

A Scoping Notice & Comment Summary

This appendix includes the main scoping report published October 2021, which contains the summary of written comments, survey responses received, and stakeholder and public meeting input. The full scoping report, including the complete compilation of comment letters, is available online at:

<https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/IndustrialMaritimeStrategy/IndustrialMaritimeStrategyEISScopingReport.pdf>.

Industrial and Maritime Strategy

SCOPING REPORT

Introduction

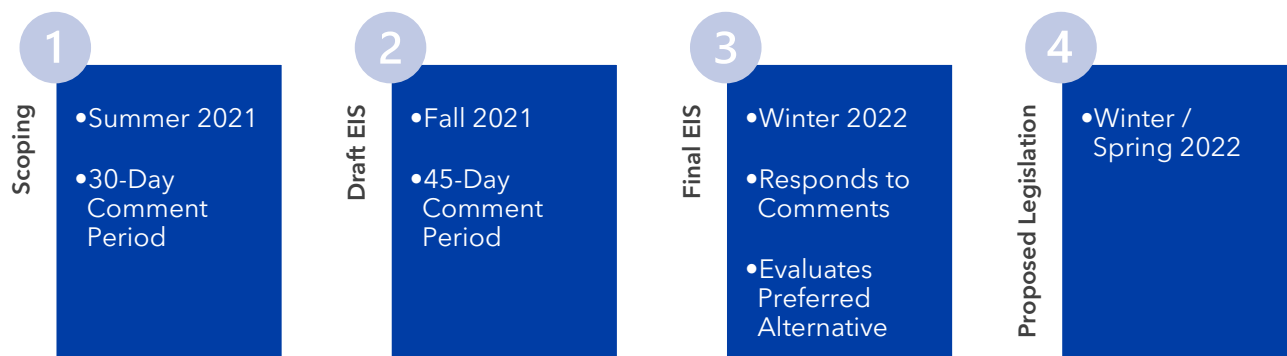
Seattle has planned for maritime and industrial land uses primarily in Seattle’s Greater Duwamish Manufacturing and Industrial Center (Duwamish MIC) and Ballard Interbay North Manufacturing Industrial Center (BINMIC).

With policies that are more than 35-years old, the City of Seattle is responding to changing trends with extensive stakeholder and community engagement and by studying a proposal to update its industrial and maritime policies and industrial zoning. The City of Seattle is evaluating that proposal and alternatives in an Environmental Impact Statement (EIS). Through the EIS the City will identify potential adverse impacts and possible mitigation.

Process

The scoping period is the first step of the EIS process. This period is an opportunity for the public to tell the City what elements of the built and natural environment should be studied in the EIS and to provide feedback on the proposed alternatives for study. The Diagram below shows the steps in the EIS process from the scoping period to the issuance of the Final EIS.

Exhibit 1. EIS Process



Source: BERK, 2021.

This scoping report summarizes comments received during the scoping process and the City’s response to issues raised.

To gather public and agency input into the scope of the EIS, the City issued a scoping notice on July 8, 2021. The notice was published in the Daily Journal of Commerce, the Seattle Department of Construction and Inspections Land Use Information Bulletin, emailed to agencies and interested parties, posted to the SEPA Register, and broadly disseminated through social media. City staff also held informational meetings with several stakeholder groups and organizations. OPCD requested written comments regarding the potential alternatives and elements of environment to be studied be submitted by August 9. In addition to the written comment opportunity, the City offered an online interactive story map and survey. The City also held two informational meetings in a virtual setting on July 21, 2021 at 9 am and July 26, 2021 at 6 pm.

The input received during the scoping period included:

- Written Comments: 105 commenters
- Survey: 46 participants
- Virtual meeting participants: 7 participants

Written Comments

About 105 commenters provided written scoping comments. Most commenters were individuals; some represented governmental agencies, community groups, or property and business owners. Commenters are listed by name below. A summary of comments is provided that consolidates overlapping comments into themes. Original comments are included in their entirety in an Appendix A to this scoping report.

LIST OF COMMENTERS, BY LAST NAME

Achak, Ramin Matthew	Grantham, Michele	Miller, Ashley
Anane, Layla	Greene, Marke	Murdock, Vanessa, Seattle Planning Commission
Aupperlee, Kathryn	Gryniewski, Bruce	Murphy, Colleen
Bergquist, Carl	Hackleman, Rob	Oaks, Stacy, Seattle Cruise Control
Blanchette, Alexa	Hadaway, Shelley	Ossenkop, Alicia
Bleck, Patrick	Hammerberg, Rita	Peach, Allan
Bodnar, Jenni	Hedger, Dustin	Perry, Charles
Boogie, TJ	Hedrick, Josh R.	Pfeiffer, Baily, King County Department of Natural Resources & Parks
Burton, Kimberly	Henzke, Len	Poledna, Aaron
Cannard, Matt	Herzog, Madeline, Vulcan Corporate Properties LLC: 2233 1st Avenue LLC	Quick, Natalie on behalf of NAIOP
Carow, Paul S	Herzog, Madeline, Vulcan Corporate Properties LLC: Cedarstrand Properties LLC	Richard K.
Carow, Patricia C	Hinthorn, Tim	Robinson, Kathryn
Chase, Mackenzie, Seattle Metropolitan Chamber of Commerce	Howard, Lisa Dixon, Alliance for Pioneer Square	Roy, Julie Parisio
Clawson, Jessica M.: Pier One	Johnson, Kathleen, Historic South Downtown	Scharrer, Christine
Clawson, Jessica M.: Port 106 LLC	Kartchner, Dylan	Schwartz, Steve
Corbin, Lisa, Seattle Sports Complex Foundation	Katz, Andy	Seaverns, Glenn
Creal, Case	Kelton, Megan	Shaffer, Brett
Cunningham, Elizabeth	Lau, Wayne	Stafie, Kris
Curtis, Joshua, Washington State Ballpark Public Facilities District	Lavine, Josh	Sundquist, Steve
Dagg, Steve	Le, Nam	Tim Trohimovich, Futurewise
DeBiase, Sofia	Lewis, Elizabeth	Topp, Gina
Dee, Kate	Lewis, Maggie and Bob Huppe	Tucker, Tarrance D., III
Delman, Joel	Little, Jason	Turcotte, Faye
Dickinson, Anne	Livingston, Robert, HomeStreet Bank	Turcotte, Joe
Dickinson, Corey	M <quikwithquip@XXX.com>	Turner, Mark
Dillon, Ann	M <veloslug@XXX.com>	Underwood-Bultmann, Liz, Puget Sound Regional Council
DiMartino, Janie and Nick	MacQuarrie, Irvin	Vanderburg, Julie
Dubicki, Raymond	Main, Bonnie	Vlasaty, Tina
Essa, Ameena	Marti, Miranda, 350 Seattle Maritime Solutions Team	Wakefield, Jill
Farid, M.T.E., P.E., Abdy	McCone, Andy	Weagraf, Sarah
Ffitch, Eric, Port of Seattle: Port Commission	McCray, Glenn, Sports in Schools	Wesselhoeft, Conrad
Ffitch, Eric, Port of Seattle: Stakeholders	McFarlane, Matt	Westerlind, Linnea
Fiorito, Dan	McIntosh, Jennifer	Williams, Dennis
Flanagan, Dani	McNeill, Holly	Wood, Maria
Frishholz, Christine	Menin, Andrea	Wood, Shawn
Goldman, Shana		

Summary of Written Comments

Written comments are summarized in thematic and topical areas, followed by a brief response for how the City has considered the comment theme and how it will be addressed in the EIS.

Environmental Topics

Commenters made suggestions for the environmental topics that should be included in analysis in the EIS. Topics for study that were suggested, sometimes by multiple commenters, include the following:

- **Vulnerable Communities and Equity/Environmental Justice.** Comments suggested the EIS address environmental justice, including historic and continuing environmental and health impacts to vulnerable communities, and that the EIS should include an overview of past and historic land use actions that harmed vulnerable communities or were racially unjust.
- **Greenhouse Gas/Air Quality Approach.** Some commenters suggested that an air quality and greenhouse gas analysis should be included that addresses how regional transportation and tourism, including maritime transportation, contributes to emissions.
- **Climate Change / Sea Level Rise.** Several commenters desired that the EIS thoroughly address climate change and sea level rise.
- **Transportation and Freight.** Comments suggested that the transportation analysis needs to consider all modes of travel in the study area and should also include an analysis of the role that heavy rail plays in the transportation system.

Response - Vulnerable Communities and Equity/Environmental Justice: The EIS will include a review of past plans and policies, including consideration of racial inequities and effects on indigenous peoples. The EIS scope includes an evaluation of the current and future location of land uses, housing, and jobs and the likely impacts related to air, noise, glare, and contamination. The mitigation measures section could identify actions or programs that the City could pursue to address potential impacts on vulnerable populations. The objectives of the proposal include: "Improve environmental health for people who live or work in or near industrial areas – especially at transitions to residential areas or urban villages." Mitigation measures that further equity and environmental justice can be linked to this objective.

Response - Greenhouse Gas/Air Quality Approach: The EIS scope includes air quality and greenhouse gas emissions comparisons due to the future mix of land uses and vehicle miles traveled. Available state or regional inventories, programs, and policies (e.g. ships, freight) can be referenced and included in the analysis to the extent feasible. The City intends to include analysis on the effect of electric shore power and other fleet electrification efforts on emissions. In response to this area of comment the City will include as an integrated part of the proposal a new Comprehensive Plan text policies about electrification in one or more of the action alternatives. Additionally, the mitigation measures section could identify actions or programs that the City could pursue to address potential greenhouse gas and air quality impacts.

Response – Climate Change / Sea Level Rise: The EIS scope includes an evaluation of sea level rise and climate change potential under each of the alternatives. The EIS will include a baseline of expected changes to climate and future sea level rise and will include discussion of how these changes will affect industrial lands for each alternative.

Response - Transportation: The transportation analysis will include all known or planned transportation infrastructure changes that will occur during the EIS’s time horizon. The transportation evaluation will consider changes in the study area in the context of citywide traffic trips using the citywide traffic model. Heavy rail will also be considered in the EIS.

Housing / Economics

Commenters made several suggestions related to housing and economics. Many of these suggestions were for features that commenters wished to see in the proposal. These suggestions include:

- **MIC boundaries.** Some commenters suggested industrial land / MIC boundaries should be retained, while others wished to retain the current practice of allowing MIC boundary changes through the annual amendment process.
- **Transit Oriented Development (TOD) / Housing.** Some commenters suggest the City should study traditional TOD around transit stations that would include housing. Some felt that due to housing affordability considerations or particular site considerations, the City should allow for more housing. Other commenters believe that housing is incompatible with industrial areas and expansions of housing allowances should not be studied.
- **Consistency with regional plans.** Some commenters emphasized that the proposal should ensure consistency with regional plans and policies for growth including the VISION 2050 plan and the Puget Sound Regional Council’s (PSRC) MIC subarea plan requirements.
- **Industrial definitions.** Several commenters argued that the nature of industry is changing and the city should reevaluate what it considers industrial activity.
- **Employment projections.** Commenters suggested that the alternatives should include projections for the amount and type of future employment.
- **Economic feasibility or market analysis.** Some commenters expressed concerns that some of the land use concepts may not be economically feasible and the City should conduct economic feasibility analysis to ensure zoning changes are viable for development.

Response -MIC Boundaries: The City anticipates considering whether to limit MIC Boundary changes to the Comprehensive Plan Periodic Review (next in 2024) or allow it as part of its annual docket process. This policy option is part of the proposal under study. Final decisions by the Mayor and Council would decide whether to implement such a policy change. Alternatives 3 and 4 in the proposal include minor changes to MIC boundaries.

Response - Transit Oriented Development / Housing: Consistent with the PSRC criteria for designating Manufacturing Industrial Centers to focus industrial uses in the MIC, the EIS will not study allowing residential uses in majority of the study area. EIS alternatives include range of additional employment densities at existing and future light rail stations with a focus on a land use concept of transit-oriented employment or industrial TOD. To ensure consistency with PSRC Regional

Centers criteria, the focus of land uses in the study area are non-residential. Alternatives 3 and 4 considers limited additional flexibility of existing allowances for Artist/Studio Housing and Caretakers Quarters housing in the proposed Urban Industrial zone only. The amount of housing varies from 600 to 2,200 industry supportive units between Alternatives 3 and 4 and the EIS will study the impact of that housing on all elements of the environment including land use compatibility. Final calibration of standards may be informed by the EIS and related studies.

Response - Consistency with Regional Plans: The EIS will address the policy framework for MIC designation including the Growth Management Act (GMA) and PSRC Vision 2050. The land use section of the EIS will also address the role of the Container Port Element of the Comprehensive Plan. The EIS and planning effort leading to a legislative recommendation will be consistent with subarea planning guidance from PSRC. The EIS will study applicable PSRC Regional Centers Framework and its MIC standards to retain a large majority of study area land in industrial use.

Response - Address Industrial Definitions: The EIS will include study of revised zones (MMI, II, and UI). The EIS will help the City eventually develop a proposal that will identify the specific zones standards including uses.

Response - Employment Projections: The EIS and related studies are anticipated to consider accessibility to a range of job types and quantities, and this will form the basis to compare impacts between alternatives. For each alternative, the EIS will include a numerical projection for jobs by sector and subarea within the study area through 2044.

Response - Economic Feasibility or Market Analysis: SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). Separate from the EIS, the City will consider economic feasibility information in preparation of any zoning change and/or Comprehensive Plan change proposal.

Property Requests

Some commenters made suggestions for zoning or comprehensive plan designation change that should be included for study for certain specific properties. Suggestions for specific sites and areas are summarized in Exhibit 2.

Exhibit 2. Property Requests

Issue	Response
<p>About 76 comments supporting removal of land from the MIC adjacent to SW Harbor Blvd and T5 to support development of Seattle Sports Complex. Alternatively, they suggested increasing the maximum size of use limit for indoor recreation facilities.</p>	<p>The City will study an increase in the maximum size of use for indoor recreation uses in one of the action alternatives.</p>
<p>Remove more land from MICs. Locations suggested in Ballard, W. Armory Way, Pier One. Expand Seattle Mixed (SM) to more areas. Consider prior EIS for Terminal 5. Study impacts of redevelopment options other than proposed in the alternatives.</p>	<p>The City of Seattle, as the Lead Agency, has the prerogative to define the range of alternatives it studies in the EIS.</p> <p>The EIS represents an implementation action of the recently completed Industry and Maritime Strategy and the alternatives are heavily informed by the recommendations of that strategy, including adding no significant new housing in industrial areas.</p> <p>The EIS will also include proposed Comprehensive Plan amendments that implement the Industry & Maritime strategy, including policies related to establishing new zone classifications, master planning future redevelopment of the Interbay Armory and WOSCA sites, removal of targeted areas of Georgetown and South Park from the MIC, and the timing of Comprehensive Plan amendments that removes land from MICs.</p> <p>The EIS will consider a policy to allow for MIC boundary adjustments during the periodic review or during the annual amendment process.</p> <p>The EIS may consider prior SEPA documents prepared by the City or other entities, but the EIS will focus on the programmatic implementation of the Industry and Maritime Strategy.</p>
<p>The project overview makes assumptions about future redevelopment of T46, the Coast Guard Facility, and the Interbay Armory that are premature.</p>	<p>None of the EIS alternatives includes an analysis of different land uses on the referenced sites. The project overview describes potential redevelopment projects that based on current information are reasonably foreseeable. Any change in land use on these sites would be the result of processes outside the scope of this EIS. This project does include language related to master planning at the WOSCA and Armory sites, but that is simply to establish the City's role in any future discussions of land use on those sites.</p>

Issue	Response
Armory	The proposal includes a policy change calling for collaborative master planning of the Armory site. The site is within the MIC, and the proposal is that updated MIC policies and industrial zone designations will apply to the site. Should the State and partners wish to pursue non-industrial future uses, that would have to be determined through a master planning process in partnership with the City and other entities and would be the subject of a separate environmental review.
Fiorito properties one half block located in the Ballard Interbay MIC. This block abuts the border of the BINMIC.	The properties are studied for Urban Industrial in both Alternatives 3 and 4. These alternatives including differing allowances for industry-supportive housing.
Cederstrand Properties – This property is just south of the Stadium District.	Alternative 4 extends the Urban Industrial zone south along 1st Ave. S. as far as S. Stacy St. and would abut the Industry and Innovation zone in this option.
Urban Industrial (UI) as described, is inappropriate for the Stadium District.	The comment is noted. See the discussion of the Stadium District in the proposed Industrial and Maritime Strategy.

Process

Some commenters were concerned about the timing of the DEIS issuance and comment period overlapping that of the Sound Transit West Seattle and Ballard Link Extension DEIS also anticipated to be issued in late 2021.

Response – Process: The Sound Transit EIS is a different proposal from the Industrial Maritime Strategy. City staff are coordinating information and data from Sound Transit to the greatest extent possible. City staff understand the time and challenge of preparing EIS comments. City staff are coordinating with Sound Transit and striving to avoid overlap of DEIS comment periods. In the range of alternatives, the proposed land uses are informed largely by the expected future transit stations.

Survey Responses

During the scoping period a survey was available on the project website and story map, using the platform Survey Monkey. The survey asked twelve questions. 44 people responded to the survey, and about 35 people completed the survey entirely. A brief summary of the responses is provided here and the full extent of the survey responses is included in Appendix B.

The first question asked about the environmental topics that should be included for study. The top response receiving 20 responses was Air Quality and Greenhouse Gases, followed closely by Transportation and Contamination that received 19 responses. Land and Shoreline Use received 17 responses. 11 other topics received ten or fewer responses.

Questions 2 – 5 asked responders to comment about what they liked or didn't like for each of the proposed alternatives.

For the No Action Alternative, some appreciated the current Comprehensive Plan and zoning for its maintenance of industrial and maritime uses and development standards in the MICs while others do not like retaining the No Action Alternative. Suggestions for change included allowed land uses either inside the study area or adjacent (e.g. allow more housing adjacent to the study area to live near work or changes in West Seattle), or improved environmental or development standards, alternative transportation standards, etc. Questions about the No Action Alternative addressed economics, taxes, and the usefulness of this alternative. It should be noted that the No Action Alternative is required to be studied by the State Environmental Policy Act (SEPA).

For the Future of Industry Limited (Alternative 2), some commented that the alternative is aligned with the proposed Industrial and Maritime Strategy and is more protective of the industrial uses. Some would like to see an even higher share of industrial uses and less non-industrial uses, while others would like to see more housing. Some would like to see more mitigation, e.g. past contamination. Some wanted information on feasibility.

For the Future of Industry Targeted (Alternative 3), some appreciated the rethinking of uses near transit, as well as supporting primary industrial uses and limiting housing. Some wanted more housing or mixed uses. Some were concerned about focused removals of land from the MIC. Comments also addressed the need to consider climate change, sea level rise, and trees.

For the Future of Industry Expanded (Alternative 4), some liked the expanded allowances for housing and adjustments to MIC boundaries in Georgetown and South Park. Some were still concerned about jobs/housing and commuting, and others did not like the approach to housing and less protection for industrial. Comments also addressed the need to consider contamination. Some thought the distinction between alternatives was not easy to discern.

Questions 6 – 10 asked about how the responders experience or use the study area, and demographic information about the responders.

When asked how they experience the study area:

- 78% go to shops, office, or services in one of the areas
- 44% live near an industrial area
- 30% work at a business in one of the areas
- 12% own a business in one of the areas

When asked where they lived, the highest volume of responses were from the West Seattle and Delridge areas. Aside from those, numerous other areas of the city were represented with two or less. West Seattle was also the most common work location for responders.

Nearly two thirds of the responders identified as White and about 10% as Hispanic/Latinx. 21% of responders were 35-44 years of age, 30% were 45-54 years of age, and 26% were 55-64 years of age.

Question 11 was a final open ended question allowing respondents to share anything else on the Industrial and Maritime Strategy. Some identified properties of concern, some wanted to

emphasize the need to protect industrial uses from encroachment, some identified environmental justice topics, and others reflected on availability of land for the range of industrial uses.

Stakeholder Informational Meetings

During the scoping phase City staff held virtual information meetings or telephone calls with individuals and stakeholder groups known to have an interest in topics that would be addressed in the EIS. Stakeholder meetings included an overview of the EIS process and general two-way discussion of maritime and industrial strategy topics. Some participants in these meetings later submitted written scoping comments. City staff gained an understanding of issues of interest through the stakeholder meetings. Meetings with the following groups were held:

- Burlington Northern Santa Fe (BNSF)
- Chinatown / International District Public Development Authority (SCIPDA)
- Duwamish Tribe
- Fremont Dock Company
- Futurewise
- Georgetown Community Council
- GotGreen Seattle
- Group meeting with heads of labor organizations
- Historic South Downtown
- Housing Development Consortium
- National Association of Investment and Office Properties (NAIOP)
- North Seattle Industrial Association (NSIA)
- Seattle 350 / Seattle Cruise Control
- Seattle Jobs Initiative
- Seattle Planning Commission staff
- Share the Cities / The Urbanist
- South Park Neighborhood Association / SPARC
- Union Pacific Railroad
- Vipond Group

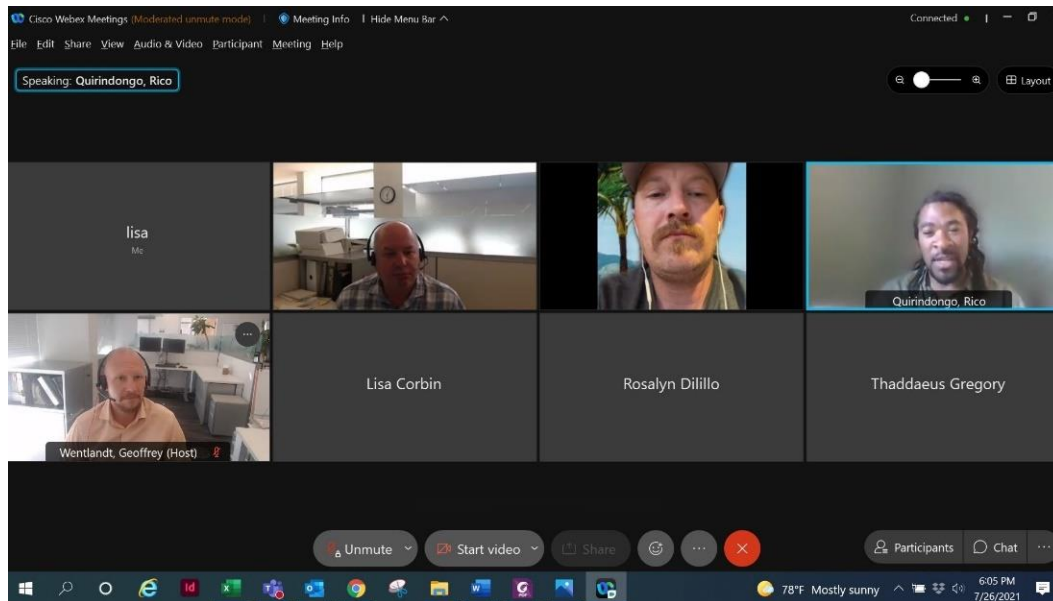
Public Meetings

Two one-hour virtual workshop sessions were scheduled on July 21 (9am) and July 26 (6 pm). There were about 7 participants beyond city staff and consultants. The primary purpose of the meetings was to share the Industrial and Maritime Strategy, the EIS Scoping process and how to comment, and to allow for participant questions.

Comments and Questions:

- A commenter asked if the City was aware of where employees in industrial areas reside, and if commutes to work would be considered. The commenter suggested that employees in the study area should be engaged in the process.
 - *Response – Engagement:* There are multiple opportunities for engagement in the EIS process and subsequent decision making processes. The City is committed to proactive outreach to those who may be affected, or are traditionally excluded from government processes. Outreach will occur through numerous methods including social media, one on one meetings, community meetings as requested, and targeted contacts with stakeholders including labor organizations and others. There will be a formal public comment period and public hearing following release of the Draft EIS. There will be additional engagement, including comment periods for any future land use or policy changes resulting from this study.
- A commenter asked staff whether different future land uses could be considered for the Harbor Boulevard Site in West Seattle. The commenter and members of her group would like to see land use regulations that would allow for a larger sized athletic / tennis center at the property.
 - *Response – Harbor Blvd. Site:* In response to the comments about the Harbor Boulevard Site, Alternative 4 will study modification of the maximum size of use limit for sport and recreation uses to allow larger sized sports and recreation facilities.

Exhibit 3. Screenshot of July 26, 2021 Virtual Meeting



Source: City of Seattle, BERK 2021.