



# City of Seattle

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August 3, 2007

Honorable Councilmember Steinbrueck, Chair  
Urban Development and Planning Committee  
Seattle City Council  
PO Box 34025  
Seattle, WA 98124-4025

### **RE: Request for Planning Commission Review of the Interbay Overlay Legislation**

Dear Councilmember Steinbrueck;

Thank you for asking for the Planning Commission's comments and assistance regarding the Interbay Overlay proposal (Chapter 23.75 Industrial Mixed Overlay District). As we understand it, the proposal would establish an overlay with regulations that are specific to this site including an industrial set-aside, a maximum allowance for certain non-industrial uses, a sequencing requirement of office development, and standards for office use not accessory to industrial use.

#### **Seattle Planning Commission General Comments:**

The Commission appreciates the Executive's effort to negotiate a creative solution for this particular site. We recognize that the Port has factored several unique challenges into this proposal. For instance; the site lacks desirable infrastructure and utilities, and access to and from the site is a challenge. In addition the Port has a settlement agreement with surrounding residential communities which puts restrictions on the types of activities and uses that can occur at this site (specifically the Port has committed to not developing container operations at this site). The current zoning for the site is IG1 and is located in the Ballard Interbay Northend Manufacturing and Industrial Center. Finally, there is a strong need to protect industrial, family-wage jobs in Seattle, such as the jobs provided by Korry Electronics and others. We encourage you to take these considerations into account as the Council considers potential adjustments to this proposal.

The Commission does not agree with the characterization of the proposal as preserving industrial land. The overlay effectively rezones a large part of the site for office uses while salvaging a portion of the land for industrial uses that are currently allowed by zoning across the entire site. The Port has indicated that the need for these new uses is driven by the cost of providing infrastructure while preserving competitive lease rates for industrial uses, as well as their desire to achieve targeted financial goals.

Under the current zoning of the site, office development is limited to the lesser of 50,000 square feet per parcel or the size of the parcel. Such small buildings are not generally

demanded in the current market for office space. The 50,000 square foot restriction in IG1 is intended to discourage large-scale, stand-alone office buildings from proliferating and compromising industrial areas by out-competing industrial uses. Consequently, the proposal, rather than preserving industrial land, opens it to non-industrial development on a scale that is, in effect, prohibited at present. While the overlay allows industrial uses throughout the site, it is unrealistic to assume these businesses will be able to compete for land with the non-industrial uses that would be allowed under the overlay. The Commission is concerned about the potential precedent this might set for other development proposals on industrial land.

### **Seattle Planning Commission Recommendations:**

While the Commission recognizes the hard work by the Port, the City and stakeholders to find an acceptable outcome for the Interbay site, the Commission is compelled to raise a number of considerations for city officials should the overlay move forward. We hope that the following comments will be carefully evaluated with the purpose of strengthening this proposal. We believe that the mitigation we have outlined would significantly strengthen the current proposal and should be included as additional components of the overlay.

#### ***1. Consistency with Seattle Comprehensive Plan and the Commission's recently released report, 'The Future of Seattle's Industrial Lands.'***

The Commission recommends that the Council view this proposal in light of current city policy and recognize that the City's decision on this proposal will likely influence any other similar large sites in Seattle that lack infrastructure.

The Commission has analyzed the proposal through the lens of the both the Seattle Comprehensive Plan and the Commission's recently released report, *The Future of Seattle's Industrial Lands*. This analysis can be found at the end of this document in Appendices One and Two. The analysis helps to pinpoint the Commission's concerns about the proposal and its potential effects on other City public policy goals and the proposal's consistency with both the Comp Plan and the Commission's report. We encourage the Council to strongly consider this analysis as you review the proposal.

#### ***2. Korry Electronics & Retaining Family Wage Jobs***

The Commission recommends that the City consider the approval of the overlay proposal and the need to accommodate Korry Electronics as separate issues.

We would like to note that the overlay is not required under current zoning in order for the Port to establish a lease with Korry. While the Planning Commission does not comment on specific pending lease negotiations as part of its regular practice, we strongly believe that retaining family wage industrial jobs is a vital interest for the city and an important public policy goal. We believe that industrial businesses like those at Korry Electronics are crucial to the economic health and vitality of Seattle. These types of industrial businesses have a long history of providing family wages jobs within the city. It is worth noting that businesses like Korry work well within the unique circumstances of this site.

We recognize that the proposal would allow the Port to lease land to Korry at a rate that is much more affordable for a traditional industrial business, and also allow the Port to make significant improvements to the site's transportation and utility infrastructure by gaining higher leases from non-industrial uses at the site. We want to ensure that other public policy goals are considered when reviewing the proposal. The decision will dramatically alter a significant portion of our city for many years to come, and must be viewed from a

variety of perspectives. We recommend that the Port and the City work together to make this site viable for the maximum amount of industrial use.

### ***3. Infrastructure Needs Impact on Industrial Land***

Maintaining industrial family wage jobs is an important civic asset and a public policy that is worth additional public investment. In order to preserve as much industrial land for industrial uses on the site as possible, we suggest that the Port and the City of Seattle work together to seek another solution for infrastructure rather than have the cost covered entirely by the development of this project.

The Port maintains that to develop the industrial parts of the site it needs to provide areas for high intensity office use in order to essentially subsidize the development of infrastructure for the whole site including the industrial use areas. This is a key consideration in the development of any larger industrial land development.

A major element in the infrastructure plan is the new bridge at the north end of the site to accommodate access over the train tracks to the site and beyond (including improving access to the mid Magnolia area). According to the Port's plan, this one infrastructure element consumes a major part of the proposed infrastructure development budget. Here again, we suggest that the City and the Port look for a financial solution and an infrastructure investment strategy that maintains industrial land for industrial uses.

### **Seattle Planning Commission Proposed Mitigation:**

If the City decides to move forward with this proposal we would like to suggest some changes and potential mitigation measures that could be implemented to best address the impacts of future development on the site.

#### ***1. Increase the Amount of the Industrial Set-Aside***

The Commission recognizes that the Port of Seattle has created a development proposal that is balanced between providing an adequate amount of industrial set-aside area while producing enough higher-revenue types of uses on the site (office, R&D and retail) to fund the necessary infrastructure improvements and meet their desired return requirements.

The Commission does, however, believe that a greater portion of the site could be devoted to industrial uses, and supports the City negotiating with the Port to achieve this. One potential scenario would be an extension of the industrial set-aside north to the border of the site. An expansion of the set-aside would more adequately address the recommendations made by the Commission in our report, *The Future of Seattle's Industrial Lands*. This report advocates for preserving all IG1-zoned industrial land and against allowing excessive amounts of retail and commercial uses in industrial zones. The Commission made these recommendations with the goal of preserving and fostering Seattle's thriving industrial sector. The preservation of more land devoted to industrial uses in the Interbay Overlay would assist the City in coming closer to achieving that goal.

#### ***2. Restrict the Parking Supply and Require that the Port Create a Transportation Management Plan***

Large-scale office development on the overlay site will produce a substantial increase in single-occupancy vehicle (SOV) trips to the area unless there is an aggressive effort to reduce the number of such trips. These trips may adversely impact the operations of nearby roadways, which may currently be near capacity in the PM peak hours. To establish an aggressive non-SOV mode split goal at the outset will help reduce the off-site transportation system impacts and may guide the development of parking supply on the site. The Commission recommends the Port take a proactive approach toward transportation demand management by

setting a commute trip reduction goal of 65 percent for the site. This goal will be a significant challenge, given the site's indirect connection to major transit routes on 15<sup>th</sup> Avenue NE. However, there are a variety of potential measures that could encourage and facilitate the use of alternative commute modes.

One of the most effective methods for achieving commute trip reduction goals is to limit the supply of on-site parking, and to charge for the use of those parking spaces. The Commission recommends providing on-site parking at a significantly reduced ratio from that of a typical suburban-style office campus. This action can not be done in the absence of measures that provide alternative commute options for employees.

Such measures include promoting commute trip reduction strategies, improving transportation system infrastructure, and enhancing access to transit service. The Port and employers at the Interbay site may promote commute options such as transit, car pools and van pools, and bicycling and walking. Providing a FlexPass for all employees would encourage transit use, and on-site FlexCar or other vehicles for employee use would provide a degree of mobility during the day. Employer incentives and flexibility that allow for off-peak commuting such as a compressed work week, flex time, and telecommute options should be considered. Ample on-site bicycle parking and convenient shower/locker facilities, plus convenient bicycle route connections would encourage bicycling.

A challenge for achieving a high level of transit use is creating convenient pedestrian connections between the major transit service on 15<sup>th</sup> Avenue West and the overlay site which is several blocks to the west of this transit corridor. Ample and attractive sidewalks would help, as would a shuttle service – similar to the shuttle to the Microsoft campus from the Overlake Park and Ride.

In addition, the Commission hopes to ensure that the cost of providing transportation infrastructure is not shifted elsewhere. We believe that the Port must take the initiative with local transit agencies to provide the necessary service to, from, and through the site. The Port must also establish infrastructure to ensure that transit service is accessible to overlay area employees. Approval of the first Master Use permit for non-industrial use within the overlay area should be conditioned on development of a plan for this service and infrastructure, and provisions for its financing.

### ***3. Create a Development Review Board as a Condition of Approval***

A Development Review Board could be convened to oversee and play an advisory and, possibly, an approval role during the development of the site. This board could include members of the Design Review Board with jurisdiction over the area, the Design Commission, and the Planning Commission as well as members from BINMIC or people with similar backgrounds and perspectives. The Board would review the development not just from a design perspective, but with broader planning goals in mind as well. The Development Review Board could operate in a manner similar to the current design review boards in the city and would remain in place throughout the development life of the project to ensure that proper development is pursued as the project is built out. We believe that the Port is interested in developing a quality project which sets a high design standard and the Board would be of great assistance in ensuring this goal.

### ***4. Strengthen the Green Building Standards***

While the current proposal laudably requires new development to achieve LEED certification, we believe that this development should be more forward-thinking and should be held to standards appropriate to the year 2030. We suggest also looking at other standards such as Standard 189, created by The American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE). Standard 189 is intended to provide those more far-reaching standards and could be considered as the standard for office and R&D uses within

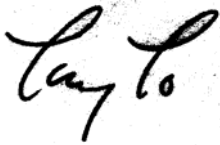
the overlay. There have been significant advances in developing green building standards for large scale site development including surface water management, bio friendly paving, solar site night lighting, green roofing, etc. In order to address the large amount of impervious surface on the site, we encourage that these developments be considered for buildings constructed on the site. We also recommend the City consider applying the Green Factor to this site and requiring a high ratio of green roofs for the development.

**5. Create More Appropriate Development Standards**

The Draft Northbay Development Standards are inadequate for the proposed development. All the images reflect low-density suburban office-park type development with surface parking. This type of development is not appropriate for this site or for the city of Seattle. While some of the development standards address the particular characteristics of this location, others are more generic in content. Development Standards that better address the proposed development are needed. In particular, standards which address non industrial buildings of higher densities (3.0 FAR versus less than 1.0 FAR for suburban office park), greater height, and the need for structured parking, are essential.

We would like to thank you for the opportunity to provide you with our analysis, perspective and recommendations with regard to City Council's review of the Interbay Overlay proposal (Chapter 23.75 Industrial Mixed Overlay District). The Planning Commission is an independent citizen volunteer advisory body that provides advice and recommendations to City officials on broad planning goals, policies and plans for the physical development of Seattle. The Planning Commission is made up of dedicated individuals who apply their collective knowledge and expertise when creating their advice. This collective knowledge includes background in land use law, neighborhood planning, environmental impact analysis, economic and community development, land use and transportation planning, affordable housing, architecture, real estate and civil engineering among others. Much of this experience has come to bear in the Commission's review of this proposal. We hope you find our analysis helpful in your decision-making process. We look forward to assisting you further in your review of the proposal.

Sincerely,



Tony To, Chair  
Seattle Planning Commission

CC:

Mayor Greg Nickels  
Seattle City Council  
John Creighton, Chair, Port of Seattle  
Deputy Mayor Tim Ceis  
Diane Sugimura, Director, DPD  
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Karen Kiest, Chair, Seattle Design Commission  
Patrick Doherty, Chair, Queen Anne/ Magnolia Design Review Board  
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**Appendix One: Planning Commission Analysis: Consistency with Seattle's Comprehensive Plan**

In reviewing the Interbay Overlay proposal, the Commission felt that as the stewards of the Comprehensive Plan, it was imperative to first review the Comprehensive Plan language relevant to the proposal. For a complete listing of the language the Commission considered relevant, please see *Table 1*. Below is Comprehensive Plan language we considered most relevant to the proposal.

Urban Village Element, pg. 1.18, 'Manufacturing and Industrial Centers Policy'

**UV24** Limit in manufacturing/industrial areas those commercial or residential uses that are unrelated to the industrial function, that occur at intensities posing short- and long-term conflicts for industrial uses, or that threaten to convert significant amounts of industrial land to non-industrial uses.

**Commission comments:** The overlay is located in a Manufacturing and Industrial Center. The overlay does not alter the existing limit on residential uses. It strengthens the existing cap on retail uses unrelated to industrial functions. However, the existing cap on office uses would effectively be eliminated by allowing "clustering", thus office uses will compete for land with industrial uses and are expected to pay higher rents. This competition for land would result in the conversion of significant amounts of industrial land to non-industrial uses. In addition, there could be conflicts with industrial uses, especially in regard to traffic that, if unmitigated, could pose short- and long-term impacts for industrial uses.

Land Use Element, pgs. 2.25-2.29, 'Industrial Areas'

**LUG24** Preserve industrial land for industrial uses and protect viable marine and rail-related industries from competing with non-industrial uses for scarce industrial land. Give special attention to preserving industrial land adjacent to rail or water-dependent transportation facilities.

**LUG27** Restrict or prohibit uses that may negatively affect the availability of land for industrial activity, or that conflict with the character and function of industrial areas.

**Commission comments:** While the overlay does preserve some industrial land for industrial uses, it also converts two thirds of a 99 acre site to non-industrial use. This overlay will 'negatively affect the availability of land for industrial activity,' and the new office uses will likely 'conflict with the character and function of industrial areas' by increasing the scale and density of office uses beyond that typically found in industrial areas, and increasing the demands on the limited roadway network in the area. In addition, the office uses would not make use of either the marine or rail access to this area.

Transportation Element, pgs. 3.13-3.14, 'Promoting the Economy: Moving Goods and Services'

**T48** Recognize the importance of the freight network to the city's economic health when making decisions that affect Major Truck streets as well as other parts of the region's roadway system.

**Commission comments:** The overlay site is in close proximity to and dependent on 15<sup>th</sup> Avenue West and Elliott Avenue West, the restricted Ballard Bridge, and on the Mercer corridor for access to I-5. These are Major Truck streets. Without mitigation, the substantial influx of office workers from the proposed office build out at the site and consequent single occupancy vehicle trips to the area will likely cause significant congestion on these streets and adjacent neighborhoods, restricting freight mobility to and from the site and its surrounding areas. The Commission is concerned that seriously compromising the level of freight mobility on these Major Truck streets without significant infrastructure improvements does not ‘recognize the importance of the freight network to the city’s economic health.’ The commission recognizes that the EIS identified mitigation, but to our knowledge there has been no proposed mitigation directly linked to the overlay proposal. In the event the capacity of the AWW and future corridor is reduced, this limitation on SR99 will dramatically increase the pressure and congestion on these streets as well.

Neighborhood Planning Element, pgs. 8.15-8.19, ‘BINMIC’

**BI-P2** Preserve land in the BINMIC for industrial activities such as manufacturing, warehousing, marine uses, transportation, utilities, construction and services to businesses.

**BI-P6** Strive to provide infrastructure in the BINMIC that is sufficient to ensure the efficient operation and smooth flow of goods to, through and from the BINMIC. Infrastructure includes publicly built and maintained roads, arterials, utilities, moorage facilities and other capital investments by the City, Port, County, State and Federal agencies.

**BI-P12** Within the BINMIC, water-dependent and industrial uses shall be the highest priority use.

**Commission Comments:** Because the overlay only preserves one third of a 99 acre parcel for industrial land, the Commission is concerned it conflicts with BINMIC’s neighborhood plan, which urges the ‘preservation of land in the BINMIC for industrial activities.’ The Commission is also concerned the overlay does not treat industrial uses as ‘the highest priority use.’ Finally, in terms of transportation infrastructure, the Commission is concerned the proposal does not adequately address the neighborhood planning goal of striving to ‘provide infrastructure to the BINMIC that is sufficient to ensure efficient operation and smooth flow of goods to, through and from the BINMIC.’ As mentioned above, we are concerned that without mitigation, the substantial influx of office workers and consequent single occupancy vehicle trips to the area will undermine freight mobility in the area and cause congestion. Without adequate transportation infrastructure improvements, this congestion would slow the flow of goods to, through and from BINMIC.

The Commission recognizes Comprehensive Plan language exists that would tend to support the Interbay Overlay. In particular, BI-P26 and BI-P28 (see Table One) offer policies in accordance with the proposal. However, the Commission attempted to take an overarching view of all the Comprehensive Plan language relevant to the site, and this perspective is reflected in this analysis.

***Table 1. Comprehensive List of Comp Plan amendments relevant to the Interbay Overlay Proposal***

**Urban Village Element, pg. 1.18, 'Manufacturing and Industrial Centers Policy'**

**UVG4** Promote densities, mixes of uses, and transportation improvements that support walking and use of public transportation, especially within urban centers and urban villages

**UVG5** Direct the greatest share of future development to centers and urban villages and reduce the potential for dispersed growth along arterials and in other areas not conducive to walking, transit use, and cohesive community development

**UV21** Promote manufacturing and industrial employment growth, including manufacturing uses, advanced technology industries, and a wide range of industrial-related commercial functions, such as warehouse and distribution activities, in manufacturing/industrial centers.

**UV22** Strive to retain and expand existing manufacturing and industrial activity.

**UV23** Maintain land that uniquely accessible to water, rail, and regional highways for continued industrial use.

**UV24** Limit in manufacturing/industrial areas those commercial or residential uses that are unrelated to the industrial function, that occur at intensities posing short- and long-term conflicts for industrial uses, or that threaten to convert significant amounts of industrial land to non-industrial uses.

**Land Use Element, pgs. 2.25-2.29, 'Industrial Areas'**

**LUG23** Accommodate the expansion of existing businesses within Seattle, thereby stabilizing the city's existing industrial areas. Promote opportunities for new businesses that are supportive of the goals of industrial areas.

**LUG24** Preserve industrial land for industrial uses and protect viable marine and rail-related industries from competing with non-industrial uses for scarce industrial land. Give special attention to preserving industrial land adjacent to rail or water-dependent transportation facilities.

**LUG25** Promote high-value-added economic development by supporting growth in the industrial and manufacturing employment base.

**LUG26** Give adequate attention to the needs of industrial activity while reducing major land use conflicts between industrial development and abutting residential or pedestrian-oriented commercial areas, and avoid placing unnecessary restrictions on manufacturing uses.

**LUG27** Restrict or prohibit uses that may negatively affect the availability of land for industrial activity, or that conflict with the character and function of industrial areas.

**LUG28** Prevent incompatible activities from locating in close proximity to each other.

**LUG29** Accommodate a mix of diverse, yet compatible, employment activities in Seattle's industrial areas

**LU141** Consider manufacturing uses, advanced technology industries and a wide range of industrial-related commercial functions, such as warehouse and distribution activities, appropriate for industrial areas.

**LU142** Consider high value-added, living wage industrial activities to be a high priority.

**LU143** Permit commercial uses in industrial areas to the extent that they reinforce the industrial character, and limit specified non-industrial uses, including office and retail development, in order to preserve these areas for industrial development.

**LU160** Prohibit certain uses to preserve land for industrial activity or to minimize conflicts that may occur between the use and industrial activity because the use attracts large numbers of people to the area for non-industrial purposes, or because the use would be incompatible with typical industrial area impacts (noise, truck movement, etc.)



**Transportation Element, pgs. 3.13-3.14, 'Promoting the Economy: Moving Goods and Services'**

**T4** Provide sufficient transportation facilities and services to promote and accommodate the growth this Plan anticipates in urban centers, urban villages, and manufacturing/industrial centers while reducing reliance on single occupancy vehicles

**TG19** Preserve and improve mobility and access for the transport of goods and services.

**T48** Recognize the importance of the freight network to the city's economic health when making decisions that affect Major Truck streets as well as other parts of the region's roadway system.

**T50** Promote an intermodal freight transportation strategy, including rail, truck, air and water transport and advocate for improved freight and goods movement. Work toward improved multi-modal connections among rail yards, industrial areas, airports, and regional roadways.

**Economic Development Element, pg 7.3, 'Economic Development and the Urban Village Strategy'**

**EDG3** Support the Urban Village Strategy by encouraging the growth of jobs in Urban Centers and Hub Urban Villages and by promoting the health of neighborhood commercial districts

**Neighborhood Planning Element, pgs. 8.15-8.19, 'BINMIC'**

**BI-P2** Preserve land in the BINMIC for industrial activities such as manufacturing, warehousing, marine uses, transportation, utilities, construction and services to businesses.

**BI-P3** Retain existing businesses within the BINMIC and promote their expansion.

**BI-P4** Attract new businesses to the BINMIC.

**BI-P5** Recognize that industrial businesses in the BINMIC have the right to enjoy the lawful and beneficial uses of their property.

**BI-P6** Strive to provide infrastructure in the BINMIC that is sufficient to ensure the efficient operation and smooth flow of goods to, through and from the BINMIC. Infrastructure includes publicly built and maintained roads, arterials, utilities, moorage facilities and other capital investments by the City, Port, County, State and Federal agencies.

**BI-P8** Maintain the BINMIC as an industrial area and work for ways that subareas within the BINMIC can be better utilized for marine/fishing, high tech, or small manufacturing industrial activities.

**BI-P12** Within the BINMIC, water-dependent and industrial uses shall be the highest priority use.

**BI-G1** Strive to improve industrial traffic flow to and through the BINMIC.

**BI-G2** Facilitate truck mobility.

**BI-G10** In order to preserve freight mobility: strive to preserve and improve turning radii, visibility and sight lines, clearance and existing lane configuration of streets within the BINMIC; and consider impacts on BINMIC of changes to arterial access routes to the BINMIC.

**BI-P15** Support preservation of all streets within the BINMIC and arterial access routes to the BINMIC for freight mobility. To accomplish this, support preservation of turning radii, visibility and sight lines, clearance and existing lane configurations.

**BI-P26** Strive to provide opportunities for industrial reuse of vacant governmentally owned property within the BINMIC.

**BI-P28** Strive to develop creative financing mechanisms, including public-private partnerships, for upgrading utilities and infrastructure.

**Appendix Two: Consistency with SPC's Future of Seattle's Industrial Lands Report**

In the Commission's July 2, 2007 report titled *The Futures of Seattle's Industrial Lands* we make several strong statements and recommendations to the City regarding the treatment of industrial zoning. We wish to provide those recommendations we consider most relevant to the Interbay Overlay proposal.

First and foremost, the Commission's report recognizes that "*Industrial zoned land is a vital civic asset. Because Seattle's industrial businesses are critical to our city's overall economic health and global competitiveness the City should strengthen its industrial policies. The retention of industrial land contributes significantly to Seattle's family wage job base, provides significant tax revenue to the city and is essential in providing stability to our economy.*"

Below please find additional recommendations from the Commission's report that are relevant to the proposal, organized by subject area.

**Zoning:**

- The allowance of excessive amounts of retail and commercial uses in industrial zones has compromised the integrity of Seattle's industrial base. We recommend that the City significantly restrict the amount of retail and commercial uses that are allowed in industrial zoned areas. Small retail uses are important to the functioning of the industrial areas; by limiting the size of these uses, we expect that new retail uses will be those that primarily support the industrial area. These size limitations may vary between IG and IC zones, such as creating stricter size limitations in IG zones than in IC zones, to best foster the intended uses for each zone.
- Seattle should tighten its land use practices by putting limits on conditional uses and special purpose overlays that change the nature of industrial areas. Contract rezones should be severely limited and only allowed in special circumstances when there is a well-documented public policy rationale for doing so. The city should outline clear and understandable criteria for meeting a high threshold. In order to provide certainty and stability to the industrial areas, the City should refrain from entertaining requests to rezone major portions of industrial land. The City should carefully and clearly define what constitutes an industrial use in order to provide more clarity for land owners, potential developers and new businesses that may want to locate in Seattle.
- The City should treat land in Seattle's MIC as an area that requires additional sanctuary from uses that degrade and compromise industrial uses. Seattle should consider applying some of the strategies used by cities regarding 'industrial sanctuaries' to Seattle's MICs.
- In order to preserve and foster Seattle's industrial businesses, the city should not reduce the geographic area of its General Industrial 1 (IG1) and General Industrial 2 (IG2) zones. It should reexamine the land use code restrictions in these zones, however, in the manner documented below. Industrial Commercial (IC) may need some adjustment, both in terms of geographic area and land use code restrictions. When examining IC zones, the City should look again at the constraints in these zones to ensure the City's policies regarding retail and office uses are focused on creating employment centers. The City should ensure enough flexibility exists to foster employment centers that can exist and thrive in IC zones.

*Jobs and Economy:*

- The city should continue to track wage and employment information regarding industrial jobs to determine if industrial policies are working to preserve family-wage jobs, including jobs that do not require a college education.
- Seattle is an important seaport for international trade and cargo shipping. This sector of Seattle's economy is vital and should be specifically protected from uses that will negatively impact the efficient movement of freight and Seattle's competitiveness in the global economy.

*Transportation:*

- The City should create an industrial infrastructure strategy to accompany the Industrial Lands Strategy that will build on the industrial needs and focus of the industrial areas.
- Investment in transportation infrastructure that supports industrial business and its workforce is essential. As jobs and housing growth continues, the transportation network is becoming more constrained. Freight mobility and the movement of cargo should be a significant priority in local and regional transportation investments. Single occupancy vehicle trips through and to the industrial areas should be discouraged. Transportation agencies should work closely with major employers to take advantage of existing public transit amenities that serve the worker in these areas to minimize the adverse impacts of increased traffic in industrial areas.

*Research and Development Uses:*

- The City should examine the current capacity for research and development (R&D) businesses in land currently zoned Commercial, Seattle Mixed, and Industrial Commercial before rezoning lands to accommodate these uses. Sufficient capacity may already exist for these businesses, and creating new land for these uses may not be necessary.
- The City should clearly articulate the difference between R&D that has a valid and compelling need to be located in an industrial area versus those that act more as a typical office use. Only R&D that has a clear and compelling reason to be in industrial areas should be permitted and should be focused in land zoned IC.
- The City should specifically consider where best to accommodate the needs of 'cleaner and quieter' industrial businesses such as high tech R&D and biotech. High tech R&D and other 'new' industrial businesses are currently allowed in land zoned Commercial, Seattle Mixed, and Industrial Commercial where infrastructure exists and conflicts with other industrial users can be minimized.
- After examining current capacity, the City could consider allowing greater flexibility including density, Floor Area Ratio and heights in areas currently zoned IC, Seattle Mixed or Commercial to accommodate the different needs of the 'cleaner and quieter' industrial businesses that have a specific need to be in industrial zoning.