



# City of Seattle

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Freight  
Advisory  
Board

July 28, 2016

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Scott Kubly, Director  
City of Seattle, Department of Transportation  
c/o Mark Mazzola, Environmental Manager

Seattle Municipal Tower

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Sent electronically to: [BGT\\_MissingLink\\_Info@seattle.gov](mailto:BGT_MissingLink_Info@seattle.gov)

Dear Mr. Kubly:

The Seattle Freight Advisory Board is writing in response to the Draft Environmental Impact Statement dated June 2016 regarding the “Burke-Gilman Trail Missing Link Project”.

We support the need to complete the missing link to completion of the Burke Gilman Trail but we are concerned about irregularities in the DEIS especially as they relate to safety of trail users and impacts to Shilshole, a major truck street.

Irregularities that stand out to us include:

- The DEIS did not recognize any industrial use on NW 54<sup>th</sup> St. between 24<sup>th</sup> and 28<sup>th</sup> Ave NW.
- Industrial driveways are to receive consideration as a safety concern according to the DEIS, (page I-4). Driveways on NW 54th between 24<sup>th</sup> and 28<sup>th</sup> Ave NW were not included or analyzed in the DEIS- a serious omission.
- Driveway counts are not differentiated between residential or industrial use (pages I-11, I-13, I-15 and I-17) so a driveway with one car per day is counted the same as a driveway used multiple times by trucks and other commercial vehicles.
- Driveways on both sides of NW 56<sup>th</sup> were counted yet only driveways on one side of the street on Shilshole Ave NW were counted giving the false impression that Shilshole Ave NW has fewer driveways.
- The report states that 4,050 vehicles enter or leave driveways along the impacted segment of Shilshole Ave NW each day (technical appendix 4-11). The report also states 1,720 bicycles and 565 pedestrians (technical appendix 4-20) are estimated to use Shilshole Ave NW daily. This volume of traffic would seem to be a safety concern that deserves more consideration and analysis. Sight distances from driveways and the fact that trucks need to back out of driveways along Shilshole and NW 54<sup>th</sup> were not examined as significant safety issues.

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

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- Salmon Bay Sand and Gravel deserves special attention. 325 trucks use their south driveway daily. Yet, the PM truck count (page 4-11) shows 5 trucks per hour which would be at the slowest time of their day and not reflective of their use. All truck counts should be between 0700 and 1300 hours.

The impact to parking from completing the missing link is listed as follows:

- Parking spaces eliminated:

Shilshole North:	227 spaces
Shilshole South:	261 spaces
Ballard Ave:	198 spaces
Leary Way:	103 spaces

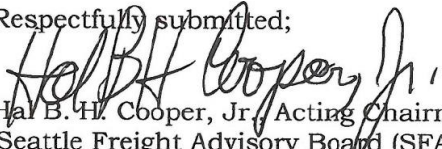
The numbers speak for themselves and appear to be accurate. The State has asked that this industrial area not be further impacted.

- Ave 54<sup>th</sup> NW is listed as a 66' wide street, what is not included in the report is the bank of the street that makes much of it unusable, normal traffic is already difficult without the addition of designated exclusive bike/pedestrian lane.
- Maritime Industrial users are especially vulnerable as they have no option to relocate if the trail significantly impacts their operation. It is not clear if the DEIS includes all the square footage (water and uplands) in the analysis of industrial usage.

We recommend a supplemental DEIS that addresses the irregularities as they relate to safety as the next step in the process. The decision makers and the public have the right to an accurate and impartial FEIS.

It would appear that any alternative to Shilshole Ave North or South would be safer for users of the trail. NW Market has safety implications on the south side at 24<sup>th</sup> NW and 26<sup>th</sup> NW.

Respectfully submitted;

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