

Industrial and Maritime Strategy
Comprehensive Plan Amendments
Staff Draft Letter

Timeline

- February 23 – Discussion
- March 9 (today) – Staff Draft Letter
- March 23 – Revised Draft Letter
- April 13 – Action on Final Draft Letter
- April 24 (tentative) – City Council Land Use Committee public hearing

Proposed Comprehensive Plan Amendments

- The text of the proposed amendments can be reviewed on pp. 47-53 of Chapter 6 (Appendices) of the Industrial and Maritime Strategy Final Environmental Statement.
- A link to the FEIS and its individual chapters is located here: <https://www.seattle.gov/opcd/ongoing-initiatives/industrial-and-maritime-strategy#projectdocuments>

Proposed Comprehensive Plan Amendments

- We will not be discussing the specifics of the Industrial and Maritime Strategy itself. The Stakeholder Advisory Group's recommendations were documented in a final report and studied in both a Draft and Final EIS.
- The proposed Comprehensive Plan amendments are the first step in adopting and implementing the Industrial and Maritime Strategy recommendations.

Proposed Comprehensive Plan Amendments

- Majority of the proposed amendments are in the Land Use Element. Minor edits are proposed to the Container Port Element Land Use Policies.
- The Shoreline Areas Element contains land use policies for industrial land adjacent to Seattle's shorelines.

Commission Questions and Comments

- Below are responses to questions and comments at the February 23 Commission meeting on the Industrial and Maritime Strategy Comprehensive Plan Amendments.

Question: What is the role of the Planning Commission in reviewing and commenting on these Comprehensive Plan amendments?

Response: The primary purpose of the Planning Commission's comment letter is to offer suggestions on the language of the proposed amendments. The Commission is not revisiting the FEIS or the preferred alternative.

Question: Are any regulatory changes being proposed along with these Comprehensive Plan amendments?

Response: Two ordinances in addition to the Comprehensive Plan amendments will be considered this year by City Council. These ordinances include establishment of new industrial zones and selected rezones of industrially zoned land to implement the Industrial and Maritime Strategy.

Question: Was a preferred alternative proposed for the Industrial and Maritime Strategy?

Response: A preferred alternative was identified in the FEIS.

Re: **CP 1.3** Discourage non-industrial land uses, such as stand-alone retail and residential, in industrially zoned areas to minimize conflicts between uses and to prevent conversion of industrial land in the vicinity of cargo container terminals or their support facilities.

Question: Why not “prohibit” instead of “discourage” (“prohibit” is used in LU 10.68)? Those areas are unwelcome for walking and biking. If retail uses are allowed, incentives or requirements for safety should be considered.

Response: There is a need for some limited retail in industrial areas to support workers.

Question: Retail should be discouraged in all industrial areas. Where is that included in these amendments?

Response: See Comprehensive Plan policies **LU 10.2** and **LU 10.1012**. The proposed legislation tightens the size of use limit and adds a new limit of 0.4 FAR so that there will be no destination retail such as is found in Interbay or Ballard. Also, some industrial uses have a public-facing component. Examples include distilleries/breweries, makerspaces, etc.

Re: **LU 10.68** Prohibit new residential development in industrial zones, except for certain types of dwellings, such as caretaker units or, potentially in urban industrial zones, dwellings targeted to workers that are related to the industrial area and that would not restrict or disrupt industrial activity.

Comment: Concern with the existing wording “such as caretaker units”. Caretaker units are not defined in the industrial land use section of the Comprehensive Plan. This language could open the policy to interpretation.

Response: Caretaker units are currently allowed and are defined and limited in the zoning code.

Comment: Concern that the proposed wording ‘targeted’ doesn’t have strong boundaries. Suggest the alternative wording “intended for workers” with restrictions imposed for those who could occupy those residential units in urban industrial zones.

Response: The proposed wording has been reviewed by the City’s Law Department. The City cannot limit housing by occupation or place of occupation. The Office of Housing does use affirmative marketing for residents, such as with 12th Avenue Arts. That would be the vehicle for targeted outreach to local workers.

Comment: The proposed residential units will be in Ballard, Interbay, SODO, and Georgetown. Those places are generally projecting a mix of uses co-located with light rail and will support the proposed employment densities. The evolution of industrial uses will result in fewer impacts to future residents.

Response: The Preferred Alternative would add capacity for approximately 3,000 units of new housing, focusing on workforce/middle-income housing. About half would be located outside of the M/ICs in new mixed-use areas like Judkins Park, Ballard and Georgetown. About half would be in industrial areas as a conditional use with a workforce housing requirement.

Comment: The first statement in the existing policy LU 10.58 is “Prohibit new residential development in industrial zones, except for certain types of dwellings, such as caretaker units...” Encourage OPCD to be more explicit in recognizing the legacy of environmental injustice related to locating residential units in or adjacent to industrial areas that has had disproportionate impacts on low-income and BIPOC populations.

Comment: Support for the positive language in proposed goal LU G12: “Develop transitions between industrial areas and adjacent neighborhoods that support healthy communities, reduce adverse environmental impacts, and minimize land use conflicts.” Recommend new goal about housing in industrial zones.

Response: The Commission’s letter will recommend appropriate language similar to that above referencing healthy communities and reducing environmental impacts.

Re: **LU 10.1722** ~~Establish the industrial buffer~~ Consider using the urban industrial or industrial buffer zones to provide an appropriate transition between industrial areas and adjacent residential or pedestrian-oriented commercial zones.

Question: Why has “establish a buffer” been struck and “consider using...” added? This sounds less prescriptive. Concern with how the proposed amendments would affect the unique nature of existing buffer zones between industrial areas and other uses.

Response: The proposed wording has been reviewed by the City’s Law Department. The urban industrial zone is the new designation for buffer areas between industrial lands and other uses. The industrial buffer zone will be maintained temporarily until the zoning code is cleaned up.

Question: Is there a goal that has been added or language that has been strengthened regarding tribal access and rights?

Response: No. Tribal issues are governed by Federal regulations. The City has sought input from local tribes throughout this process.

Staff Draft Letter Outline

1. Introduction
2. Equity and Environmental Justice
3. Land Use Element
4. Transportation
5. Climate Change/Resiliency
6. Shoreline Areas
7. Cultural Resources

Equity and Environmental Justice

SPC recommends that implementation of the Industrial and Maritime Strategy must ensure that any zoning proposals move to repair the harms of the past and benefit affected communities through both public and private investment.

Implementation must also consider potential displacement pressures and identify anti-displacement measures and incentives.

Equity and Environmental Justice

SPC strongly supports the positive language in proposed Comprehensive Plan goal **LU G12**: “Develop transitions between industrial areas and adjacent neighborhoods that support healthy communities, reduce adverse environmental impacts, and minimize land use conflicts.”

We recommend incorporating similar language in a new or revised goal related to residential uses in industrial zones.

Land Use Element

SPC strongly supports the proposed policy to strengthen protections for industrially zoned lands:

LU 10.3 Ensure predictability and permanence for industrial activities in industrial areas by limiting changes in industrial land use designation. There should be no reclassification of industrial land to a non-industrial land use category or amendments to the boundaries of manufacturing industrial centers except as part of a City-initiated comprehensive study and review of industrial land use policies or as part of a major update to the Comprehensive Plan.

Land Use Element

SPC supports the addition of proposed policy LU 10.7, which would transition existing industrial lands to the following three new zones

- Maritime, Manufacturing and Logistics (MML)
- Industry and Innovation (II)
- Urban Industrial (UI)

II and UI zones “Support employment-dense emerging industries that require greater flexibility in the range of on-site uses and activities.” (Proposed Goal LU G11)

Land Use Element - Policies

SPC supports the intent and language of the following proposed policies establishing the II zones:

- **LU 10.19** In the industry and innovation zone, consider development regulations that are compatible with employment-dense transit-oriented development. Seek to establish development standards that ensure employment density at a level necessary to leverage transit investments.

Land Use Element

- **LU 10.20** In the Industry and Innovation zone, consider development standards that promotes development that meets the needs of industrial businesses including loadbearing floors, freight elevators, and adequate freight facilities.
- **LU 10.21** In the industry and innovation zone, consider an incentive system whereby nonindustrial floor area may be included in a development as a bonus if new bona-fide industrial space is included.

Land Use Element

SPC supports establishment of the Urban Industrial zone as a means of locating makerspaces, creative uses, and other light industrial uses in buffer areas between industrial areas and people-oriented neighborhoods.

- **LU 10.1722** ~~Establish the industrial buffer~~ Consider using the urban industrial or industrial buffer zones to provide an appropriate transition between industrial areas and adjacent residential or pedestrian-oriented commercial zones.

Land Use Element

SPC supports the intent and language of the following proposed policies establishing the UI zones:

LU 10.23 In the urban industrial zone, consider allowing a range of ancillary nonindustrial uses. Recognize that industrial businesses in this zone have a greater need for a limited amount of space for such uses as tasting rooms and retail facilities that directly support the industrial activity of the business.

LU 10.24 In the urban industrial zone, consider establishing buffer standards to ease the transition from industrial areas to urban villages and other non-industrial parts of Seattle.

Land Use Element

SPC agrees with the following proposed policy revision:

LU 10.911... Consider using the urban industrial zone in locations within or outside urban centers or villages that borders a manufacturing/industrial center to help provide an appropriate transition and promote complimentary land use patterns between industrial and non-industrial activities.

SPC has also consistently advocated for allowing makerspaces and other creative uses in non-industrial neighborhoods, urban villages, and mixed-use zones. Recommend recognizing the potential for these types of uses in areas outside of Urban Industrial zones.

Land Use Element - Policies

SPC strongly commends the long-awaited solution to remove existing zoning loopholes that have allowed significant non-industrial development within industrially zoned lands.

LU 10.1012 Limit the density of development for nonindustrial uses in the manufacturing/industrial centers... Permit a limited amount of stand-alone commercial uses in industrial areas as workforce amenities. ~~or only if they reinforce the industrial character, and~~ Strictly limit the size of office and retail uses not associated with industrial uses, in order to preserve these areas for industrial development, except for areas eligible for the Industry and Innovation zone.

Land Use Element

SPC has reviewed the proposed revision to the existing policy related to housing in industrial zones.

LU 10.68 Prohibit new residential development in industrial zones, except for certain types of dwellings, such as caretaker units or, potentially in urban industrial zones, dwellings targeted to workers that are related to the industrial area and that would not restrict or disrupt industrial activity.

We understand the City would establish an appropriate vehicle for affirmative marketing and targeted outreach to local workers that may be interested in new industry-supportive residential units.

Land Use Element

SPC has consistently voiced our ongoing concerns related to the environmental health impacts of housing in proximity to industrial and maritime uses.

We encourage the City to be more explicit in recognizing the legacy of environmental injustice related to locating housing in or adjacent to industrial areas that has had disproportionate impacts on low-income and BIPOC populations.

Transportation

SPC has not seen any proposed Comprehensive Plan amendments related to transportation recommendations of the Industrial and Maritime Strategy.

We recommend either addition of new policies or revisions to existing policies in the Comprehensive Plan's Transportation element to address the following issues.

- Freight mobility and access for workers
- Reducing conflicts between freight traffic and other modes
- Prioritizing walking and biking facilities in industrial areas, especially around future light rail stations

Climate Change/Resiliency

SPC has not seen any proposed Comprehensive Plan amendments that would address the relationship between the Industrial and Maritime Strategy and climate change.

We recommend either addition of new policies or revisions to existing policies to address issues such as the impacts of sea level rise on key industrial and maritime lands.

Policy language should consider the impacts of adding density to these areas.

Shoreline Areas Element

The Shoreline Areas element contains land use policies for industrial land adjacent to Seattle's shorelines. These policies are implemented through the Shoreline Master Program.

SPC encourages adding or revising policy language encouraging restoration of lands and shorelines with industrial contamination to reduce public health concerns.

Cultural Resources

The Planning Commission has not seen any proposed policy language regarding tribal access and rights in implementation of the Industrial and Maritime Strategy.

We understand the City has sought input from local tribes during the development of the recommendations.

SPC suggests ongoing consultation with potentially affected tribes to identify industrial uses that could create physical or economic impacts to tribal fisheries, natural or cultural resources.

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