

(Date)

Honorable Councilmember Dan Strauss, Chair  
Land Use Committee  
*via e-mail*

RE: 2023 Comprehensive Plan Amendment Recommendations

Dear Councilmember Strauss,

The Seattle Planning Commission is pleased to provide our comments and recommendations on the proposed 2023 Comprehensive Plan amendments to be adopted as part of the annual update process. Providing recommendations on annual Comprehensive Plan proposals is a mandate of the Commission and a responsibility we are pleased to fulfill as stewards of Seattle's Comprehensive Plan. This letter provides specific comments and recommendations on the proposed amendments that would implement the City's recently completed Industrial and Maritime Strategy.

The Planning Commission has eagerly followed development of the Industrial and Maritime Strategy over the past several years. The Commission provided comments during the development of the final recommendations by the Citywide and Neighborhood Advisory Groups and submitted a detailed comment letter on the Draft Environmental Impact Statement in February 2022. We applaud the Office of Planning and Community Development and the diverse group of committed stakeholders for developing a robust set of policy recommendations to guide the future of Seattle's industrial and maritime lands. Evolving Seattle's approach to industrial lands in the One Seattle Comprehensive Plan will serve as a critical tool for the City to reach its employment targets, as well as its climate resiliency and environmental sustainability goals.

### **Equity and Environmental Justice**

The Planning Commission applauds inclusion of an equity and environmental justice lens throughout development of the Industrial and Maritime Strategy. Seattle's industrial and maritime history and other land use policies throughout the city have perpetuated a legacy of institutionalized racism and environmental injustice, especially in low-income and BIPOC communities. A key opportunity through review and approval of current proposed amendments to the Comprehensive Plan, as well as ongoing planning efforts, is to recognize and address the legacy of health hazards such as air pollution, contamination, and noise to residents and workers in impacted communities such as South Park and Georgetown. The Commission recommends that implementation of the Industrial and Maritime Strategy ensure that any zoning proposals, development regulations, and other related policy actions move to both repair the harms of the past and address current and potential future harms to those affected communities through public and private investment. Implementation must also mitigate potential displacement pressures and invest in anti-displacement measures.

## Land Use Element

### *Protecting Industrial Lands*

The Planning Commission has historically been supportive of policies and plans that protect Seattle's industrial and maritime lands and the jobs that are created within those sectors. Overarching themes of previous Planning Commission recommendations and independent work include the vital role industrial lands play in the local and regional economy, and the need for strong land use and zoning policies to protect industrial areas from non-industrial redevelopment. Over the years, the Commission has reviewed numerous proposed amendments through the annual Comprehensive Plan amendment process that would change industrial zoning and remove land from the Manufacturing/Industrial Centers (M/ICs). Therefore, we strongly support the following proposed Comprehensive Plan 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.

### *New Industrial Zones*

The Commission applauds the addition of proposed policy **LU 10.7**, which would transition existing industrial lands in Seattle to the following three new zones - Maritime, Manufacturing and Logistics (MML); Industry and Innovation (II); and Urban Industrial (UI). The MML zone is generally an updated designation of the existing Industrial General zones and recognizes the importance of Seattle's more traditional industrial and maritime activities with access to Port facilities, shipyards, freight rail, and shoreline access. The new II and UI zones, as proposed Comprehensive Plan goal **LU G11** states, "Support employment-dense emerging industries that require greater flexibility in the range of on-site uses and activities." These new zones represent the evolving future of industry and are intended to respond to issues, challenges, and opportunities for the maritime and industrial sectors and adjacent communities.

- *Industry and Innovation:* The Planning Commission supports the creation of II zoning as an innovative approach for determining a mix of uses in the walksheds around future light rail stations in industrial areas that optimizes the light rail investments without diminishing the functionality and viability of surrounding and/or adjacent industrial and maritime lands. Of the fourteen planned stations along Sound Transit's current preferred alignment of the West Seattle and Ballard Link Extensions project, six are either within industrial zones or capture a significant amount of industrial zoned land within their walksheds.

We agree with 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.

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.

The Planning Commission has reviewed the proposed revision to the following existing policy related to parking and loading requirements in industrial zones. We recommend more definitive language than “Consider limiting...” such as ‘Limit parking in the industry and innovation zone...’

LU 10.4214 Set parking and loading requirements in industrial zones to provide adequate parking and loading facilities to support business activity, promote air quality, encourage efficient use of the land in industrial areas, discourage underused parking facilities, and maintain adequate traffic safety and circulation. Allow some on-street loading and occasional spillover parking. Consider limiting parking in the industry and innovation zone located in the vicinity of high-capacity transit stations.

As these zones are located around the future light rail stations and are intended to leverage significant transit investments, the City should discourage parking of non-industrial vehicles and encourage workers to use alternatives such as walking, biking, and other non-motorized modes.

- *Urban Industrial:* We also support 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. The Planning Commission 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. See our comments about housing below for more information and context.

We have reviewed the proposed revision to the following policy, and recommend more prescriptive language than “Consider using...” such as ‘Use the urban industrial ....’

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.

We understand that this proposed wording has been reviewed by the City's Law Department and will be maintained until new zoning designations are adopted. Reference to the industrial buffer zone will likely be removed after the zoning code is revised for consistency across plans and codes.

We agree with 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.

We agree 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.

However, the Planning Commission has consistently advocated for allowing makerspaces and other creative uses in non-industrial neighborhoods in our current urban villages and mixed-use zones. We recommend recognizing the potential for these types of uses in areas outside of Urban Industrial zones in additional future policy and zoning proposals.

#### *Restricting Non-Industrial Uses*

The Planning Commission strongly commends the long-awaited solution to remove existing zoning loopholes that have allowed significant non-industrial development within industrially zoned lands, especially auto-dependent uses such as big box stores, storage facilities, strip commercial development, and surface parking lots. For example, the southern portion of the Ballard/Interbay/Northend M/IC has seen a significant amount of development in recent years including big box stores, storage facilities, and other auto-dependent commercial uses. The following proposed policy revision would lay the foundation for tightening limits on these types of non-industrial development that have been allowed in the past.

**LU 10.4012** 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.

## *Housing*

Implementation of the Industrial and Maritime Strategy will result in broad impacts on housing citywide and throughout the region resulting from increased employment growth. The City must address the housing needs associated with significant expansion of industrial and maritime jobs, especially as many skilled workers may need to commute long distances to jobs without access to affordable worker-supportive housing. The Planning Commission strongly supports adding capacity for housing in urban villages and other residential zones with fast access to areas expected to have significant job growth. This should include a range of housing types and affordability levels to accommodate a variety of workforce income categories.

The Industrial and Maritime Strategy's final recommendations would add capacity for approximately 3,000 units of new housing, focusing on workforce/middle-income housing. About half of these units would be located outside of the M/ICs in new mixed-use areas like Judkins Park, Ballard and Georgetown, while the other half of these units would be in Urban Industrial zones as a conditional use with a workforce housing requirement to support industry-related workers. While the Planning Commission supports increasing housing choice throughout residential areas of the city, we remain concerned about providing housing options in industrial areas, especially because those most likely to live in units targeted to industry-related workers will be cost-burdened low-income households or moderate-income households who cannot afford housing options elsewhere in the city. This would result in perpetuating environmental injustice issues and ensuring the residents in these communities lack access to neighborhood amenities and opportunity that all Seattleites, no matter their income, deserve. We understand that the time to debate this issue has passed and offer our comments below in hopes of improving implementation of this policy.

The Planning Commission has reviewed the proposed revision to the existing policy related to housing in industrial zones. We have concerns with the language "targeted to workers..." below and would prefer language such as "intended for workers..." to reinforce the intent of the policy.

**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 that the proposed wording has been reviewed by the City's Law Department. 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 consistent with the Federal Fair Housing Act.

The Planning Commission has consistently voiced our ongoing concerns related to the environmental health impacts of housing in proximity to air quality and noise emissions from industrial and maritime uses. We encourage the City to be more explicit in acknowledging and addressing the historic and

ongoing environmental injustice related to locating housing in or adjacent to industrial areas that has had disproportionate impacts on low-income and BIPOC populations. We recommend the City consider the public health risks of industry-supportive residential uses through an environmental justice lens by identifying and mitigating any potential air quality, heat island, contamination, and noise impacts on future residential uses in or near industrial areas.

#### *Master Planning for WOSCA and Armory Sites*

The Planning Commission agrees with the intent of the following new policy related to master planning for the WOSCA and Armory sites:

**LU 10.25** Recognize the unique development opportunities that the Washington National Guard Armory in the BINMIC and the WOSCA (Washington Oregon Shippers Cooperative Association) represents. Work with the State of Washington or other future owners of this site to develop a comprehensive industrial development plan. This plan should include green infrastructure, consolidated waste management programs, and workforce equity commitments.

We have not been briefed in recent years on any development plans for the WOSCA site specifically. We look forward to learning more about this site as the master planning process evolves. The Commission followed the recent stakeholder advisory committee process for the future of the Interbay Armory site currently owned by the State. Sound Transit's Ballard Link Extension project proposes to locate two future light rail stations in Interbay less than a mile apart. The Armory site is within the watershed of both future light rail stations. The Planning Commission will review station area plans for these stations and will pay particular attention to any plans for the Armory site.

#### **Transportation**

The Planning Commission has not seen any proposed Comprehensive Plan amendments related to transportation recommendations of the Industrial and Maritime Strategy. Seattle's transportation system will be significantly affected by the evolution of our industrial and maritime areas. We recommend addition of new policies or revisions to existing policies in the Comprehensive Plan's Transportation element and the forthcoming Seattle Transportation Plan to address the following issues.

Freight mobility and access for workers are issues of critical importance for successful economic development. Traffic volumes and travel times for both autos and freight would increase due to growth within the industrial zones. The Planning Commission recommends a review of existing transportation policies related to freight mobility and logistics. We recommend the City's Department of Transportation work with private industry stakeholders and organizations such as the University of Washington's Urban Freight Lab to address issues related to the proliferation of smaller delivery vehicles and the need for dedicated loading zones, curb space, and/or parking.

As a result of more intensive development in Seattle's industrial areas, more people will be walking, biking, and riding transit in parts of the city with incomplete networks. The Planning Commission recommends a transportation policy aimed at reducing conflicts between freight traffic and other modes such as pedestrians and bikes in communities without sufficient non-motorized infrastructure.

The City should continue to make important investments in and enhancements to quality multi-modal access, connections, and infrastructure including sidewalks, transit access, bike lanes, and trails that get workers to their jobs. The hundreds of workers needing to access future employment centers located within industrial and maritime areas deserve significant multi-modal improvements that both improve the speed and ease of their transportation options while relieving car congestion on our streets. The Planning Commission recommends policy language prioritizing walking and biking connections in industrial areas in a thoughtful manner that both completes these missing links while minimizing conflicts with freight and other motorized traffic. Examples include investments in sidewalks, bikeshare, motorized vehicle speed reduction and/or lane separators along highly trafficked pedestrian and bicycle routes, and last mile connections, especially around future light rail stations.

### **Climate Change/Resiliency**

The Planning Commission understands that the One Seattle Comprehensive Plan may include a new element related to climate change and resiliency. We have not seen any proposed Comprehensive Plan amendments at this time that would address the relationship between the Industrial and Maritime Strategy and climate change or resiliency. We recommend either addition of new policies or revisions to existing policies to address these important issues. For example, the Planning Commission recognizes the severity of the potential impacts of sea level rise and the heat island effect on key industrial and maritime lands, including specific areas of SODO, South Park, Ballard, and Interbay. Policy language should consider the impacts of adding density to these areas.

### **Shoreline Areas**

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 which designates which shorelines are industrial in use and establishes development regulations for those uses within 200-feet of Shorelines of the State. The Planning Commission encourages a concurrent evaluation of the City's Shoreline Master Program's effectiveness in maritime and industrial areas to strengthen protection of currently undeveloped shorelines and to promote incentive strategies to improve water quality treatment and flood resiliency for both existing and future development. The City should add or revise policy language encouraging restoration of lands and shorelines with industrial contamination to reduce public health concerns, including contaminants in fish from waterways adjacent to industrial areas, especially within the watershed of Urban Industrial areas where limited housing will be permitted.

## 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. The Commission strongly suggests ongoing consultation with potentially affected tribes to identify areas of cultural significance and industrial uses that could create physical or economic impacts to tribal fisheries, natural, or cultural resources. In cases where the City cannot prevent unavoidable new or continued impacts of industrial uses or other practices that block the legally protected rights of these tribes to fishing or harvesting at their usual and accustomed grounds, we recommend that the City develop and adopt a policy framework for meaningful mitigation strategies in direct collaboration with affected tribes. We recommend explicit recognition of impacts to the cultural and historic importance of indigenous land, including the ancestral lands of the Duwamish, Suquamish, and Muckleshoot Tribes.

We appreciate the opportunity to provide our comments on the proposed Industrial and Maritime Strategy Comprehensive Plan amendments. If you have any questions, please do not hesitate to contact Vanessa Murdock, Seattle Planning Commission Executive Director.

Sincerely,

McCaela Daffern and David Goldberg  
Co-Chairs, Seattle Planning Commission