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May 6, 2024

Mr. Michael Hubner
Department of Planning and Community Development
City of Seattle
Via email: OneSeattleCompPlan@seattle.gov

Subject: ***Draft One Seattle Plan – Review by Port of Seattle and The Northwest Seaport Alliance***

Dear Michael,

On behalf of the Port of Seattle (Port) and The Northwest Seaport Alliance (NWSA), we thank you for the opportunity to review and comment on the Public Review Draft of the One Seattle Plan.

The Port and the NWSA, as key stakeholders in Seattle's growth and development, are deeply committed to advocating for the preservation of Seattle's Industrial Lands and Freight Corridors. We were thrilled to see the City's landmark legislation in July 2023, which implemented a robust Industrial and Maritime Strategy, a strategy we see reflected in the One Seattle Plan. As the City takes on the challenge of the housing crisis by introducing 80,000 new units, we are eager to stand as strong government partners. We applaud the draft plan's emphasis on quality jobs for our growing city. Our unwavering commitment to supporting economic vitality, resiliency, and living wage jobs in line with population growth targets is a testament to our dedication to Seattle's future.

Our port terminals are pivotal for cultivating and modernizing our region's supply chain. Building our existing assets—such as naturally deep-water ports, a skilled and educated workforce, and adjacent land to stage these activities—can point the way to a brighter and, with our continued investment, a greener future. For instance, we are currently in the planning stage to bring shore power to Terminal 18 on Harbor Island, a project that will significantly reduce our carbon footprint. Such properties can host these hubs of activity that can naturally bring together manufacturing jobs, laboratory research facilities, and commensurate apprenticeship and job training opportunities. These conditions are informing our Central Waterfront Clean Energy Strategic Plan. For example, in partnership with Seattle City Light, the Port is advancing an innovative solution to bring shore power to our downtown waterfront cruise terminal at Pier 66. Along with our partners at the NWSA, we have already brought shore power to our Terminal 5 cargo facility and are currently in the planning stage to bring shore power to Terminal 18 on Harbor Island.

Maritime freight in the Pacific Northwest is not just a transportation system, but a robust economic driver that supports local businesses and regional export activities alike. It is a crucial part of the region's

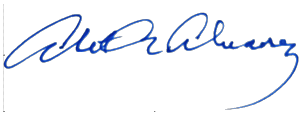
transportation resiliency. Without this system's resilience, international freight is likely to divert to other gateways, leading to goods being trucked into the region from Canada or California, brought in from ports that may have lower environmental standards, or even lengthening the trip from suburban and distant warehouse and cargo storage. The urgency of preserving this system, which is so vital to our economic and environmental sustainability, cannot be overstated.

We are deeply grateful for the City's recognition of our efforts, as evidenced by the late revision of the Seattle Transportation Plan adopted last month. The revision was to the overarching goal structure where the "Mobility" goal was changed to the "Mobility and Economic Vitality Goal." To protect the freight capacity provided by our maritime facilities, we are concerned with the removal of the prior plan's existing policy defining the unique purpose and value of the Heavy Haul Network, which was created through a memorandum of understanding between the POS and the City. To update the language, the policy can shift its focus to preserving and maintaining this network. In the spirit of the Container Port Element, we plan to continue to work with the City on maintaining the utility and priority of these essential transportation networks for freight mobility while ensuring improved safety for all users.

Moreover, the economic vitality brought by our cruise terminals and international airport to Downtown Seattle is unparalleled. Each cruise season injects over $900 million into the local economy, supporting local businesses and creating more than 5,500 local jobs. The airport stands as a significant asset and contributor.

Our Planning Staff, with their extensive knowledge and experience in urban planning and development, has compiled a technical appendix addressing this review's specific plan goals and policies. We look forward to working with you to finalize the One Seattle Plan, leveraging our expertise and resources to ensure the plan aligns with the city's economic and environmental goals.

Sincerely,



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Comment Letter Technical Appendix

Port of Seattle and Northwest Seaport Alliance letter on draft One Seattle Plan, May 6, 2024

The Planning Department staff of the Port of Seattle and The Northwest Seaport Alliance offer the following technical comments in concert with our topline comments in our cover letter dated May 6, 2024.

Element / element subsection	Comment
Introduction	
Page 7	Suggest adding underlined text: The Plan embraces a vision of growth without displacement of households, businesses, <u>industries</u>, and cultural communities that are currently at risk of being forced to leave Seattle.
Growth Strategy Element	
GS / 2	It is understood that follow-on planning work is needed for setting the boundaries of all proposed Neighborhood Centers (as represented by an airbrushed graphical treatment for these proposed centers in the proposed Future Land Use Map.) At the same time, the Port and Alliance assume that none of these boundaries will reduce the size of nearby Manufacturing / Industrial Centers (MIC's), based on the exhaustive process leading to affirmation of MIC boundaries in the July 2023 industrial lands legislation.
GS / 2	Regarding the proposal for north Georgetown to be designated a Neighborhood Center, the implementation of the proposal must account for three Georgetown streets having the "Major Truck Street" designation in both the adopted Seattle Transportation Plan and this draft plan. Commitment to this designation is critical for port-related operations and the Manufacturing Industrial Center as a whole. The streets are Corson Ave S, Airport Way S, and S Michigan Street.
GS / 10	Request adding a statement that the subarea plan developed for the Greater Duwamish MIC must be consistent with the Container Port policies.

GS 1.6	Suggest adding underlined text. Avoid incompatible uses adjacent to general aviation airports and cargo/container ports.
GS 10.1	Suggest adding: The subarea plan developed for the Greater Duwamish MIC must be consistent with the Container Port Element policies.
GS 10.2	Suggest adding: Station area planning located in the Greater Duwamish MIC must prioritize freight movement by road and rail, as well as pedestrian safety. Traditionally transit oriented development (TOD) (housing and pedestrian-oriented commercial uses) will not be appropriate.
Land Use Element	
LU 1.7	Request adding this clause: The subarea plan developed for the Greater Duwamish MIC must be consistent with the Container Port policies Review future legislative rezones to determine if they pose a risk of increasing the displacement of residents or creating new housing in potentially health impacted areas, especially marginalized populations, and the businesses and institutions that serve them. Suggest adding underlined text, or similar sentiment.
LU 2.21	Suggest adding underlined text: Encourage neighborhood street designs that prioritize pedestrians, provide public space, support business districts, and create space for community events.
LU 4.13	Suggest adding the underlined text: Identify uses as major noise generators based on the noise associated with certain equipment operations or the nature of a particular activity and regulate these uses to reduce noise to acceptable levels unless the noise generating use is located in an industrial zone.
LU G13.3	Suggest adding underlined text: LU G13.3 Develop transitions between industrial areas and adjacent neighborhoods that support healthy communities, reduce adverse environmental impacts, facilitate active transportation and transit access between residential and industrial areas, and minimize land use conflicts.
LU 13.23	Suggested strike/underline correction: Use the urban industrial or industrial ~~buffer~~ commercial zones to provide an appropriate transition between industrial areas and adjacent residential or pedestrian-oriented commercial zones.
LU 13.27	Suggest adding underlined text: Recognize the unique development opportunities that the Washington National Guard Armory in the BINMIC and the WOSCA site in the Duwamish MIC represent. Work with the State of Washington or other future owners of these sites to develop a comprehensive industrial redevelopment plan that maximizes public benefits and reflects

	its location within a Manufacturing and Industrial Center where housing is not a compatible use. This Plan should include features such as green infrastructure, district energy and waste management programs, and workforce equity commitments.
LU 13.28	Suggested strikethrough / underline correction (this edit applies also to LU 13.29, LU 13.30): Allow the widest possible range of manufacturing uses and related industrial and commercial activities within the industrial ~~buffer~~ commercial zone, while ensuring compatibility with the activity and physical character of neighboring less intensive zones.
Transportation Element	
PRIOR/Existing T 8.6	The prior Comp Plan had an important policy in T-8.6 related to the Heavy Haul Network. It called for "designating" a HHN ... Without this policy there is no policy statement as to the purpose of the Heavy Haul Network. After consultation with SDOT staff, we propose "Protect, preserve, and enhance a heavy haul network for truck freight to provide efficient freight operations to key port terminals and intermodal freight facilities."
Figure 16	The Heavy Haul Network should be shown on the map in this figure.
P 64-5: Intro	Add bullet to this section: "Enhance freight mobility for goods delivery throughout city, manufacturing and industrial operations in MICs and trade in our international gateway city."
p 65-6: Intro	We recommend a paragraph also on the future of freight/freight mobility -- goods delivery & de-carbonization of drayage trucks
p 66:	2nd paragraph, last sentence, please add underlined words: "In addition, transportation facilities that connect to and support "cargo movement to and through" the city's industrial areas …
p 79	Under "Supporting a Vibrant Economy" we propose a 4th sentence be added highlighting "Seattle benefits from many freight assets owned and maintained by others, including access to two close-in airports, two Class 1 railways plus a shortline, and a naturally deep harbor with multiple international marine shipping lines."
p 84	Suggest the underlined additions to the 3rd sentence: "including two interstate highways,; several state highways; a regional light rail, commuter rail, & bus system; a ferry network and cruise terminals; waterways and marine cargo terminals; and freight railroads.
T 1.6	Add "or center" at end to reflect MICs & the industrial land uses there.
T 1.10	Insert "personal" as in pursue strategies to reduce "Personal" drive-along trips … to distinguish from commercial or industrial trips which are usually only the driver.

T 2.20 and/or T 6.10	Plan for unique treatments in the MICs from urban or residential neighborhoods, to reflect the need for different solutions for Vision Zero treatments around trucks and transit.
T 2.21	Recognize that the city's major arterials are often better than minor arterials for large vehicles such as buses and trucks, so prioritize their use on major arterials to keep them from detouring to neighborhood streets. Manufacturing & Industrial Centers are unique cases.
T 3.6	First and last mile services should not be limited to private sector partnerships.
T 3.8	Recommend including shift workers, who often work at night.
TG 4	Add to the goal: Protect right-of-way space for the highest and best use to maximize the transportation system.
T 4.12	Emphasize the importance of bioswales (green infrastructure/bio-retention) adjacent to roadways to address road runoff that contributes to salmon pre-spawn mortality (i.e., 6PPD-q from tires and effectiveness of bio-retention in reducing salmon death)
T 4.13	Suggest adding: Consider transportation project materials with low embodied carbon.
T 5.12	Consider adding: Policy about increasing designated commercial loading areas that are mapped and accessible to freight drivers.
T 5.7	Update T 5.7 to read: "Work with freight stakeholders, ~~and~~ the Port of Seattle, and the Northwest Seaport Alliance to evaluate the performance of, maintain, and ~~improve intermodal freight~~ make freight priority for key connections involving Port container terminals, rail yards, industrial areas, airports, and regional highways."
T 7.12	Work with the port and the Northwest Seaport Alliance to ensure uninterrupted, ~~enhance~~ efficient, and effective access to Port terminals to minimize ~~adjacent~~ offsite impacts, which in turn, facilitates strong international and interstate trade
T 8.6, 1st comment	"Focus resources for Maintenance & Improvements in neighborhoods that have been historically subject to underinvestment or are currently underserved." We agree with this general intent, but reading it implies there may not be any maintenance & improvement in any other "neighborhoods" that aren't historically underinvested or currently under-served. Recommend city staff loosen that language with that in mind (Prioritize Maint & Imprv resources in ..."
T 8.6, 2nd comment	We recommend adding the under-invested MICs (change "neighborhoods" to "Areas" or "Centers" also)

T 8.X (NEW)	Requested new policy: Plan for elevation or reconfiguration of streets to address sea level rise and flood hazards. Coordinate with waterfront property owners and prioritize street improvements where property owners have plans to elevate or reconfigure properties to improve sea level rise and flood resilience.
Utilities Element	
U 3.1	Request adding underlined text: Coordinate planning for utility projects among City-owned utilities, City departments, and non-City utilities, <u>and major public property owners</u>, particularly projects located in <u>or near</u> the right-of-way, to lower costs, improve outcomes, provide co-benefits, limit construction and operational impacts and increase <u>sea level rise, climate</u>, and seismic preparedness.
U 3.3	Request adding underlined text: Build partnerships among City departments, non-City-utilities, public agencies, Tribal governments, and community organizations to increase capacity for collaboration in utility planning and projects <u>and maximize opportunities to increase resilience of public assets and utilities to sea level rise and climate impacts.</u>
U 3.x	Requested new policy: Plan for elevation of utilities to address sea level rise and flood hazards. Coordinate with waterfront property owners and prioritize utility improvements where property owners have plans to elevate or reconfigure properties to improve sea level rise and flood resilience.
U 4.5	Request add underlined text: Promote water conservation strategies to reduce per capita water use by customers, <u>and consider alternatives for</u> large scale rainwater capture and re-use.
U 6.10	Consider adding: Leverage Seattle's access to clean, affordable electricity and consider how to add clean energy capacity that grows with the region. Ensure not only capacity for electrification of vehicles and homes, but also ensure the grid is modernized and capable of meeting the future needs including electric trucks, buses, vessels, increased AC in a warming planet, droughts, and high-heat intensity events.
Economic Development Element	
ED 1.2	Consider stronger language based on the struggles of core city business districts: "Make investments to <u>ensure</u> a safe, walkable and accessible downtown core to <u>maintain</u> and attract businesses, residents, workers and visitors."

ED 1.7	Support business districts serving historically underserved communities, including ~~Native American~~ Indigenous communities, that have benefited from fewer economic opportunities. [Suggest using "Indigenous" for internal consistency.
ED 3.7	"Plan for and invest in transportation systems for movement of freight and people, infrastructure, and utilities to support strategic industries." Such as heavy haul corridor, railways, roadways, waterways, etc.
ED 3.12	Consider adding: Advocate for revitalization of dilapidated buildings and building sectors.
ED 7.1	Establish partnerships to build workforce capacity to advance completion of city-wide decarbonization and climate ~~adaptation~~ mitigation efforts, including through electrification, construction, conservation, and other new green technology programs. [The examples provided seem to align more with mitigation than with adaptation.]
ED 1.x	Consider adding new policy: Leverage existing private development assets in Seattle's employment centers by optimizing transit service to serve the commuters to these centers.
Climate and Environment Element	
CE 2.9	Consider adding: Reduce and mitigate vehicle-sourced roadway pollutants as a water through such means as green infrastructure / bio-retention and treating 6PPD-q from tire wear.
CE 3.5	Request adding: Support the electrification of freight vehicles through strong partnerships with the Port of Seattle and Northwest Seaport Alliance to reduce GHG emissions, improve air quality and health outcomes in communities with high freight traffic, and to support the goal of 30% of goods delivery being zero-emission by 2030.
CE 7.1	Regularly update citywide all hazard and climate vulnerability assessments that address physical, social, and economic vulnerabilities and consider cascading or compounding effects across multiple systems. Consider partnering with other public asset owners and operators to create a joint vulnerability assessment and coordinate on project prioritization.

Shoreline Areas (carried forward from Seattle 2035)	
Pg. 175 Seattle 2035	SA P8 4. Provision of appropriate public-access opportunities that meet public needs by public agencies such as the City, Port of Seattle, King County, and the State when new shoreline facilities are built (encourage these agencies to provide similar opportunities in existing facilities). These public access opportunities may be provided off-site if shown to better serve public access needs. [Add underlined text.]
Neighborhood Plans (carried forward from Seattle 2035)	
Pg. 317 Seattle 2035	Existing Text: GD-P5 Limit the location or expansion of nonindustrial uses, including publicly sponsored nonindustrial uses, in the Duwamish Manufacturing/Industrial Center. Suggestion (to be included in Greater Duwamish MIC subarea plan under development): Include clarifying language that this does not preclude transit facilities and other multi-modal transportation uses that serve the industrial workforce.