



April 10, 2022

To: Jim Holmes and the Seattle Maritime Strategy Planning Team

Thank you to OPCD for presenting the Industrial Maritime Strategy to the Bicycle Advisory Board in March. We are grateful for your time and appreciate the work that has gone into reimagining the land use types around transit stations in the alternative plans. We are, however, concerned that the process around the strategy has not had a citywide outreach process and is happening independently from both the updates to the Comprehensive Plan and the new Seattle Transportation Plan. We feel that any industrial zoning changes should only happen after a complete outreach process *that wraps discussions of the future of industrial zoning into the Comprehensive Plan process*. And we believe it is key to lead with safety: conflicts with large vehicles, poorly defined and unimproved roadways, the lack of sidewalks, and rough railroad tracks all make industrial areas challenging to navigate for people who walk, roll, and bike through these lands.

In particular, we want to emphasize the following for the Industrial Maritime Strategy Planning:

- It's critical to have feedback from and address the needs of community members who walk, roll, and bike through industrial areas of the city in the strategy, particularly because the area is a key connection between West Seattle, South Park, and other parts of South Seattle with downtown.
- With the job-growth goals in industrial land, planning for better access to industrial areas with other modes of transportation – besides cars and freight – can open opportunities to jobs in the area for those who do not have access to vehicles, while also supporting Seattle's mode-shift goals.
- Changes to industrial zoning can address pollution and climate change issues.

We elaborate further on these points in the rest of this letter.

The board is concerned that changes to industrial land use types made through the strategy will be solidified before the wider outreach around the Comprehensive and Transportation plans. This means the many members of the community who walk, roll, and bike through the industrial areas of the city, but who were not captured by a limited outreach process, will simply be ignored. The Industrial Maritime Strategy was predicated on the assumption that the *preservation* of existing industrial land uses is the best (and only) outcome of the process and therefore dismisses any ideas for a more thoughtful and creative approach to the valuable and sensitive traditional waterfront lands of *the Coast Salish people, including the Duwamish People past and present*.

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The Seattle Bicycle Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the city on matters related to bicycling, and the impact which actions by the city may have upon bicycling; and shall have the opportunity to contribute to all aspects of the city's planning processes insofar as they relate to bicycling.

– City Council
Resolution 25534



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The industrial areas - particularly SoDo and the Duwamish Valley - are of particular concern to the Bicycle Advisory Board as there are major existing cycling routes connecting through the area from South Park and West Seattle to downtown, as well as incomplete routes to Beacon Hill, Georgetown, and the International District. Waterfront parks dot the Duwamish but are still deemed “industrial” on the zoning maps and left isolated by unimproved roads. The industrial zoning and the lack of street improvements create vast holes in the networks. Conflicts with large trucks, poorly defined and unimproved roadways, the lack of sidewalks, and rough railroad tracks all make industrial areas inhospitable to all but the most adventuresome cyclists and fragment the safe routes such that they are relatively useless.

Perhaps of most relevance to the job-growth goals of the strategy, *safe bike routes are attractive to potential employees.* Businesses in the Duwamish Valley with their own progressive climate goals and who support reducing car trips have trouble discouraging their employees from driving because of the lack of transit and safe walking and bike routes. Land that could go to manufacturing and logistics is wasted on parking employee cars. All of the alternatives present a business-as-usual strategy (after all, only 13% of any of the existing zoning will change in the most extreme option!) and therefore will not be enough to meet the city’s 20% vehicle trip reduction goals. ***All industrial jobs should be accessible by walking, biking, and transit, not just those in areas called “Urban Industrial” and “Industry & Innovation,” which are geographically limited.*** If safe streets are not included in the “Maritime, Manufacturing, and Logistics” area - the vast majority of the areas shown in all alternatives, the Duwamish Valley and SoDo will continue to be fragmented and relatively impassable to those outside of vehicles.

New development standards must be adopted into the code around all industrial zoning that elevate the safety of living human bodies and make getting to the businesses there without a car possible, including frontage standards that include sidewalks, trees to prevent heat islands, and safe well-defined driveways. Inhospitable roads limit the types of workers who can even take the high-quality jobs offered in the industrial areas to those with access to cars, which is the embodiment of inequity.

A more detailed analysis of existing uses in the Duwamish Valley should inform the zoning changes and codify uses where biking and walking are already most likely to happen. While Alternative 4 recognizes some of the uses on 1st Ave S in SoDo, it leaves off Airport Way, where well north of Georgetown there are pedestrian scale buildings that would be a natural fit for “urban industrial” zoning. Rather than “encroaching” on industrial zones, many of these businesses are in buildings that are remnants from the time streetcars supported walkable neighborhoods in these areas. SBAB has advocated for a safe route from Georgetown to downtown for years now –

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but all of the continuous north-south streets are freight corridors, lined with industrial zoning. Deliberate and careful changes to zoning could align to improvements to a direct route and encourage businesses to locate where they can best take advantage of a safe bike route for their employees and patrons.

Finally, the issues of pollution and climate change are poorly addressed by all options. Heavy industry contributes to poor air and water quality that affects the health of cyclists and all citizens moving around the industrial lands. Rising sea levels will soon be inundating portions of the maritime industrial lands, making them unusable and presenting health risks. Both of these issues need to be addressed in the land use code through overlays that limit the types of pollution-generating activities that can be located near residential areas and prevent toxic byproducts from entering our water bodies when higher tides flood businesses in low-lying areas. Bike routes too will be impacted, as recent King Tides have already shown that the Duwamish Trail in South Park is vulnerable to being cut off by flooding in the industrial business area.

The Draft EIS acknowledges many of the issues we raise in this letter, including increased safety hazards. The DEIS unfortunately lacks any concrete measures for holding the city accountable to address these hazards and actually mitigate these harms. **We ask that the city deliver on its climate and equity goals by setting aside funds for mitigation projects and codifying mitigation measures at the same time as it recomits to maintaining heavy industry on the waterfront land of the Duwamish People.**

Thank you for taking the time to present to the Bicycle Advisory Board. While we are happy to see that the strategy provides for some new subtlety to the land uses in the industrial areas, we feel its approach is far too limited and that any changes to industrial land uses should be wrapped into the process for the Comprehensive Plan and involve outreach throughout the city.

Sincerely,

The Seattle Bicycle Advisory Board

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