

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION

UNION PACIFIC RAILROAD COMPANY,)
)
Petitioner,)
vs.)
)
CITY OF FIFE, WASHINGTON,)
)
Respondent.)
_____)

DOCKET NO. TR-961394

STATEMENT OF
OBJECTION

TO: The Secretary,
Washington Utilities and Transportation Commission
1300 S Evergreen Park Drive SW
Olympia, WA 98504-7250

Two former mayors of Fife, Carl Stegman and Bob Mitzukami, concluded at the hearing that **the only solution** to the problem of expanding rail siding in the Fife area is **construction of an overpass at 54th Avenue East at the grade crossing.** CMC Heartland Partners (CMC) endorses their conclusion and urges the judge to reject the proposed grade closure at 54th Avenue East. in Fife, Washington on account of inadequate mitigation and for reasons that are harmful to public safety and well being. The petition is fundamentally defective for several reasons:

1. At least 16,000 additional truck trips generated by the new Hyundai terminal on Port of Tacoma Road. The Port of Tacoma announced signing a terminal operating lease with Hyundai Shipping Lines. The initial container volume be will be 160,000 Twenty-foot Equivalent Units(TEU). However, that volume is expected to increase quickly and will likely surpass 200,000 TEU's in a short term. It is well known by the petitioner that not all this new container traffic will go on rails. At least 10-15% will depart the Port of Tacoma via trucks. The first year of operation will produce at least 16,000 new truck trips. In addition as the petitioner also knows this volume peaks on ship arrival dates,

which will peak on some days and disappear on other days. This phenomenon is known as peaking. The Port of Tacoma Road and I-5 intersection will experience a new wave of congestion. Closing 54 Avenue East forces even more traffic through the I-5 and Port of Tacoma interchange, which is near gridlock now. Improvements slated for the intersection cannot handle the cumulative impacts of Hyundai and closing 54 Ave. Consult the attached map to see a summary.

2. The petitioner's traffic study was inadequate because it failed to analyze the impact that closing 54th Avenue East would have to traffic destined and originating south of the Puyallup River. While Transpo's analysis may be correct in August of 1996, the scope of analysis ignores some obvious facts that will become increasingly evident concerning future growth patterns. For example, the fastest growing area in Pierce County lies directly to the south of Fife. Fredrickson, the industrial base of the county, lies 22 miles directly to the south of Fife. In both cases, the closest access to I-5 is via 54 Avenue East. To accommodate this traffic the county has funded two initiatives. First, the county has asked and received funding for a new and larger bridge across the Puyallup River to replace the Melroy bridge. Secondly, the county is also improving the route to 54 Avenue East by expanding Canyon Road, a major arterial that connects to the Melroy Bridge and will connect to the new bridge.. All this traffic , which the analysis ignores, will reach I-5 via two routes. First over the two lane Frank Albert bridge and then to the Port of Tacoma Road interchange. The alternative is to cross the UPRR main line at 70 Avenue East, which is on grade and then swing east to Valley Ave. or 20 Street East, and then access I-5 at the intersection of 54 and I-5. The public safety implications and resulting congestion are obvious

3. Any substantial increase in traffic volume over the two lane, steep grade Frank Albert bridge will jeopardize public safety! Due to port developments alone, truck traffic will surge. Even petitioner's traffic analysis concludes a good deal of the 5700 daily trips will migrate to the Frank Albert bridge and then to the Port of Tacoma Rd. interchange to I-5. However the steep grade and necessity for 90degree turn as the southern end of the bridge will cause traffic pace to move at a pedestrian rate because the trucks will not be able to move out of low gear. Because the bridge is two lanes, emergency vehicles will not pass until they can see beyond the crest of the grade; response time will suffer. Passenger vehicles will be tempted to pass slow moving trucks without adequate visual clearance. Add high traffic volumes and the danger to the public is inescapable. The accident probabilities soar. Visit the site and see if any reasonable person could disagree.

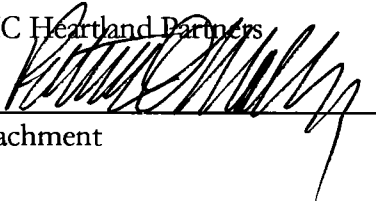
4. Closing 54th Avenue East at the UPRR grade crossing results in a dead end to an arterial connected to I-5 within half a mile from I-5, thereby destroying half the value and effectiveness of a complete intersection and creating an environment harmful to public safety.. This year the Weyerhaeuser company invested \$20 million to build a complete intersection at I-5 and Northwest Landing. If the Department of transportation had built the same intersection the both the time and the cost would have doubled. Rendering arterials with direct access to intersections on I-5 is not only horrible policy, it is financially irresponsible. A valuable public asset is trashed and no public gain experienced. The result of failing to build an overpass will cost the public in productivity losses from congestion, impede emergency vehicle response time, and create an environment for risk taking and accidents.

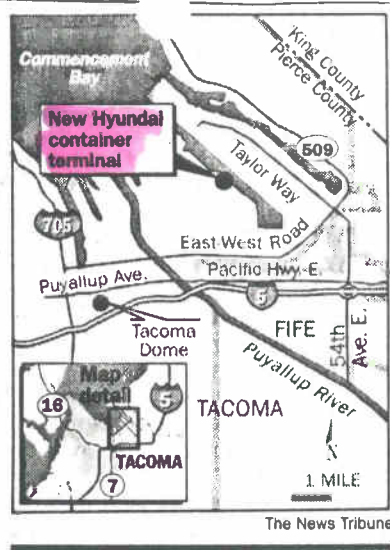
5. The petitioner's traffic analysis is inadequate because it omits the 800 planned unit residential development to be constructed by Heartland and the resulting increase in vehicle trips along 54 Avenue East. Both the petitioner and the respondent in this action have been silent regarding this development on property bounded by 54 and 70 Avenues to the east and west, and bounded by the UPRR tracks to the north and levee road to the south. However the public safety implications cannot be omitted at this hearing nor by the Washington Utilities and Transportation Commission. The current location of all emergency services in the Fife area are north of the UPRR crossing. For the reasons given in paragraphs 1-4 emergency vehicle access must be direct and not circuitous. Emergency access time is critical for a community of 800 homes. Only a overpass at the UPRR crossing meets this compelling need for safety.

In the alternative, the City of Fife, by guaranteeing adequate response time to support petitioner's proposal, cannot at a later date require Heartland to build emergency facilities as a condition to permitting the development. Put another way, if the emergency response time is satisfactory for Fife to support closure of 54 Avenue , then Fife cannot require Heartland to build such facilities.

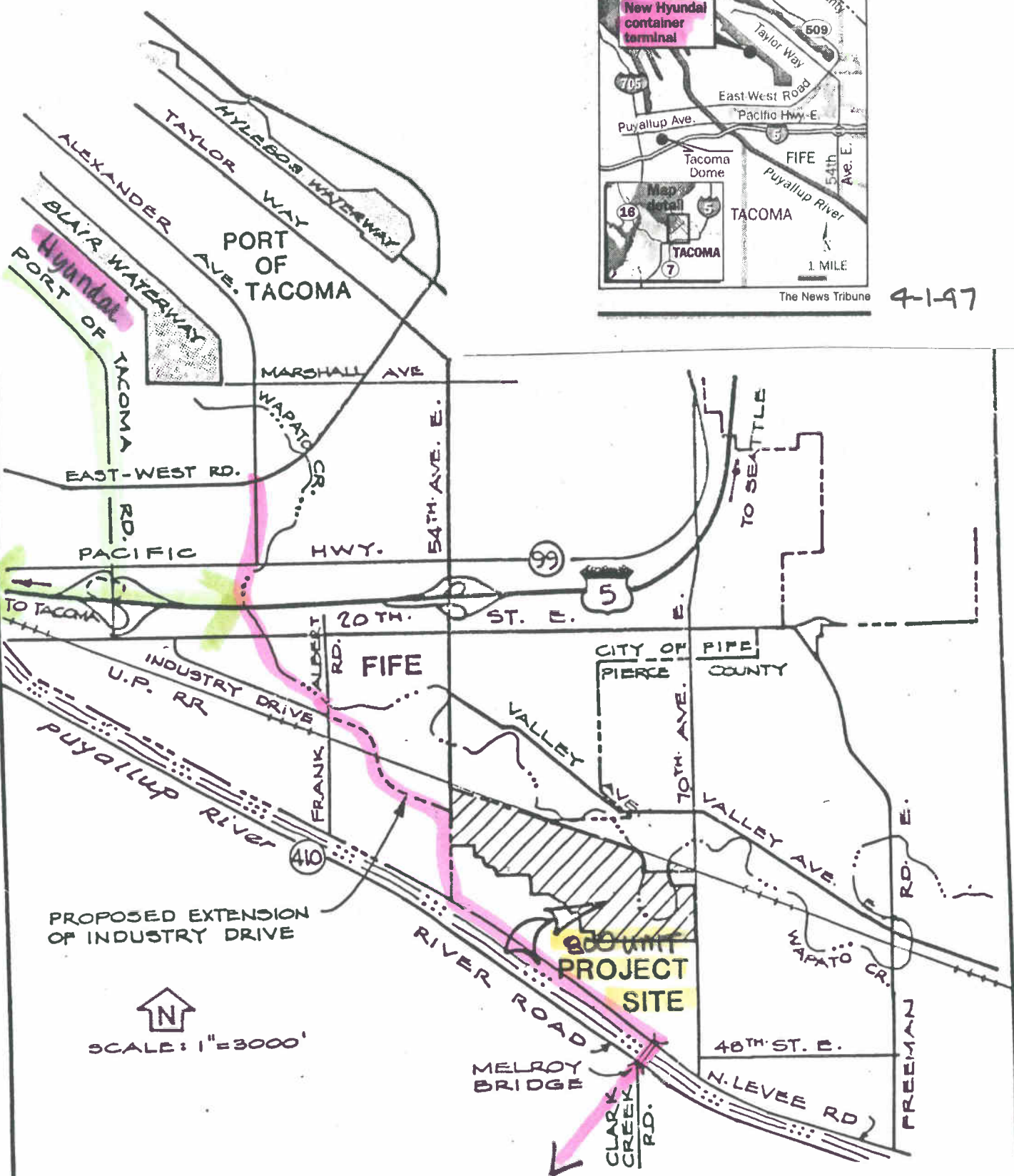
DATED: This 15th day of April, 1997.

CMC Heartland Partners

By: 
Attachment



4-1-97



To: Canyon Road
 Frederickson
 South Hill - Puyallup

LEVEL OF SERVICE YEAR 2000 TRAFFIC EXISTING SYSTEM

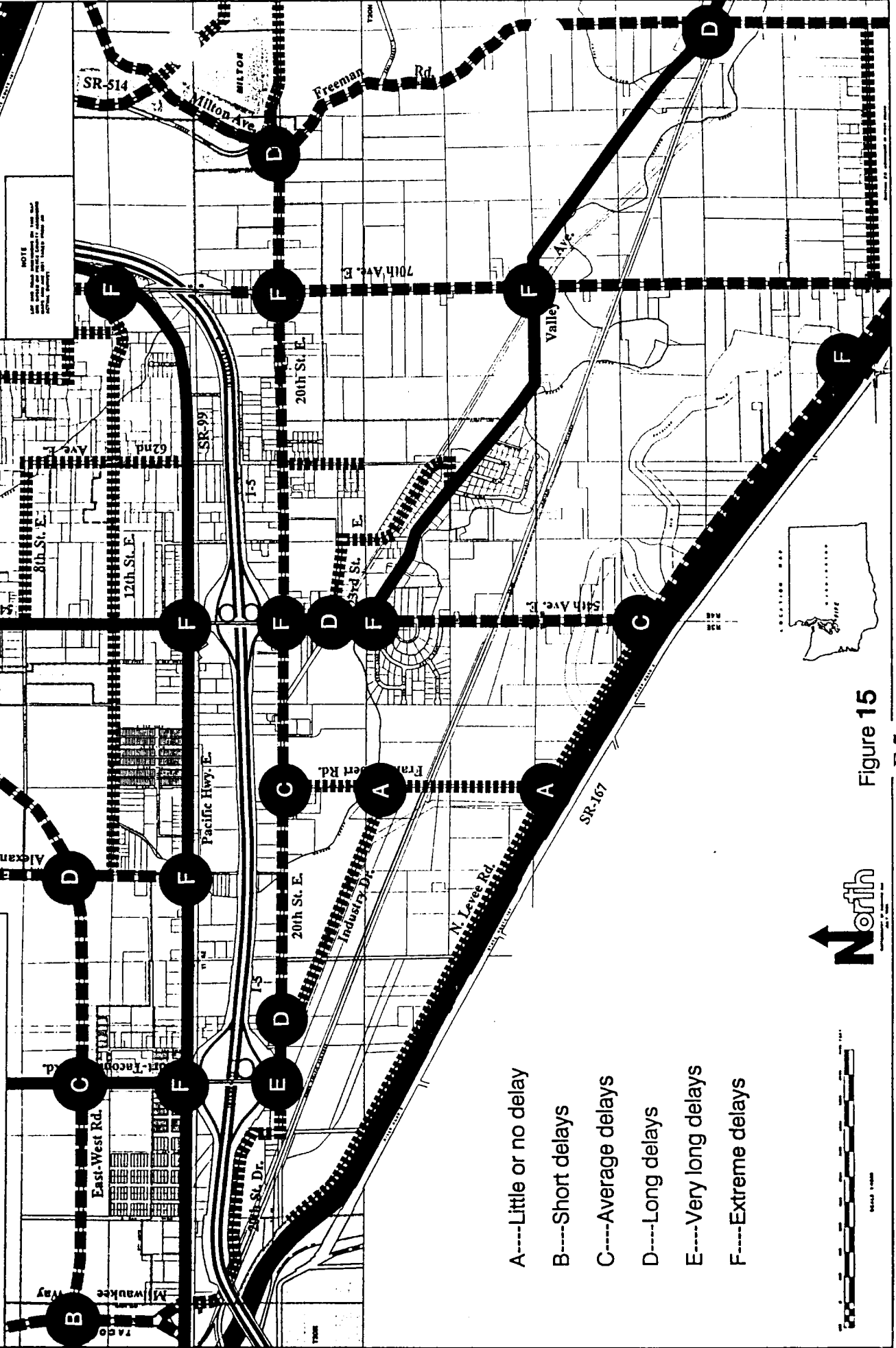


Figure 15