

August 9, 2021

Seattle Office of Planning and Community Development
c/o Jim Holmes

To Whom It May Concern:

On behalf of NAIOP Commercial Real Estate Development Washington State (“NAIOP”) and our industrial, office and residential property owner / developer members, this letter provides scoping comments as part of the City of Seattle’s 2021 Industrial and Maritime Strategy’s upcoming Environmental Impact Statement (EIS) process.

NAIOP and our members have been deeply involved in policy conversations around the future of Seattle’s industrial lands for decades. We continue to support the City’s commitment to protecting our working waterfront and the core industrial lands that are vital to protecting family-wage jobs and the efficient flow of freight and cargo goods in and out of our region.

That said, we do not believe all 5,000 acres of our City’s industrial lands should be treated the same. We applaud OPCD staff for evaluating a range of possible uses in areas that are no longer in “core” industrial use, especially near transit areas. New policy direction included in the Industrial and Maritime Strategy would strengthen the market for new light industrial jobs, as well as adding high-density employment near transit stations, if the project includes industrial uses in the same project.

We believe in some areas, this work could go further, and our request is for the following topics to be analyzed as part of the EIS process, ensuring that this effort fully considers the billion-dollar taxpayer investment in current and future light-rail transit stations that fall within this study area.

Our recommendations include:

- Expanding study of the Seattle Mixed zone in Interbay (including the Armory site), Ballard and areas of SODO within a ¼ mile of an existing or future transit station.
- Exclude adoption of the current Comprehensive Plan Amendment that would prohibit removal of land within the MIC or BINMIC until the 10-year Comprehensive Plan update process. There has not been adequate discussion or public vetting of this very restrictive policy among impacted parties and it is also unclear how removing this much land from any future non-industrial use would impact long-term housing supply and affordability.
- Include a modern definition of “industrial” uses, to ensure that the opportunity for adding employment near transit stations, if industrial uses are included in the same project, attracts businesses that are part of today’s evolving industrial workforce.

Thank you for the opportunity to provide these comments to the City of Seattle's 2021 Industrial and Maritime Strategy's upcoming Environmental Impact Statement (EIS) process. We look forward to continuing to engage with you on these new policies as they move forward.

Sincerely,

Peggi Lewis Fu
Executive Director
NAIOP Washington State