terminals, marinas and docks, airports, industrial sites, railroads, and parks and recreational facilities."

Page 31 (Ports, Funding Mechanism): Add as last sentence: We would also like to note that, while ports typically fund infrastructure within their gates, ports have funded public infrastructure that is needed to make goods movement more efficient and mitigate the impact on the community at large. At the Port of Seattle, the Port has funded \$300 M for the Alaskan Way Viaduct Replacement Program and has partnered to fund the East Marginal Way Grade Separation, SR-519 and other FAST Corridor projects.

Page 32 (Railroads): This corridor hosts WSDOT's sponsored passenger rail service but also provides benefit to freight rail movement.

Page 32 (The FAST Corridor Partnership): The last sentence is a bit out of date. The FAST program identified 24 projects and 20 are now complete. For specifics, you may want to talk to Sean Ardussi at the Puget Sound Regional Council.

Page 32 (The Great Northern Corridor Coalition): Last sentence should include Washington State members of the coalition. Sentence could read “The Montana Department of Transportation is the lead agency and Washington State Coalition members include The Washington State Department of Transportation, Washington Public Ports Association, Port of Seattle, Port of Tacoma, Port of Everett, Port of Quincy, Port of Pasco, Port of Grays Harbor, Port of Vancouver, USA and the Port of Longview.

Page 34 (Sales and use tax streamlining law): You may want to add a sentence that states that some communities that are negatively affected by the tax law may decide not to permit new warehousing, which would have a negative impact on goods movement, including the gateway ports. We have heard this most prominently from the cities of Kent and Auburn.

Chapter 4: State Freight Transportation Assets

Page 35: (Highways & Roads): There is no reference to the Washington State Ferries role in carrying freight. Are the Seattle/Colman Dock routes not at least T-2? Don't many of the island economies depend on ferries for their deliveries? This may have repercussions throughout other sections of the plan.

Page 36 (Truck Freight Economic Corridors): Suggest I-90 paragraph adds “This route connects eastern Washington agricultural businesses and other industries, ‘as well as states farther east,’ with urban markets in ...

Page 42 (Waterways): Please include the Duwamish Waterway and the Chittenden Locks/Ship Canal on the list of Waterway Economic Corridors: We suggest the following text be added at the end of the waterway section:

The Lower Duwamish Waterway and the Lake Washington Ship Canal with the Chittenden Locks are critical first/last mile waterways, similar to first/last mile connectors on the roadway, and short lines on the rail systems. The lower Duwamish Waterway is a critical lifeline for Alaska—about 95% of goods moving from Seattle to Alaska, as well as a portion of Hawaii cargo, originate there. In addition, the lower Duwamish serves Nucor Steel, Ash Grove Cement, Delta Marine and a multitude of other businesses that depend on the waterway. The fishing fleet home-ported at the Port of Seattle's Fishermen's Terminal, as well as the many ship-building, retrofit and repair businesses located along the Ship Canal and in Seattle's Lake Union, depend on the continued operation and functionality of the Chittenden Locks and the Ship Canal.

Page 45 (Marine Ports): We would recommend that you call this section “Ports” and then add sub headers for “marine” or “coastal” and “river” ports.

Page 45 (Marine Ports): It's incorrect to say that West Coast ports do not require dredging. Grey's Harbor is in the middle of a deepening project. The Port of Seattle and Port of Tacoma also need dredging.

Page 45 (Marine Ports): The Port suggests you expand the scope of "Marine Port" to touch on Puget Sound ports' trade in bulk (non-containerized) cargo, grain, fishing, and the cruise industry.

Page 46-47 (Airports): The statewide percentages don't correlate well to Sea-Tac data, particularly with regard to the % domestic, % international, and the Asia/Europe split. The last one is troubling in that no state airport other than Sea-Tac has Asia/Europe cargo trade. (in 2013 Sea-Tac was 64% domestic freight/36% international, and of the international it breaks down 25% Asia/11% Europe - quite different than the stats in the report).

Page 47: (Airports): The statement about cargo aircraft RON at Sea-Tac does not seem correct. Sea-Tac does a lot with RON but it is overwhelmingly passenger aircraft RON. Cargo RON is almost non-existent outside of leased areas.

Page 47: (Airports): The final paragraph appears to be characterized incorrectly. No one in the industry includes "both plane and cargo weight" together. They look at one or the other for different needs but never conflate the two. Thus the next sentence summarizing "cargo activity" is erroneous, and gives inappropriate weight to BFI and Spokane.

Page 46-47 (Airports): The report states that there were 24 Washington State airports that reported air cargo activity in 2009. The next paragraph states that 11 Washington State airports reported cargo activity in 2011. Did the number of airports reporting air cargo activity drop by 13 in two years?

Chapter 5: The Condition and Performance of the State's Freight Transportation System

All of the data maps in Chapter 5 are very difficult to read due to their size. Will the final document have larger maps?

Page 53-54 (State of Repair: Highways): Please add information on the percentage of highways in different conditions to the text, to make it parallel to the information provided on other system elements.

Page 55 (State of Repair: Bridges): This section discusses "functionally obsolete" (FO) bridges as being a particular problem on State Truck Freight Economic Corridors when they prevent legal truck loads. Where are these bridges? Are they included on Exhibit 5.4 (Bridges in Poor State of Repair)?

Page 60 (Create section on Heavy Haul Corridors): Please add a section on heavy haul corridors, noting those already in existence, and how the State can assist ports in identifying and implementing heavy haul corridors. The Port suggests the following language:

A Heavy Haul Corridor is an identified series of roadways within a port district designed to address overweight load problems currently faced by companies that move sealed ocean-going containers

between marine terminals and intermodal facilities, such as rail yards. Generally, the distance travelled by trucks is less than two-miles. Where heavy haul corridors don't exist, truckers can be ticketed for moving freight in excess of the posted weight load.

Washington State Code RCW 46.66.0915: (Heavy haul industrial corridors-Overweight sealed containers and vehicles), provides that the department of transportation, with respect to state highways maintained within port district property, may, at the request of a port commission, make and enter into agreements with port districts and adjacent jurisdictions or agencies of the districts, for the purpose of identifying, managing, and maintaining short heavy haul industrial corridors within port district property for the movement of overweight sealed containers used in international trade

The Port of Tacoma, utilizing the RCW's provision and with coordination from the City of Tacoma, WSDOT and others, has set up heavy haul corridor to facilitate movement of containers within their harbor area on standard marine chassis so that the shipper does not have to incur the additional cost of using a tri-axle or "super" chassis to move the container a short distance at low speeds.

In order to make this happen, a coalition of stakeholders, including local transloaders, warehousing and trucking companies, the Washington State Patrol, Washington Department of Transportation, City of Tacoma and Port of Tacoma, met regularly over three years to establish Tacoma's Heavy Haul Industrial Corridor.

In the interest of international container freight movement more efficient, WSDOT should continue to support ports seeking the identification and implementation of heavy haul corridors, and work with local jurisdictions and stakeholders to promote the importance of these facilities.

Page 67-68 (Safety): This section should include some discussion of safety issues that exist between travel modes. In port and industrial areas there is often conflict between bicycle and pedestrian activity with heavy truck movement. There should be some discussion regarding pedestrian and bicycle safety on Freight Economic Corridors.

Page 70 (Preservation of Rail-Served Industrial Sites): The paragraph referencing the Container Ports Element (in King & Pierce County) needs additional context, especially followed by the Clark County reference. The paragraph does little to describe what the Governor's Container Port initiative is, its purpose and its recommendations. There needs to be a more robust summary.

Page 71 (Waterways): Please include the Lower Duwamish Waterway and the Washington Ship Canal (up to Lake Union)/Chittenden Locks in this section. It will be critical for both waterways to work with the Coast Guard to maintain priority for commercial shipping activities in light of increasing pressure to limit bridge openings for general purpose roadway traffic, especially during commute hours or before and after special events. The lower Duwamish may require maintenance dredging, and maintaining the current functionality and hours of operation for the Chittenden Locks is important for the fishing fleet and commercial operators along the Ship Canal up to and on Lake Union.

Page 72-73: (Airports): The paragraph on page 73 is no longer accurate in terms of 747-8 parking as the Port is physically expanding those parking positions this summer. In addition, it is too general to say that "Sea-Tac is also constrained by its location". There are many opportunities to increase air cargo activity at Sea-Tac. The whole paragraph should be removed.

Page 74 (Federal Efforts to Reduce Diesel Emissions): A few more recent examples of federal grants include recent awards to the Port of Seattle for its drayage truck scrapping and replacement program (ScRAPS 2) which results in use of cleaner trucks. The Port of Seattle was awarded \$3.5 million in CMAQ funds in 2012 and \$1.2 million in DERA funds for this project.

Page 75 (State Efforts to Reduce Diesel Emissions): the Port of Seattle was awarded a \$500,000 grant in 2013 for the ScRAPS 2 project to scrap and replace drayage trucks with cleaner vehicles.

Page 77 (Port Efforts to Reduce Diesel Emissions – Northwest Ports Clean Air Strategy): This information is a bit out of date. We suggest that the text be revised to include information about the 2013 Update to the Northwest Ports Clean Air Strategy. The updated Strategy can be found at http://www.portseattle.org/Environmental/Air/Seaport-AirQuality/Documents/NWCleanAirUpdate_2013_FINAL.PDF; the executive summary provides a concise explanation of the new emission reduction goals for diesel particulate matter and greenhouse gases from port-related truck and rail for the years 2015 and 2020. Additionally the updated Strategy includes revised targets for port-related truck and rail for the year 2015, and new targets for the year 2020.

Page 77 (Port of Seattle): There is more current information on our program at our webpage: <http://www.portseattle.org/Environmental/Air/Seaport-Air-Quality/Pages/Clean-Trucks.aspx>. For example, the Port launched a new truck scrapping and replacement program, dubbed ScRAPS 2, in May 2014. This program, which is partially funded by federal and state grants, will provide incentives to replace at least 220 older drayage trucks with those having model-year 2007 or newer engines.

Page 79 (Waterway Performance Measures): Is Blocking the spread of invasive species an appropriate measure of a Freight Transportation Plan?

Page 80 (Potential Air Cargo Performance Measures): The first two performance measures "sorting facility capacity" and "apron capacity" are on-airport and thus are not under state control (one of the guidelines for performance measures listed on page 78). It would be inappropriate for the state to fund "sorting facility" or apron pavement construction projects on-airport. These first 2 performance measures should be removed.

Chapter 6: Washington State Freight Forecast

Page 86 (FAF3 Forecast): The first sentence of the second paragraph is confusing. Perhaps adding the word "was" before the word "approximately" would add some clarity. The way it's currently worded makes it sound like the outbound traffic is part of the inbound traffic.

Page 86 (FAF3 Forecast): The Port also recommends rewriting the first sentence in the third paragraph. Perhaps "In addition, 29 percent of the 2010 volumes had neither an origin nor a destination in the state."

Page 95 (Air Freight Forecast): Port staff noticed some inconsistency with the discussion of the Air Freight Forecast. Page 81 states that "Air freight in Washington is expected to see small increases over

this time frame (2011-2030). The report also concludes on page 96 that “Air Freight in Washington State is expected to remain relatively stable with the potential for modest growth over time. However, the language in the Air Freight Forecast section on page 95 says that the “weight and value of air freight will increase dramatically between 2011 and 2030.” This is also shown in the accompanying table showing the change of weight and value between 2011 and 2030.

Page 95-96 (Air Freight Forecast): One of the Port’s Century Agenda goals is to triple the annual air cargo volume to 750,000 metric tons in the region over the next 25-years. The Freight Mobility Plan should reflect this significant growth in this section.

Page 95-97 (Air Freight Forecast): The Plan states that the State of Washington’s freight system moved a total of 172.8 thousand tons of freight in 2011. However, in 2011, Sea-Tac alone had 279.9 thousand metric tons of cargo (234.6 thousand metric tons freight). In addition, where did WSDOT get a total valuation from? The Port can get Commerce data for the value of international freight, but has not seen the value for domestic freight. Thus the 2030 projection is off, and low, as well. The Port also wonders why the Plan shows a forecast tonnage growth at 5% annually, but value growth at 7%.

Page 96-97 (Air Freight Forecast): The first paragraph on page 96 discusses “intrastate” air cargo”. The Port’s air freight planners assume this means “within state”, as opposed to interstate/international. Based on Sea-Tac’s experience, air cargo that is intrastate (at least that would actually fly on an airplane) is minimal at best. The Port wonders if the report is referring to “last mile” air freight” that is actually moved by truck? If so, it should be in the trucking section, as it would be indistinguishable with other non-air freight. And, if this is intrastate, and viewed from a statewide basis, how could “inbound” and “outbound” not increase by the same amount? Where does the imbalance come from?

Page 97 (Freight Scenario Planning): The discussion of Freight Scenario Planning might fit better in Chapter 9 (Stakeholder and Public Outreach).

Chapter 7: Overview of Trends, Needs and Issues

This section provides a rather intriguing “crystal ball” view of a select list of potential future developments affecting freight in Washington State. The information is not always presented in chronological order—expected trends are described before information about real events or data is given. Changing this approach would make it more readable. Somewhat concerning from the Port’s point of view is that a significant portion of the future trend information discussed in this section appears to be treated as absolute reality, which may or may not be accurate. It would be helpful if the section acknowledged the fickle and/or recent nature of some the trends listed. In addition, the contents would be more useful if it were broadened to provide a clearer nexus to the listed trends’ relevance for Washington State, and to encompass related needs and/or issues which Washington (or its partners) would need to address to ensure the continued viability of its freight system in the face of these trends.

In addition, despite the section’s generic title, the information in this section is based on a select set of highlighted topics. It would be beneficial to discuss trends, needs and issues in a way that provides a more comprehensive view of the factors expected to affect freight mobility in Washington State in the future. We would recommend adding information related to employment growth and

manufacturing/industrial/fishing in this section. Industries like aerospace and fishing/maritime/industrial will continue to be important contributors to the state's economy and their freight needs should be considered. Even if there are no recognizable "new" trends—or if it is difficult to establish existing trends with any certainty—it will be important for the economy of the state to accommodate their needs to ensure that they continue to thrive. Recent economic cluster and PSRC's ongoing industrial lands studies may provide some context for central Puget Sound; other MPOs may have carried out similar analyses.

Page 99-101 (Population and related freight growth): It would be helpful to add a forecast related to per capita cargo growth. FAF3 says that overall per capita cargo growth between 2011 and 2040 is 27 percent (from 55 tons on 2010 to 70 in 2040.) What might the e-commerce trend related on page 101 mean in this context, especially for the urban parts of the state?

Page 100 (Population growth): The paragraph about emissions seems a bit out of place in the population growth section. Maybe this can be addressed in the new technology section?

Energy (Pages 101-102): The discussion of trends in this is very intriguing, yet we wonder about the level of certainty with which some of the conclusions in this section are drawn. Will these trends—and related impacts, needs and issues—some of which are at this point simply expected, some of which are still rather new, indeed materialize? What might they mean for Washington State? Who would have responsibility for addressing impacts? It might also be helpful to discuss indicators that may be used to verify these expected trends are indeed stable trends.

Pages 102-103 (Competition facing Washington State Ports): Similar to our comments on the Energy section, we are wondering about the degree of certainty with which the assertions in this section are made. While it is true that some of these trends are likely, maybe even very likely, to occur, there are no guarantees.

Page 102 (Competition facing Washington State Ports): In the third paragraph, the Port recommends changing the sentence from "Three global carrier alliances.....and service offerings" to "the industry is evolving into large global alliances like the G6 and CKYHE to lower unit costs through vessel sharing." In addition, The P3 was refused approval by China and has been halted.

Page 103: (Competition facing Washington Ports): The report quotes the Journal of Commerce stating that it costs between \$300-\$400 less for a container to be shipped through Prince Rupert compared to a Washington state container port. What is the source of this information? The Port has understood the difference was between \$100-\$200 dollars per container. The higher number could encourage a shipper to look to Prince Rupert. Perhaps it's best to say that the US Harbor Maintenance Tax makes it more expensive to bring boxes into US Ports but there are many ongoing efforts to reduce that financial difference.

Page 104 (second paragraph): The final sentence in the new equipment technology section discussing positive train control uses the term "lack of available spectrum for two-way data." This is not clear to the reader. We suggest describing this problem better or dropping its reference.

Pages 104-105 (Freight operation changes and constraints): With the exception of the final paragraph on page 105, the focus of this section is on changes in trucking and includes subjects already mentioned in prior sections. Trends related to operational changes related ocean cargo are presented in a section above. It may be helpful to revise this section and focus it on the trucking industry.

Page 105 (Freight operational changes and constraints): This section ends with the statement that “freight rail capacity limitations in the western states do not support a large scale modal shift.” However, we have heard consistently that the Class I railroads will provide capacity increases as the demand grows. Minimally, text could be added to the paragraph reading, “... without investment in new capacity by the railroad companies.”

Chapter 8: Strengths & Problems of the State’s Freight Transportation System

It would be helpful to review how this chapter relates to chapters 6 and 7, which also discuss forecasts, trends, needs and issues. It would seem there is a bit of overlap in the “problems” section of this chapter—maybe the document could be shortened by combining some of these sections? (We do understand that you were trying to stay with the format suggested). We would also like to encourage you to review the headers for subsections of this chapter and ensure that they a clear overview of their actual content. In particular, the last two paragraphs related to ports in the trucking challenges subsection seem incongruent with the remainder of the section—and its header.

Page 108 (Third Paragraph): The last sentence says “There are opportunities to expand air cargo services at the Spokane International Airport.” Port staff feels it’s more appropriate to say there are several air cargo airports in the State with room for expansion.

Page 108 (Retail and wholesale distribution): References “plans to complete ... Highways 167 and 509” While these projects are included in the long range regional transportation plan, it must be noted that these project plans are stalled until a funding source is determined for construction.

Page 109 (Washington State Freight systems have an important role in national security): The last sentence “There are very few.....Port Hadlock” Is unclear. Is there a relationship between the two sentences?

Page 109 (Preservation of freight infrastructure): The inclusion of the second paragraph addressing gentrification and land use seems to be out of place here. Perhaps you could add “Land Use” to the section title or make it a section of its own. The second paragraph needs to be edited to reflect the importance of land use preservation for freight. Rather than “continual pressure to infill....for use of access routes.” we suggest language such as “There is incompatible land uses around railroads and ports includes some commercial, residential and school land uses. Several efforts have been made to resolve these both at the federal and state levels. Sea-Tac International Airport and the FAA have completed Noise Remedy programs to buy-out residential neighborhoods and schools existing adjacent to the airport. The Washington State mandated “Port Container Elements” in the Seattle and Tacoma comprehensive plans are another example of planning to reduce incompatible land uses. (Continue

with existing text beginning with “There is a need to preserve these critical freight-intensive ...Green River Valley).

Page 109 (What challenges do we face?) An additional challenge is lack of funding (insufficient revenue) for state transportation improvements.

Page 110 (Congestion impacts freight dependent businesses in real, measurable ways): “Significant congestion along I-5 and highways 167, 509, 99 and I-405 should be clarified to say “I-5 segments such as the Joint Base Lewis-McChord complex and from Tukwila to Seattle are congested during peak hours....”

Page 110 (Congestion): You may want to separate roadway and rail congestion.

Pages 111-112 (Trucking Companies face numerous challenges to provide safe, reliable and cost competitive services): This section appears inconsistent with the container port trends section in Chapter 7. —here, the document is projecting less congestion due to increased competition, which is in contradiction to your assertion on page 102 that larger ships will create larger surges of containers which have the potential to increase short-term congestion.

Page 111 (last paragraph): The Port prefers to state things in a more proactive and positive way. Instead of saying “If national retailers shift goods to the all water route.....less congestion at the state’s container ports.” We prefer to say “In order to keep goods coming to Washington State the Ports must provide competitive service which will result in increased business for the ports and a better balance of containers for export.

Page 112 (Second Paragraph): Include Midwest in the sentence “...containers are destined for the Midwest and east coast.”

Page 112 (Trucking Companies face numerous challenges to provide safe, reliable and cost competitive services): Discussion at top of page referencing container market share at 3.46, 3.56 and 3.6 million TEUs could be characterized as “flat” or without growth rather than “down” Further, the market share would be better reference as percent of West Coast volumes rather than total TEUs.

Page 116: (Planning Process): Missing list of recommendations of the 2014 Technical teams reconvening!

Chapter 9: The State’s Decision-Making Process

The Port appreciates the strong stakeholder outreach that happened through the course of this planning effort. We also believe that the timing of the State Freight Mobility Plan provided for a great collaboration with MAP-21 and the use of the State Freight Advisory Committee.

In addition, the effort to create a cost/benefit tool that can evaluate the economic benefit of projects and help in the prioritization process is a good start to future project evaluation. The freight Mobility Plan called for the inclusion of statewide agency projects on the State’s Freight Economic Corridors. The

cost benefit tool can be used over the next few years to demonstrate the benefits of each project and lead to a prioritization effort.

Chapter 10: The State's Freight Improvement Strategy

The Port supports the State's freight improvement strategy. This includes a revision of submitted projects using Least Cost Planning and Practical Design techniques to ensure that projects will provide the highest benefit for the cost.

The Port also supports the plan recommendations, most which have been adopted or approved as part of other efforts. Having these together in one document is very helpful. As discussed in the Port's meeting with WSDOT on July 10, 2014, we are submitting air freight recommendations below for inclusion in the Plan.

Page 131 (Following Freight Waterway Recommendation): Add new section titled Air Freight Recommendations. This includes recommendations from the State's Freight Advisory Committee portfolio on Air Freight. Recommendations should include:

Air Freight Recommendations:

State

- Convene Joint Transportation Committee (JTC) briefings on Washington State Air Freight needs and how state agencies play a leading role in strategic aviation economic development centered on air freight cargo development and intermodal opportunities.
- Ensure that the JTC evaluates investment, both public and private, that first supports economic corridors outlined in the 2012 Connecting Washington work.

State Government with local support

- Identify the need for additional financial resources from the State to be allocated for strategic aviation economic development projects, including those projects that contribute to freight mobility objectives based on a list of projects submitted by local government, airports or through MPOs/RTPOs.
- Ensure that Airport operators are brought into the membership of the MPO/RTPO as independent subject matter experts on aviation and air freight mobility. If the form of government will not allow the Airport representative to have an independent voting membership, the Airport should at minimum be included on the Technical Committee of the MPO/RTPO.

Federal/State/Regional

- Air freight movement by surface transportation to and from air cargo airports should be considered as part of the Transportation Plans (or equivalent) that are developed at the metro and regional levels as encouraged in MAP-21.
- MPOs/ RTPOs should consult with airports in their air cargo related planning activities.

- Encourage air cargo airports to address intermodal planning that includes freight movement by surface transportation to and from their facilities as part of airport master plans as they are updated.
- Treat aviation capacity as a resource and preserve, protect, and enhance it through strategies focusing on airport operations, technology, safety, and land use.
- Develop comprehensive policies and investment strategies related to freight and aviation to allocate funding in a more efficient way by emphasizing economic corridors.

Federal

- Encourage Congress to protect AIP grant spending levels and ensure AIP is used only for aviation-related purposes.
- Encourage the FAA to measure all air cargo activity, including cargo transported in passenger planes.
- Congress should strive to achieve a balance between safety and security and an efficient supply chain. Goods movement should not be a secondary priority in this discussion.

Exhibit 101L-106L: Project List

The list of all identified projects with freight benefit on the Freight Economic Corridors is a critical part of this plan. First, it was a tremendous effort to work and engage all the different agencies who provided input. Second, MAP-21 legislation requires that a project be listed in a State Freight Plan for it to receive federal funding.

The Port's mission to create jobs "by advancing trade and commerce, promoting industrial growth, and stimulating economic development" relies on collaboration with our partner agencies to access our terminals and facilities. Such routes provided by the state include, but are not limited to Interstates 5, I-90, I-405 and State Routes SR-99, SR509, SR518, SR519 and SR599. We have a long history of collaborating with partners in regional transportation, including the FAST Corridor, SR509, SR518 and the Alaskan Way Viaduct Replacement Program. Of the projects listed here, we want to highlight the importance of improving both the state routes and last mile connectors providing access to Port facilities. We recognize significant new revenue will be required to implement projects such as the completion of SR509 in King County, but recognize that the economic benefits are well substantiated by such investments.

Chapter 11: Implementation Plan

For reasons which have been discussed thoroughly here and elsewhere, new revenue for freight mobility is needed from at both the State and Federal level. We believe the economic benefits of such investment highly leverage the existing assets of the public and private sectors and all the Washington

State economy to function as the most trade-dependent state. This plan can make that case even more strongly in order to move to implementation and maximize the state's return on investment.

Technical Edits

Page 100 (Agribusiness Trends box, Seafood): Add a comma after the word "production".

Page 101 (third paragraph): Not sure about the term "plants that use natural gas as a feedstock" Perhaps using "energy source" is clearer.

Page 104 (Freight operation changes and constraints): The section's fourth paragraph references "smaller straight trucks." It is not clear what a "straight" truck is.

Page 107 (Title): Instead of "Problems", use the word "Challenges". It sounds more positive and it's consistent with the section title on page 109 ("What challenges do we face?")

Page 108 (First Paragraph): Throughout the Plan you reference "SeaTac International Airport." While the City is SeaTac, the airport is Sea-Tac International Airport.

Page 108 (inside the box): Provide some definition of a "fulfillment center."

Again, thank you for the opportunity to comment on the WSDOT Freight Mobility Plan. If you have any questions or need clarification, please feel free to contact me at 206-787-3376.

Sincerely,

A handwritten signature in blue ink that reads "Dan Burke". The signature is written in a cursive style with a large, looped initial "D".

Dan Burke

Program Lead Planner

Regional Transportation Planning

Port of Seattle

