### B.6 Letters Regarding Limitations on Industrial Lands

#### Introduction

Appendix B.6 contains letters received during the comment period for the Draft EIS regarding limitations on certain types of industrial land designation actions in Manufacturing and Industrial Centers. These are not further responded to in this Final EIS because the possible actions discussed in the letters were either not included in the draft Comprehensive Plan or had been subject to prior environmental review, or both. These possible actions are not contained in the Mayor's Recommended Comprehensive Plan. FACT SHEET1. SUMMARY2. ALTERNATIVES3. ANALYSIS

4. COMMENTS APPENDICES

Seattle Comprehensive Plan Update **Final EIS** May 5, 2016

B.6 Limitations on Industrial Lands

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## GARY MERLINO CONSTRUCTION COMPANY

June 18, 2015

Ms. Diane Sugimura Director, Seattle Department of Planning & Development 700 5<sup>th</sup> Ave #2000 Seattle, WA 98104

Dear Mayor Murray,

I'm writing to express my deep concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land.

These amendments from the Department of Planning and Development (DPD) place unnecessary limitations on land use in the city's industrial areas, where non-industrial uses were dramatically limited in 2007. They impose a one-size-fits-all set of rules on all of Seattle's diverse industrial lands, from the Duwamish Industrial Area, Georgetown, and SODO through Ballard and Interbay. Each of these areas features a unique mix of land uses and should not be painted with the same broad brush.

Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is protected in perpetuity with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers.

As strong supporters of Seattle's maritime, manufacturing and industrial heritage and future, we recognize that the working waterfront in SODO, the Duwamish, and areas south of Spokane St. are clearly industrial and should remain that way. But on the edges there should be flexibility and a mix of uses. The city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses forever into the future. Imagine if the proposed restrictions had been applied to the South Lake Union area 100 years ago. At that time, who could have predicted the downfall of the logging industry, the advent of the internet and in turn the creation of thousands of jobs in this area from non-industrial uses? Why should we limit similar beneficial uses in the future?

In areas such as Georgetown, the Duwamish and the Stadium District, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. <u>IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility</u>. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in



Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

Our own Pier 1 Property is a perfect example of where the IC zone could and should be allowed. It is a sliver of land surrounded by residential, commercial and industrial uses. It is on the "quiet" side of the Terminal 5 noise buffer and has been underutilized for more than 20 years. The site constraints and adjacent land uses preclude it from ever becoming a well utilized industrial property. Why not allow these types of properties to peruse developments that fit the nature of the property and give back to their communities through increased access and jobs? Each and every property is different, do not restrict uses solely based on location or historical zoning.

We're equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in SODO and other areas bordering heavy industrial/manufacturing uses for the foreseeable future.

Seattle is a land-locked urban city – ringed by mountains and water and restricted by 65 percent of its land preserved in single-family use. Unless the city is going to subsidize rents, land values are going to continue to climb and cheaper rents are going to be easily found in outlying markets like Kent, Auburn and Everett. This isn't anyone's fault – it's just economics.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. In the intervening years, much of that promised work (via Resolution 31026) was never completed, finished past deadline, or implemented only in partial form, raising major concerns about the implications of the proposed amendments for commercial and retail developers.

Some have argued that this work was predicated as part of the Arena Co. Memorandum of Understanding (MOU) with the City of Seattle and King County. This is not the case. That directive was limited to the Duwamish area and that study was completed. It in no way set the stage for sweeping legislation that impacts Ballard, Interbay, Fremont, SODO, and Georgetown.

We are also concerned about the lack of outreach associated with the Department of Planning and Development Studies that lead up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property owners or neighborhood developers, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from these



GARY MERLINO CONSTRUCTION COMPANY

stakeholder groups into the 2035 Comprehensive Plan Amendment process as a fait accompli.

As neighborhood property owners and neighborhood developers, we are consistently left out of the discussion when it comes to the direction of industrial land in our communities. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-theground economics from owners, owner/operators and land holders – and instead only reflects the perspective of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Jimmy Blais

Gary Merlino Construction Co. Inc. 9125 10th Avenue South Seattle, WA 98108 Ofc 206-762-9125/ Fax 206-763-4178/ Cell 206-255-5153 JBlais@gmccinc.com

cc: 2035@seattle.gov

**B.6** 

# $P A N A T T O N I^{\circ}$

June 18, 2015

Hon. Edward B. Murray Mayor, City of Seattle 600 4<sup>th</sup> Ave. 7<sup>th</sup> Floor Seattle, WA 98104

Dear Mayor Murray,

I'm writing to express my deep concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land. These "late" amendments from the Department of Planning and Development (DPD) have sweeping, unnecessary implications and should not be advanced.

Panattoni Development is proud to be one of the largest industrial developers in North America. Here in Seattle, we've been one of the most active developers in the Puget Sound Region for more than a decade. Since 2003, we've developed more than 9.7 million square feet of commercial space and have an estimated 1.8 million in the pipeline for 2016/2017.

We're strong supporters of Seattle's maritime, manufacturing and industrial heritage and we continue to build for its users, including Boeing, Whirlpool, Campbell's Soup and Food Lifeline.

Currently, more than 85% of Seattle's current industrial land base (IG1 and IG2 zoning) is forever protected with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits a majority of office and retail uses.

We support these protections, but do not support DPD's one-size-fits-all zoning amendments that have unnecessarily and permanently restrict flexibility in Industrial Commercial zones and in all Manufacturing / Industrial Centers. IC zones comprise only 6% of Seattle' industrial land base and are located where they we need zoning flexibility – along 15<sup>th</sup> Ave / Elliot Ave in Interbay, along Leary Way between Ballard and Fremont, near residential areas of Georgetown in northern areas of SODO.

We're equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC).

But perhaps most importantly, we're one of a large number of industrial developers, land owners, operators and existing businesses who continually feel left out of discussions around industrial lands. The DPD meeting that NAIOP (Washington State's Commercial Real Estate Association) requested was the first time we've been invited to a discussion like this. City studies, interviews, case studies and meetings revolve mostly around existing industrial tenants – not landowners, developers or owner/operators.

Seattle is a land-locked urban city – ringed by mountains and water and restricted by 75% of its land preserved in single-family use. Unless the city is going to subsidize rents, as the Port of Seattle does for its maritime and industrial tenants, land values are going to continue to climb and cheaper rents are going to be easily found in outlying markets like Kent, Auburn and Everett. This isn't anyone's fault – it's just economics.

The city is doing a great job protecting its working waterfronts throughout the city and shielding heavy industrial and maritime use from commercial activity. But on the edge – which is where Industrial Commercial land exists – there should be natural flexibility and a mix of non-residential uses.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. In the intervening years, much of that work was never completed, finished past deadline, or implemented only in partial form, raising major concerns about the implications of the proposed amendments for commercial and retail developers.

Nearly a decade later, the city has the opportunity to avoid a similar mistake. I urge you to remove the proposed restrictions on industrial development from the Comprehensive Plan – we're already rightly preserving 87% of our Industrial land base with extremely restrictive zoning. When thinking ahead to 2035, we should allow flexibility for the 6% of IC zoned areas – not further restrict what little land Seattle has for flexible urban use.

Sincerely,

Bart Brynestad Seattle Partner Panattoni Development

cc: 2035@seattle.gov Kate Joncas, Deputy Mayor, City of Seattle Diane Sugimura, Director, Seattle Department of Planning & Development Kathy Nyland, Director, Department of Neighborhoods Tim Burgess, Seattle City Council Bruce Harrell, Seattle City Council Mike O'Brien, Seattle City Council Tom Rasmussen, Seattle City Council



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As strong supporters of Seattle's maritime, manufacturing and industrial heritage and future, we recognize that the working waterfront in SODO, the Duwamish, and areas south of Spokane St. are clearly industrial and should remain that way. But on the edges—which is where Industrial Commercial land exists—there should be flexibility and a mix of non-residential uses. And the city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses in the future.

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12131 113<sup>th</sup> Ave NE, Suite 100 • Kirkland, WA 98034 • 206.382.9121 • <u>www.naiopwa.org</u>



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When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. In the intervening years, much of that promised work (via Resolution 31026) was never completed, finished past deadline, or implemented only in partial form, raising major concerns about the implications of the proposed amendments for commercial and retail developers.

Some have argued that this work was predicated as part of the Arena Co. Memorandum of Understanding (MOU) with the City of Seattle and King County. This is not the case. That directive was limited to the Duwamish area and that study was completed. It in no way set the stage for sweeping legislation that impacts Ballard, Interbay, Fremont, SODO, and Georgetown.

We are also concerned about the lack of outreach associated with the Department of Planning and Development Studies that lead up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property owners or neighborhood developers, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from these stakeholder groups into the 2035 Comprehensive Plan Amendment process as a fait accompli.

As neighborhood property owners and neighborhood developers, we are consistently left out of the discussion when it comes to the direction of industrial land in our communities. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground economics from owners, owner/operators and landholders – and instead only reflects the perspective of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

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As such, I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Sharon Coleman President, NAIOP Washington State

cc: 2035@seattle.gov Kate Joncas, Deputy Mayor, City of Seattle Diane Sugimura, Director, Seattle Department of Planning & Development Kathy Nyland, Director, Department of Neighborhoods Tim Burgess, Seattle City Council Bruce Harrell, Seattle City Council Mike O'Brien, Seattle City Council Tom Rasmussen, Seattle City Council

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June 18, 2015

Honorable Edward B. Murray City of Seattle PO Box 94749 Seattle, WA 98124

Dear Mayor Murray,

I'm writing to express my deep concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land.

Seattle is a city that is constantly evolving to meet the demands of growing businesses and the changing culture of our society. We can see this in the increased density in housing in downtown Seattle, the growing focus on bike lanes and in many other ways. Georgetown is a significant example of a city allowing a neighborhood to adapt to the needs of community. Since I purchased my first house in Georgetown in 2000, I have seen the neighborhood bloom. The needs of the community drove the change and the opportunity was provided by adaptive reuse of industrial buildings and support by the city for more retail and people friendly streets. It is a fantastic example of urban renewal and a city stretching to accommodate its citizens.

These amendments from the Department of Planning and Development (DPD) place unnecessary limitations on land use in the city's industrial areas, where non-industrial uses were already dramatically limited in 2007. They impose a one-size-fits-all set of rules on all of Seattle's diverse industrial lands – areas that feature a unique mix of land uses and should not be painted with the same broad brush. In any city, the use of industrial lands and the demand of in-city industry are going to evolve. Seattle is no exception despite the desire to "preserve" this land use.

87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is already protected in perpetuity with strict and rigid zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers. These plan amendments show the unrealistic desire to control land use in a rapidly growing city.

In Georgetown, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. <u>IC zones make up just six</u> percent of Seattle's industrial land base and are located precisely where we need zoning <u>flexibility</u>. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

Have you read the plan amendments? There is remarkably vague language in the proposed Comprehensive Plan Amendments that deliberately sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in Georgetown for the foreseeable future. Why would any growing city and especially Seattle, tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses down the road?

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When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a comprehensive review of Georgetown, as well as number of studies and other actions. In the intervening years, much of that promised work (via Resolution 31026) was never completed or implemented only in partial form, raising major concerns about the implications of the proposed amendments for Georgetown.

As a property owner in Georgetown I am stunned by the lack of outreach associated with the Department of Planning and Development Studies that led up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to residents of Georgetown, as <u>prescribed by Resolution 31026</u>. Recommendations from this plan were then advanced without discussion from residents and other stakeholders into the 2035 Comprehensive Plan Amendment process as a fait accompli. This lack of transparency must mean that special interest groups and lobbyists are driving these decisions. It is disappointing to see evidence of what drives the dysfunction of Congress in our own city.

Georgetown residents are consistently left out of the discussion when it comes to the direction of industrial land in our community. As a result, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground perspective from residents, property owners, businesses and landholders – and instead only reflects the interests of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

It is long past time to bring balance and fair representation to industrial land policy direction so that any changes in land use regulation are made with the context of the needs of our growing city.

I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Shannon Donohue

Georgetown Property Owner <u>smdonohue@comcast.net</u>

CC:

2035@seattle.gov Kate Joncas, Deputy Mayor, City of Seattle Diane Sugimura, Director, Seattle Department of Planning & Development Tim Burgess, Seattle City Council Bruce Harrell, Seattle City Council Mike O'Brien, Seattle City Council Tom Rasmussen, Seattle City Council Kathy Nyland, Acting Director, Department of Neighborhoods June 18, 2015

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I'm equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in Georgetown for the foreseeable future. And the city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses down the road.

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I am also concerned about the lack of outreach associated with the Department of Planning and Development Studies that led up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to residents of Georgetown, as prescribed by Resolution 31026. Recommendations from this plan were then advanced without discussion from

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Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Jon Dove

Georgetown Resident 823 S. Orcas St., Seattle 98108 jonbdove@gmail.com

cc:

2035@seattle.gov Kate Joncas, Deputy Mayor, City of Seattle Diane Sugimura, Director, Seattle Department of Planning & Development Tim Burgess, Seattle City Council Bruce Harrell, Seattle City Council Mike O'Brien, Seattle City Council Tom Rasmussen, Seattle City Council Kathy Nyland, Acting Director, Department of Neighborhoods June XX, 2015

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As strong supporters of Seattle's maritime, manufacturing and industrial heritage and future, we recognize that the working waterfront in SODO, the Duwamish, and areas south of Spokane St. are clearly industrial and should remain that way. But on the edges—which is where Industrial Commercial land exists—there should be flexibility and a mix of non-residential uses. And the city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses in the future.

In areas such as Georgetown and the Stadium District, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. <u>IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility.</u> Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

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When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. In the intervening years, much of that promised work (via Resolution 31026) was never completed, finished past deadline, or implemented only in partial form, raising major concerns about the implications of the proposed amendments for commercial and retail developers.

Some have argued that this work was predicated as part of the Arena Co. Memorandum of Understanding (MOU) with the City of Seattle and King County. This is not the case. That directive was limited to the Duwamish area and that study was completed. It in no way set the stage for sweeping legislation that impacts Ballard, Interbay, Fremont, SODO, and Georgetown.

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Sincerely,

Chad Johnstun Dick's Restaurant Supply Property owner: 2963 1<sup>st</sup> Ave South Seattle, WA 98134

cc: 2035@seattle.gov Kate Joncas, Deputy Mayor, City of Seattle Diane Sugimura, Director, Seattle Department of Planning & Development Kathy Nyland, Director, Department of Neighborhoods Tim Burgess, Seattle City Council Bruce Harrell, Seattle City Council Mike O'Brien, Seattle City Council Tom Rasmussen, Seattle City Council June18, 2015

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Real Estate Development Company

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As a long-time business owner and developer in the neighborhood, we are equally concerned about the lack of investment or prioritization by the city to put jobs and even affordable housing near the Sodo Sound Transit station. Taxpayers have put hundreds of millions into the creation of this station, yet it sits fallow. Advancing the slate of industrial Comprehensive Plan amendments would ensure it continues its state of neglect through 2035. This is simply the wrong direction for such a transit-focused city.

We are also concerned about the lack of outreach associated with the Department of Planning and Development Studies that lead up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property owners or neighborhood developers, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from these stakeholder groups into the 2035 Comprehensive Plan Amendment process as a fait accompli.

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reflects the perspective of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, we urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely, American Life Inc.

Henry Liebman-CEO

Gregory L. Steinhauer-President

cc:

2035@seattle.gov Kate Joncas, Deputy Mayor, City of Seattle Diane Sugimura, Director, Seattle Department of Planning & Development Kathy Nyland, Director, Department of Neighborhoods Tim Burgess, Seattle City Council Bruce Harrell, Seattle City Council Mike O'Brien, Seattle City Council Tom Rasmussen, Seattle City Council



GULL INDUSTRIES, INC. • 3404 FOURTH AVENUE SOUTH • P.O. BOX 24687 • SEATTLE, WA 98124 • (206) 624-5900 • FAX (206) 624-5412 June 17, 2015

> Hon. Edward B. Murray Mayor, City of Seattle 600 4<sup>th</sup> Ave. 7<sup>th</sup> Floor Seattle, WA 98104

Dear Mayor Murray,

I'm writing to express my concern regarding the proposed Seattle 2035 Comprehensive Plan Amendments that impact some 6,000 acres of industrial land in the City of Seattle.

The proposed amendments from the Department of Planning and Development (DPD) place unnecessary restrictions on land use in the city's industrial areas, where non-industrial uses were previously restricted/limited beginning in 2007. These changes impose a one-size-fits-all set of rules for all of Seattle's diverse industrial lands, from the Duwamish Industrial Area, Georgetown, and SODO through Ballard and Interbay. Each of these areas is unique mix of land uses and should not be painted with the same broad brush.

Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is already protected into perpetuity with strict zoning regulations stemming from the 2007 "downzone", which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate threat to industrial areas that warrants the type of amendments that DPD is proposing.

We are strong advocates of Seattle's maritime and industrial users. We also recognize that the working waterfront in SODO, the Duwamish, and areas south of Spokane St. are clearly industrial and should remain that way. But outside of those areas (that portion of SODO north of Spokane Street and east of Colorado) where the typical tenant or user is not industrial — there should be flexibility and a mix of non-residential uses. The city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses in the future. Think how South Lake Union has changed in the last twenty years. Historically, it was an industrial area similar to SODO in terms of users and building types. Obviously it has undergone mammoth changes. But the amendments proposed by DPD would prevent any type of evolution or changes to any of the industrial lands to accommodate future growth.

There are many areas or "pockets" of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

We're are equally concerned about the vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in SODO and other areas bordering heavy industrial/manufacturing uses for the foreseeable future.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. Since that time, much of that promised work (via Resolution 31026) was never completed, or implemented only in partial form, which raises concerns about the implications of the proposed amendments for commercial and retail developers.

We are also concerned about the lack of outreach associated with the Department of Planning and Development Studies that lead up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property owners or neighborhood developers, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from these stakeholder groups into the 2035 Comprehensive Plan Amendment process as a fait accompli. The one meeting where a representative from DPD came and spoke to the neighborhood was extremely frustrating since it was clear that DPD was not interested in feedback, but was rather contemptuous of the neighbor's comments and concerns.

As neighborhood business and property owners we are consistently left out of the discussion when it comes to the direction of industrial land in our communities. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground economics from owners, owner/operators and landholders – and instead only reflects the perspective of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction. As such, I urge you to not move ahead with the amendments to the Comprehensive Plan.

Sincerely,

William Low SR VP Real Estate Gull Industries, Inc.



PROPERTIES

MERI

June 18, 2015

Ms. Diane Sugimura Director, Seattle Department of Planning & Development 700 5<sup>th</sup> Ave #2000 Seattle, WA 98104

Dear Mayor Murray,

I'm writing to express my deep concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land.

These amendments from the Department of Planning and Development (DPD) place unnecessary limitations on land use in the city's industrial areas, where non-industrial uses were dramatically limited in 2007. They impose a one-size-fits-all set of rules on all of Seattle's diverse industrial lands, from the Duwamish Industrial Area, Georgetown, and SODO through Ballard and Interbay. Each of these areas features a unique mix of land uses and should not be painted with the same broad brush.

Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is protected in perpetuity with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers.

As strong supporters of Seattle's maritime, manufacturing and industrial heritage and future, we recognize that the working waterfront in SODO, the Duwamish, and areas south of Spokane St. are clearly industrial and should remain that way. But on the edges there should be flexibility and a mix of uses. The city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses forever into the future. Imagine if the proposed restrictions had been applied to the South Lake Union area 100 years ago. At that time, who could have predicted the downfall of the logging industry, the advent of the internet and in turn the creation of thousands of jobs in this area from non-industrial uses? Why should we limit similar beneficial uses in the future?

In areas such as Georgetown, the Duwamish and the Stadium District, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. <u>IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility.</u> Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in



5050 First Avenue South, Suite 102 • Seattle, Washington 98134 • (206) 762-9125 Office • (206) 766-9000 Fax

Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

Our own Pier 1 Property is a perfect example of where the IC zone could and should be allowed. It is a sliver of land surrounded by residential, commercial and industrial uses. It is on the "quiet" side of the Terminal 5 noise buffer and has been underutilized for more than 20 years. The site constraints and adjacent land uses preclude it from ever becoming a well utilized industrial property. Why not allow these types of properties to peruse developments that fit the nature of the property and give back to their communities through increased access and jobs? Each and every property is different, do not restrict uses solely based on location or historical zoning.

We're equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in SODO and other areas bordering heavy industrial/manufacturing uses for the foreseeable future.

Seattle is a land-locked urban city – ringed by mountains and water and restricted by 65 percent of its land preserved in single-family use. Unless the city is going to subsidize rents, land values are going to continue to climb and cheaper rents are going to be easily found in outlying markets like Kent, Auburn and Everett. This isn't anyone's fault – it's just economics.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. In the intervening years, much of that promised work (via Resolution 31026) was never completed, finished past deadline, or implemented only in partial form, raising major concerns about the implications of the proposed amendments for commercial and retail developers.

Some have argued that this work was predicated as part of the Arena Co. Memorandum of Understanding (MOU) with the City of Seattle and King County. This is not the case. That directive was limited to the Duwamish area and that study was completed. It in no way set the stage for sweeping legislation that impacts Ballard, Interbay, Fremont, SODO, and Georgetown.

We are also concerned about the lack of outreach associated with the Department of Planning and Development Studies that lead up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property owners or neighborhood developers, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from these

# MERLINO

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stakeholder groups into the 2035 Comprehensive Plan Amendment process as a fait accompli.

As neighborhood property owners and neighborhood developers, we are consistently left out of the discussion when it comes to the direction of industrial land in our communities. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-theground economics from owners, owner/operators and land holders – and instead only reflects the perspective of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Male

Brad Merlino MERLINO PROPERTIES 5050 1<sup>st</sup> Avenue South, Suite 102 Seattle WA 98134 email: <u>Brad@merlinoproperties.com</u> | ph: 206.658.0950 | f: 206.766.9000

cc: 2035@seattle.gov



PO Box 80021, Seattle, WA 98108

June 18, 2015

Honorable Edward B. Murray City of Seattle PO Box 94749 Seattle, WA 98124

Dear Mayor Murray,

We're writing to express our great concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land.

These amendments from the Department of Planning and Development (DPD) place unnecessary limitations on land use in the city's industrial areas, where non-industrial uses were dramatically limited in 2007. They impose a one-size-fits-all set of rules on all of Seattle's diverse industrial lands – areas that feature a unique mix of land uses and should not be painted with the same broad brush.

Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is protected in perpetuity with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers.

In Georgetown, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. <u>IC zones make up just six percent of</u> <u>Seattle's industrial land base and are located precisely where we need zoning flexibility</u>. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

We're equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in Georgetown for the foreseeable future. And the city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses down the road.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a comprehensive review of Georgetown, as well as number of studies and other actions. In the intervening years, much of that promised work (via Resolution 31026) was never completed or implemented only in partial form, raising major concerns about the implications of the proposed amendments for Georgetown.

We are also concerned about the lack of outreach associated with the Department of Planning and Development Studies that led up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to residents of Georgetown, as prescribed by Resolution 31026. Recommendations from this plan were then advanced without discussion from residents and other stakeholders into the 2035 Comprehensive Plan Amendment process as a fait accompli.

Georgetown residents are consistently left out of the discussion when it comes to the direction of industrial land in our community. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground perspective from residents, property owners, businesses and landholders – and instead only reflects the interests of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, we urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Matt Pearsall Georgetown Community Council, Secretary

cc: 2035@seattle.gov Kate Joncas, Deputy Mayor, City of Seattle Diane Sugimura, Director, Seattle Department of Planning & Development Tim Burgess, Seattle City Council Bruce Harrell, Seattle City Council Mike O'Brien, Seattle City Council Tom Rasmussen, Seattle City Council Kathy Nyland, Acting Director, Department of Neighborhoods

#### HRP Properties P. O. BOX 700 • MERCER ISLAND, WA 98040 Phone: 206-232-7500 Fax: 206-232-1585

June 17, 2015

Hon. Edward B. Murray Mayor, City of Seattle 600 4<sup>th</sup> Ave. 7<sup>th</sup> Floor Seattle, WA 98104

Dear Mayor Murray,

I'm writing to express my deep concern about the proposed Seattle 2035 Comprehensive Plan Amendments that impact Seattle's 6,000 acres of industrial land.

These amendments from the Department of Planning and Development (DPD) place unnecessary limitations on land use in the city's industrial areas, where non-industrial uses were dramatically limited in 2007. They impose a one-size-fits-all set of rules on all of Seattle's diverse industrial lands, from the Duwamish Industrial Area, Georgetown, and SODO through Ballard and Interbay. Each of these areas features a unique mix of land uses and should not be painted with the same broad brush.

Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is protected in perpetuity with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers.

As strong supporters of Seattle's maritime, manufacturing and industrial heritage and future, we recognize that the working waterfront in SODO, the Duwamish, and areas south of Spokane St. are clearly industrial and should remain that way. But on the edges—which is where Industrial Commercial land exists—there should be flexibility and a mix of non-residential uses. And the city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses in the future.

In areas such as Georgetown and the Stadium District, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. <u>IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility.</u> Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

We're equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in SODO and other areas bordering heavy industrial/manufacturing uses for the foreseeable future.

Seattle is a land-locked urban city – ringed by mountains and water and restricted by 65 percent of its land preserved in single-family use. Unless the city is going to subsidize rents, land values are going to continue to climb and cheaper rents are going to be easily found in outlying markets like Kent, Auburn and Everett. This isn't anyone's fault – it's just economics.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. In the intervening years, much of that promised work (via Resolution 31026) was never completed, finished past deadline, or implemented only in partial form, raising major concerns about the implications of the proposed amendments for commercial and retail developers.

Some have argued that this work was predicated as part of the Arena Co. Memorandum of Understanding (MOU) with the City of Seattle and King County. This is not the case. That directive was limited to the Duwamish area and that study was completed. It in no way set the stage for sweeping legislation that impacts Ballard, Interbay, Fremont, SODO, and Georgetown.

We are also concerned about the lack of outreach associated with the Department of Planning and Development Studies that lead up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property owners or neighborhood developers, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from these stakeholder groups into the 2035 Comprehensive Plan Amendment process as a fait accompli.

As neighborhood property owners and neighborhood developers, we are consistently left out of the discussion when it comes to the direction of industrial land in our communities. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-theground economics from owners, owner/operators and landholders – and instead only reflects the perspective of industrial/manufacturing tenants (existing and those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

**HRP** Properties

utomonaca

John Pietromonaco Owner

cc: 2035@seattle.gov Kate Joncas, Deputy Mayor, City of Seattle Diane Sugimura, Director, Seattle Department of Planning & Development Kathy Nyland, Director, Department of Neighborhoods Tim Burgess, Seattle City Council Bruce Harrell, Seattle City Council Mike O'Brien, Seattle City Council Tom Rasmussen, Seattle City Council



June 17, 2015

Hon. Edward B. Murray Mayor, City of Seattle 600 4<sup>th</sup> Ave. 7<sup>th</sup> Floor Seattle, WA 98104

Dear Mayor Murray,

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Currently, 87 percent of Seattle's industrial land base (IG1 and IG2 zoning) is protected in perpetuity with strict zoning regulations stemming from the 2007 'downzone', which expressly prohibits the vast majority of office and retail uses. With these restrictions already in place, there is no immediate, imminent threat to Seattle's industrial areas that necessitates new restrictions that permanently constrain flexibility in Industrial Commercial zones and in all Manufacturing/ Industrial Centers.

As strong supporters of Seattle's maritime, manufacturing and industrial heritage and future, we recognize that the working waterfront in SODO, the Duwamish, and areas south of Spokane St. are clearly industrial and should remain that way. But on the edges—which is where Industrial Commercial land exists—there should be flexibility and a mix of non-residential uses. And the city should not tie its own hands by restricting the ability to convert Manufacturing/Industrial land to other uses in the future.

In areas such as Georgetown and the Stadium District, there are many pockets of underutilized land that should be allowed to evolve through the continued use of Industrial Commercial zoning. <u>IC zones make up just six percent of Seattle's industrial land base and are located precisely where we need zoning flexibility</u>. Eliminating this zoning designation would eliminate that flexibility and preclude future land uses in



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Seattle's industrial border areas, areas that serve as buffers between residential urban areas and industrial and manufacturing centers.

We're equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in SODO and other areas bordering heavy industrial/manufacturing uses for the foreseeable future.

Seattle is a land-locked urban city – ringed by mountains and water and restricted by 65 percent of its land preserved in single-family use. Unless the city is going to subsidize rents, land values are going to continue to climb and cheaper rents are going to be easily found in outlying markets like Kent, Auburn and Everett. This isn't anyone's fault – it's just economics.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. In the intervening years, much of that promised work (via Resolution 31026) was never completed, finished past deadline, or implemented only in partial form, raising major concerns about the implications of the proposed amendments for commercial and retail developers.

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We are also concerned about the lack of outreach associated with the Department of Planning and Development Studies that lead up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property owners or neighborhood developers, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from these stakeholder groups into the 2035 Comprehensive Plan Amendment process as a fait accompli.

As neighborhood property owners and neighborhood developers, we are consistently left out of the discussion when it comes to the direction of industrial land in our communities. As such, the direction advanced in the 2035 Comprehensive Plan doesn't include on-the-ground economics from owners, owner/operators and land holders – and instead only reflects the perspective of industrial/manufacturing tenants (existing and



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those who have left town), industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balance and fair representation to industrial land policy direction.

As such, I urge you to not move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Dave Sabey President Sabey Corporation

cc:

2035@seattle.gov Kate Joncas, Deputy Mayor, City of Seattle Diane Sugimura, Director, Seattle Department of Planning & Development Tim Burgess, Seattle City Council Bruce Harrell, Seattle City Council Mike O'Brien, Seattle City Council Tom Rasmussen, Seattle City Council **Rainier Pacific Company** 2201 SIXTH AVENUE SOUTH, SEATTLE, WA 98134 (206) 622-6288 FAX (206) 622-6282

June 18, 2015

Hon. Edward B. Murray Mayor, City of Seattle 600 4<sup>th</sup> Ave. 7<sup>th</sup> Floor Seattle, WA. 98104

Dear Mayor Murray:

As the manager and owner of family real estate holdings in the heart of Sodo, I am most concerned about the proposed Comprehensive Plan Amendments affecting industrial lands under review. I believe it was with great reluctance that Mr. Tom Hauger of DPD came to Sodo stakeholders and revealed the plan earlier this year, and it was a most unsatisfying meeting. Without fair notice or input from all sectors, DPD has seemingly pre-destined the future of our Sodo District where I have worked for 37 years and have family history reaching back 100 years.

For background, our family owns 8 tax parcels totaling 5.5 acres adjacent to Sodo Light Rail Station and the E-3 Busway. Our former 100,000 S.F. Stack Steel industrial facility at 500 S. Lander was demolished to make way for Sodo Station almost a decade ago which, in the process, displaced a dozen industrial businesses no longer operating in Seattle.

The City's 2035 Comprehensive Plan poses a regressive land use policy even more restrictive than the 2007 Overlay downzone. Moreover, current station area design and land use restrictions thoroughly wastes the multi-million dollar light rail investment as evidenced by Sodo Station posting the lowest ridership among all stations. Ensuring a return of jobs near this transit site through flexible zoning seems like a wise return on the taxpayer's investment at Sodo Station – yet the proposed industrial Comprehensive Plan amendments would further isolate this station area through 2035.

The shrewdest move, and to be consistent with transportation oriented development (TOD) at other station areas, would be to encourage density via IC Zoning at Lander Street's Sodo Station. All station areas in Rainier Valley were up-zoned to encourage pedestrian traffic and use of mass transit, while the Sodo zoning moved in the opposite direction. That brief experiment so far, has not stemmed the outflow of industrial jobs. Modern market demand calls for the flexibility of IC zoning that will smartly capitalize upon our huge public investment in light rail. More jobs will come with the right type of space next to a mass transit stop. Currently, our 1.5 acres of graveled land next to Sodo Station creates yard space but no jobs and under current and contemplated restraints, the outlook is for more of the same.

We're equally concerned about the remarkably vague language in the proposed Comprehensive Plan Amendments that sets an unattainably high bar for removing any land from Seattle's massive Manufacturing / Industrial Centers (M/IC). Should the city adopt this language, it would significantly limit future retail and commercial uses in SODO and other areas bordering heavy industrial/manufacturing uses for the foreseeable future.

When the city adopted the 2007 industrial downzone legislation, the City Council promised to complete a number of studies and other actions to ensure that industrial developers weren't being unfairly restrained in their ability to develop their land. This work was also supposed to examine the outdated definition of industrial, which does not reflect modern, evolving industrial uses – such as programming, biotechnology, and CAD work. In the intervening years, much of that promised work (via Resolution 31026) was never completed, finished past deadline, or implemented only in partial form, raising major concerns about the implications of the proposed amendments for commercial and retail developers.

One of the city's promises stemming from the 2007 downzone was an earnest industrial jobs study, that included input from property owners and owner/operators – not just tenants...but this has not occurred.

Given that over 50 percent of Sodo lands are exempt from Comprehensive Planning, be it railroads, Port, Stadium, Metro, government functions etc., the remaining private lands are so seriously constrained, investment is not only dis-incentivized, but wholly cost prohibitive.

For instance, several of our properties are 60-year-old budget buildings that fill the tax lot wall to wall as was once allowed. Current Code restricts lot coverage to perhaps 50% thus you have less rentable floor space requiring higher rents than industrial users will find outside the City. Land values per KCA are 5+ times higher than any manufacturer of scale can justify, if you could find land to redevelop, and the fact is, governmental agencies have been responsible for the greatest loss of close-in industrial facilities, far more than the private sector.

This fact was advanced during our recent Sodo property owner meeting with DPD and it was clear this one of the first times this was heard and/or understood – another reason for the city to open better dialogue with Sodo property owners, developers and owner/operators.

The result of current land use planning will be for operators like us to withhold investment and instead band-aid ancient, dysfunctional properties renting to alternative fill-in or service uses, as are several of our tenants today. Modern industry is not attracted to constrained, expensive parcels in a congested neighborhood, which is what Sodo has to offer today. Economics of the land alone should be simple to understand and sad to say.....stagnation will be the destiny of Sodo under proposed amendments. If the City took to heart honest statistics, and worked in unbiased fashion with the stakeholders most impacted, they would conclude that restrictive zoning will only perpetuate a neighborhood of run-down, makeshift, relic facilities barely suitable for strip clubs, drug treatment centers, pot shops and transients in RVs. Given that I spend more than 50 hours a week in Sodo, I assure you this is the current state of Sodo today. There has also been a distinct lack of outreach associated with the Department of Planning and Development Studies leading up to this recommendation. The November 2013 Duwamish M/IC Policy and Land Use Study did not include outreach to property owners, nor did the January 2015 Local Production Study. Recommendations from these plans were then advanced without discussion from vital stakeholder groups into the 2035 Comprehensive Plan Amendment process and assumed a fait accompli.

As neighborhood land owners, we have been undemocratically been left out of the discussion when it comes to the future of our own properties. As such, the direction advanced in the 2035 Comprehensive Plan does not include on-the-ground economics from owner/operators and landholders – and instead unfairly reflects the perspective of only industrial/manufacturing tenants, industrial lobbying groups, pro-industrial associations, labor groups and public entities, such as the Port of Seattle. While these are important perspectives, they are one side of the discussion.

Before sweeping recommendations are advanced, it's time to bring balanced and fair representation to industrial land policy.

Just as old growth timber once stood under City Hall; where we once had a working waterfront; where SLU once had a lumber mill and boat yards, things change and are thought to be for the betterment of all.

As such, I urge you to NOT move ahead with the proposed restrictions on industrial development from the Comprehensive Plan.

Sincerely,

Robert H.

Robert H. Stack – Manager Pacific Investment Co. Rainier Pacific Co. Stack Industrial Properties LLC Lander at Sixth LLC WES 2233 LLC Prime NW LLC

cc: 2035@seattle.gov Kate Joncas, Deputy Mayor, City of Seattle Diane Sugimura, Director, Seattle Department of Planning & Development Kathy Nyland, Director, Department of Neighborhoods Tim Burgess, Seattle City Council Bruce Harrell, Seattle City Council Mike O'Brien, Seattle City Council Tom Rasmussen, Seattle City Council