

Holmes, Jim

From: Nancy Sackman <nancys@duwamishtribe.org>
Sent: Tuesday, March 01, 2022 3:09 PM
To: PCD_Industry_and_Maritime@seattle.gov
Cc: Holmes, Jim; Cecile; Russell Beard; Tribal Administration
Subject: Duwamish Tribe's Comments on DEIS
Attachments: duwamishTribecommenSeattleIndustrialMaritimeStrategyDEIS.pdf

CAUTION: External Email

Hello Jim,

Attached is the Duwamish Tribe’s comment on the Seattle Industrial and Maritime Strategy. We have also included a letter from Seattle Green Spaces Coalition.

I included your email since I received a hard copy of the letter of notice, and it was difficult to see the underscores on the PCD email. I hope they are underscores!

Thank you, Nancy Sackman.

Nancy Sackman - Assistant to the Longhouse Director

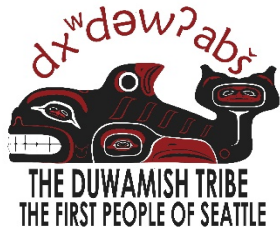
Duwamish Tribal Member

Former Council Member

[Stand with the Duwamish — Duwamish Tribe](#)

206-431-1582 ext 102

Office Hours Tues - Saturday





March 2, 2022

Seattle Office Planning & Community Development
600 4th Ave. Floor 5
P.O. Box 94788
Seattle, WA 98124-7088

Subj: Call for Public Response Re: Environmental Impact Statement (EIS) for the Seattle Industrial & Maritime Strategy.

Dear Seattle Office Planning & Community Development:

As the Tribal Council Chair for the Duwamish Tribe of Seattle and the six hundred enrolled members, we welcome the opportunity to respond to the project for public review entitled ***“Environmental Impact Statement (EIS) for the Seattle Industrial & Maritime Strategy.”*** After review of the document by our tribal environmental consultants, we have five comments for the City of Seattle to consider regarding the proposed actions and alternatives the document describes. Our comments are guided by our most recent Strategic Plan which addresses our governmental role, community development initiatives, promotion of cultural and educational programs, and historic place-based environmental justice interests and stewardship efforts for the Duwamish Tribe and Duwamish Tribal Services. Additionally, as the City further develops its Industrial and Maritime Strategy, the Duwamish Tribe appreciates the inclusion in the process and will remain actively involved and would like to explore the possibilities for a community benefits agreement which could optimally align and clarify the various interests of our Tribal government along with other tribes, the City of Seattle, Port of Seattle, and other nongovernmental groups. We provide our comments in bulleted format below:

1-1

- The Duwamish Tribe strongly supports the development and implementation of the Urban Industrial (UI) complex designed for increased employment and entrepreneurial opportunities. The creation of the Urban Villages and mixed-use communities is sorely needed and reflects an effort to address social and economic disparities currently found in a demographically diverse and until now, underrepresented community in Southwest Seattle. The development of the UI ensures stronger land use protections for core industrial and maritime areas; encourages modern high density industrial development in safe designated walkways near public transit; and creates affordable opportunities for small scale light industrial business

1-2

THE DUWAMISH TRIBE
4705 WEST MARGINAL WAY S.W., SEATTLE WASHINGTON 98106-1514
PHONE: (206) 431-1582 | FAX (206) 431-1962

- The Duwamish Tribe supports the SODO/Stadium Urban Industrial Zone (UI) and strongly recommends an amendment of the comprehensive plan to expand the current footprint of the designated Urban Villages beyond the 6% allotment described and to include Duwamish Greenbelt properties adjacent to or contiguous to the Duwamish Longhouse and Cultural Center, Ha Ah Poos Park and Herring House (see Exhibit 1.5-11 Alternative 3-Future of Industry Targeted pg. 1-25). Additionally, the establishment of an Urban Village complex in this locale would include a dedicated pier side presence on the Duwamish River for the Duwamish Ecotour Kayaking Tours. It is important that the Duwamish River and its immediate surroundings be allowed to return to its natural state and have a 200-foot buffer on each side for vegetation and meandering purposes. This buffer helps to mitigate seasonal urban flooding and allows for aquatic life to thrive. Currently the designated boundaries for the UIs in the Sodo Stadium boundary range from 2 to 2.5 miles at their closest locations to the Duwamish Longhouse.

1-3

1.7.11 Historic, Archaeological, & Historical Resources

- The Duwamish River and its ancestral people who continue to reside in the area today, are located within two of the industrial land subareas, the SODO Stadium and Georgetown areas. The Duwamish Tribe requires Alternatives 1-4 outlined in the EIS adhere to and follow standard archaeological techniques in the discovery and preservation of cultural and historical artifacts related to the Indigenous tribes historically associated with these articles and their release to the proper tribes including the Duwamish Tribe at the Duwamish Longhouse & Cultural Center. In addition to these two subareas, the Duwamish had known village sites near Ballard and at the shores of what is now downtown Seattle on Elliott Bay. We consider these areas culturally significant with a high probability to have unknown archeological deposits. These sites are where the Duwamish fished, hunted, gathered camas roots, tule, cattails, berries, and other native plants to maintain our way of life. Near the turn of the 20th century, resurfacing of the landscape by European settlers affected our waterways and drastically changed aquatic life and resources for the Duwamish. The Montlake Cut lowered the Big Lake (Lake Washington) significantly so that the Black River has all but dried up and reduced the salmon run. Straightening of the Duwamish also destroyed integral places (bends and brackish ponds) for salmon to acclimate to salt water before heading out to sea. Small streams were buried further depleting places for salmon to spawn. Native plants that once covered the areas are overgrown with invasive plant species such as ivy, holly, and blackberry bushes. These invasive species reduce diversity of food sources and attract nonnative birds and non-native pollinators to the area. Because of these changes the Duwamish are a marginalized tribe today and it is now more important that the Duwamish continue its native traditions. In the mid-1970s the archeological site, Duwamish Number One Site designated 45-KI-23, was discovered in the former Duwamish River Estuary located at həʔapus Park, formerly T107 Park. The artifacts are evidence that the Tribe existed archaeologically and thrived with the resources on hand that along the estuary and the immediate vicinity. The site is directly across from the Duwamish Longhouse built in 2009. The Tribe emphatically reiterates that we should be allowed access to the areas listed in the statement to preserve our archaeological and historic records, and resources to pass down our

1-4

Tribal knowledge to our future generations. Therefore, any earthwork or groundwork performed in these areas, we request notification in the way of an archeological investigation and any evidence gathered within these areas be presented and turned over to the Duwamish Tribe at the Duwamish Longhouse & Cultural Center.

2.2.2 Equity and Environmental Justice

- The EIS has nineteen citations related to Environmental Justice and Equity that identify community standards, guidelines, regulations, and policies in place to address equity across the communities to meet mandates moving forward. The document cites remediation strategies in three places; pages 3-131 (twice); and 3-543. Citation's reference "The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)," new construction site cleanup will be required, and lastly, NDS Partnering that entails reconstructing City rights-of-way to manage flow and supply water quality treatment for urban runoff. There is no mention in the draft of environmental justice to the populations of West Seattle, South Park, Georgetown, White Center, or the Duwamish River Valley at large. The quality of life in these areas have been affected by the straightening and dredging of the last mile of the Duwamish River, industrial pollution of the water, and the dumping of toxic cement kiln dust to stabilize the slopes of the ridges in West Seattle. The lack of an EIS strategy for the remediation of existing contaminated properties within the boundaries of Seattle's industrial and maritime sectors is incomprehensible. The Tribal Council believes it is necessary and right for the Development Authority to include EIS strategies addressing remediation of properties within the MIC boundaries prior to, and during future development that may not be considered otherwise. For example, within a three-mile radius of the Duwamish Longhouse and Cultural Center, the Washington State Department of Ecology identifies 626 contaminated sites (See <https://apps.ecology.wa.gov/neighborhood/>) The Duwamish Greenbelt and SW Seattle population are underrepresented regarding City environmental services readily available to other Seattle communities.

1-5

Chapter 3 Environment, Impacts, & Mitigation Measures

- The Duwamish Tribe is in support and solidarity with neighborhood associations located in the Duwamish Greenbelt regarding the extension of light rail onto the Greenbelt and include the attached letter from the Seattle Greenspaces Coalition www.seattlegreenspacescoalition.org at their request and with our full support. The extension of light rail into Greenbelt greenspaces sacrifices an already at-risk green environment used by the community and the larger Seattle population.

1-6

Respectfully,



The Honorable Cecile Hansen, Chairwoman of the Duwamish Council



SEATTLE GREEN SPACES COALITION
www.seattlegreenspacescoalition.org

February 2, 2022

Board of Directors
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Re: Do not destroy Pigeon Point forest; consider alternative West Seattle transportation proposals

Dear Sound Transit Board Members,

The north Pigeon Point green belt is historically important to [the Duwamish people](#), and to [Olmsted Brothers' plans](#) for adding to our Seattle Park system. Also called the Duwamish Greenbelt, it is a forest area that runs along West Marginal Way and wraps around the north end of Pigeon Point. It is home to a heronry (7-10 active nests), habitats for other birds, insects and animals, hiking trails, and large numbers of healthy trees.

Most of the West Seattle light rail routes Sound Transit proposes will wrap around Pigeon Point and destroy a large portion of that greenbelt. This would create a permanent loss of natural capital (green infrastructure), and an equity issue for the Duwamish Tribe and the Pigeon Point community. Seattle's Urban Forestry Commission reports net tree loss for the city every year, vs. the city's goal of annually adding tree cover. Removing more trees is not a healthy, sustainable or equitable action for Sound Transit to take.

We urge Sound Transit to avoid causing that damage, by examining other light rail routes, or other modes that could be used. Sound Transit stated last year that all future projects will be viewed through an equity lens. Its West Seattle light rail proposals run counter to that goal, as they impact Duwamish shoreline areas and uphill green spaces, interfere with local businesses, and displace 100-200 people from their homes. These would appear to qualify as future project equity issues, since Sound Transit does not expect to deliver its light rail system until 2032. Please let us know if the agency is seriously considering these environmental and equity impacts.

All the best for the new year,

Mary Fleck, Elaine Ike, John McNulty, Michael Oxman, Peggy Sturdivant
Seattle Green Spaces Coalition Board / <https://seattlegreenspaces.org>

Holmes, Jim

From: Balogh, Eloise <BaloghE@wsdot.wa.gov> on behalf of Cotten, Mike <CotteMi@wsdot.wa.gov>
Sent: Tuesday, March 01, 2022 9:08 AM
To: Wentlandt, Geoffrey; PCD_Industry_And_Maritime_Strategy
Cc: Meredith, Julie; Judd, Ron; Mayhew, Robin; Bartoy, Kevin; Kukes, Cameron; Kucharski, Margaret; Storrar, Jeff
Subject: Draft Environmental Impact Statement for Seattle's Industrial and Maritime Strategy
Attachments: 02.28.22Seattle_Ind-Maritime_DEIS_Letter.pdf

CAUTION: External Email

(Electronic Transmittal Only)

Mike Cotten, PE, DBIA
Regional Administrator, NW Region
Washington State Department of Transportation
(206) 440-4693 office

February 28, 2022

Submitted via: PCD_Industry_And_Maritime_Strategy@seattle.gov

City of Seattle
Planning and Community Development
Attn: Mr. Geoff Wentlandt
P.O. Box 94788
Seattle, WA, 98124-7088

RE: Draft Environmental Impact Statement for Seattle's Industrial and Maritime Strategy

Dear Mr. Wentlandt,

Thank you for the opportunity to provide comments on the City of Seattle's Draft Environmental Impact Statement (DEIS) for its Industrial and Maritime Strategy. WSDOT appreciates the positive and collaborative relationship that our agencies have shared for a considerable amount of time and recognizes the importance of the city's lands within the Manufacturing Industrial Centers (MICs) being studied. These MICs serve as regional job centers that currently house nearly 100,000 jobs and are expected to be home to another 23,500 to 59,200 (depending on alternative) by year 2044. In the interest of further collaboration and engagement in the planning process for these MICs, WSDOT submits the following comments:

2-1

Traffic

- The DEIS uses October 2019 data to assess existing conditions. On February 4th, 2019, the SR 99 Alaskan Way Tunnel opened as an untolled facility open to all traffic. The same year on November 9th, tolling commenced of the SR 99 tunnel. WSDOT requests that these events and their effect on trip patterns be considered.

2-2

Demand Management

- Alternatives 3 and 4 propose Industry & Innovation (II) and Urban Industrial (UI) areas within SODO and Georgetown as identified in exhibits 2.4-18 and exhibit 2.4-24. In section 3.10.3 Mitigation Measures, the Travel Demand Management (TDM) subsection provides an opportunity to tie TDM strategies to the specific areas highlighted in the exhibits where land-use activity is proposed to increase. WSDOT would suggest that the EIS include specific measures to manage demand and strategies to supplement transit in these areas.

2-3

Mitigation

- The DEIS identifies potential impacts to I-5 for alternatives 3 and 4 that may warrant mitigation. As the alternatives are further considered and mitigation measures refined, the city should engage directly with WSDOT to partner on developing the appropriate strategies and measures.
- State Routes 99, 599, and 509 are parallel/alternate routes to I-5 that adjoin the MICs. As the alternatives are considered further, the city should investigate the transportation impacts to these state routes resulting from the city's land use plan under the Industrial and Maritime Strategy. For more information on land use proposals and vehicular trip thresholds, please see WSDOT Design Manual Chapter 1130.09(2)(a).

2-4

Land Use

- WSDOT's Corson Facility is located at 6413 Corson Ave South within the study area. This property is home to many of WSDOT's essential activities needed to keep our emergency response crews running, maintenance and preservation efforts ongoing, and vehicle fleets maintained.

All three alternatives being considered would designate this property as Urban Industrial (UI), which is intended to allow a mix of local manufacturing, production, arts while creating a sense of place. This UI designation could also allow a limited amount of new industry-supportive housing. In addition, Alternative 3 and 4 would zone an area just north of the Corson Facility as Mixed-Use Commercial. This land use designation would allow a mix of complementary uses such as residential, retail, commercial, employment, civic and entertainment uses in close proximity.

2-5

WSDOT supports the city maintaining land use designations in and around the Corson Facility that ensure its long-term operation. We have concerns with any land use action or strategy that would result in the Corson Facility becoming a nonconforming use once adopted. We also have concerns regarding the potential for residential encroachment on the Corson Facility given the provision under the UI designation that would allow for housing within and around the property. We would recommend the city evaluates and documents the potential for residential encroachment on existing industrial operations that may be prone under the alternatives.

In addition, WSDOT has concerns with the designation of Mixed-Use Commercial area in such proximity to the Corson Facility and other major industrial uses in the area. If this designation is pursued as alternatives are further pursued, WSDOT would recommend the city include an evaluation of the potential for conflicts and safety concerns between non-motorized travel resulting from the mix of uses and the existing industrial uses and associated heavy truck and vehicle traffic.

2-5 cont.

As mentioned previously, WSDOT appreciates the collaborative relationship with the city and is interested further collaboration and engagement in the planning process of the city's MICs. We look forward to partnering with the city and furthering the dialog of appropriate mitigation strategies and measures as they relate to WSDOT's facilities through the environmental process. Please feel free to contact Jeff Storrar (WSDOT Policy Manager) at storraj@wsdot.wa.gov, or 206.714.9456, with any questions or future correspondence.

2-6

Sincerely,



Mike Cotten, PE
Regional Administrator
Northwest Region

cc: Julie Meredith, WSDOT
Ron Judd, WSDOT
Robin Mayhew, WSDOT
Kevin Bartoy, WSDOT
Cameron Kukes, WSDOT
Margaret Kucharski, WSDOT
Jeff Storrar, WSDOT

Holmes, Jim

From: Joshua Curtis <curtisj@ballpark.org>
Sent: Wednesday, March 02, 2022 4:07 PM
To: PCD_Industry_And_Maritime_Strategy
Cc: John Marchione; Wentlandt, Geoffrey
Subject: PFD and PSA Comments on Industrial and Maritime DEIS
Attachments: PFD_PSA Comments on City's DEIS for Industrial Lands Proposals_Final.pdf

CAUTION: External Email

Dear Responsible Official:

On behalf of the Boards of Directors for the Washington State Ballpark Public Facility District and Washington State Public Stadium Authority, we respectfully submit our comments regarding the City’s Industrial and Maritime Strategy Draft Environmental Impact Statement. We appreciate the City’s hard work on this topic and its consideration of our feedback.

Sincerely,

Joshua Curtis (PFD) and John Marchione (PSA)



Joshua Curtis (he, him, his)
Executive Director

Direct: (206) 664-3079 | Cell: (206) 853-8571
PO Box 94445 | Seattle, WA 98124
www.ballpark.org



March 2, 2022

City of Seattle
Office of Planning and Community Development
Attention: Geoff Wentlandt, Project Manager
P. O. Box 94788
Seattle, WA 98124-7088

Via Email: Geoffrey.Wentlandt@seattle.gov

Re: Industrial and Maritime Strategy DEIS Comments

Dear Responsible Official:

The Washington State Major League Baseball Stadium Public Facilities District (PFD) and the Washington State Public Stadium Authority (PSA) appreciate the opportunity to comment on the draft environmental impact statement (DEIS) for the City's Industrial and Maritime Strategy. As you know, the PFD is the public entity that developed and owns the ballpark known as T-Mobile Park and the PSA is the public entity responsible for the development and oversight of Lumen Field. The PFD and PSA watch over these public assets to ensure that the public's investment in these facilities is maintained and enhanced.

The PFD and the PSA have been active participants for over a decade in several City-led processes to develop an Industrial and Maritime Strategy, with a strong focus on the Stadium Transition Area Overlay District (STAOD). Most recently, we engaged with Mayor Durkan's Maritime and Industrial Advisory Group and, with significant reservations about the financial feasibility of specific housing restrictions yet to be studied, supported the Mayor's recommendations to City Council. We have advocated for reestablishing light industry in the stadium area, creating opportunities for an equitable economic recovery, and promoting public safety, all while protecting Seattle's existing industrial and maritime activities in the Duwamish. We have also advocated for the thoughtful inclusion of housing into the STAOD, which we believe is crucial to achieve those goals and to create a healthy transition area between the heavier industrial uses to the south of the STAOD and the neighborhoods of the Waterfront, Pioneer Square and the Chinatown International District.

While the majority of our attached comments focus on the content of the City’s DEIS, we start with a more fundamental request: remove the STAOD from the Duwamish Manufacturing and Industrial Center (MIC) entirely. This is the proposal that we submitted to the City Council as a formal Comprehensive Plan amendment in 2019, which was shelved until a thorough review of all industrial lands could be done through Mayor Durkan’s recent process. Almost three years later, we still find no compelling reasons to classify the land around the stadiums as being part of an industrial center.

Our small, self-contained area around the stadiums – created in 2000 by the City – draws approximately seven million visitors per year and, driven by the high price of land, has almost no industry left. In addition, unlike the rest of SODO, the area is zoned for commercial uses (such as offices), benefits from an expanding transit system, and it directly abuts the Pioneer Square, Waterfront, and Chinatown International District neighborhoods.

In a public poll commissioned by both of our organizations in the spring of 2021, we found that 87% of registered voters favored the inclusion of residential uses in this area. With a housing crisis at the top of the issues facing the City and the worthy goal of creating tens of thousands of new industrial jobs, we must not lose the opportunity to create a thriving, economically viable, mixed-use area adjacent to the stadiums that both delivers needed housing and restores light industry to the area.

Both of our organizations are committed to partnering with the City and other stakeholders to identify an appropriate zoning framework for this area, along with seeking funding for continued transportation investments necessary to ensure the viability of the freight corridor while accommodating fans, workers, and residents.

While making this request, we also remain constructive partners with the City and, to that end, have included our comments on the DEIS herein. Given our contention that housing is the economic engine that will fund affordable maker spaces, it is important to understand how much housing is needed to subsidize these maker spaces and whether it is also possible to create a public benefit by requiring some level of affordability for the housing.

To that end, we engaged Heartland LLC to analyze the financial feasibility of a range of development concepts that may result from changes in land use policy. We see this analysis as central to whether a new Urban Industrial Zone can be realized. As such, we are also appending to our comments Heartland’s report and ask that the City treat this document as part of our public comment on the Draft EIS.

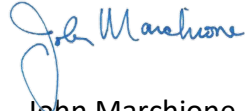
Thank you for considering our comments.

3-1
cont.

Sincerely,

A handwritten signature in black ink, appearing to read 'JC' with a stylized flourish.

Joshua Curtis
Executive Director, Washington State
Ballpark Public Facilities District

A handwritten signature in blue ink, appearing to read 'John Marchione'.

John Marchione
Executive Director, Washington State Public
Stadium Authority

PFD/PSA Comments on City’s DEIS for Industrial Lands Proposals

1. In 2000, the City of Seattle created the Stadium Transition Area Overlay District (STAOD). This district was created to recognize its unique characteristics, unparalleled in Seattle: home to two, large sports stadiums and an events center, situated adjacent to downtown and two historic neighborhoods, while also serving as the gateway to the Duwamish Manufacturing and Industrial Center and the southern terminus of the central waterfront. This small, self-contained area around the stadiums draws approximately seven million visitors per year and, driven by the high price of land, has almost no industry left in it. In addition, unlike the rest of SODO, the area is zoned for commercial uses, such as offices, and it benefits from an expanding transit system.

The City’s Comprehensive Plan in LU 10.1618 states: “Prohibit uses that attract large numbers of people to the industrial area for nonindustrial purposes, in order to keep the focus on industrial activity and to minimize potential conflicts from the noise, nighttime activity, and truck movement that accompanies industrial activity”. The existence of two large sports stadiums and an event center that draw large numbers of people to an industrial area is in direct conflict with current policy.

What’s commonly referred to as the Pioneer Square panhandle divides the STAOD from Railroad Way to Royal Brougham and is zoned Pioneer Square Mixed, as is the North Lot immediately adjacent to Lumen Field. This zoning designation allows residential. As a result, the general area around the stadiums has retail, office, hospitality, residential and general commercial that make up most of the existing square footage.

The Puget Sound Regional Council (PSRC) has stated that removing the STAOD from the Duwamish MIC would make the MIC perform better relative to criteria set forth for MICs and it would eliminate incompatibilities in local and regional policies regarding housing in MICs.

The final EIS should study the impacts of removing the STAOD from the Duwamish MIC as a separate, reasonable alternative.

2. The Stadium area's unique characteristics have been lost and obscured in the City's current, broad-based industrial lands proposals that stretch over all of Seattle. Simply calling out the stadium area in the title "SODO/Stadium " is not satisfactory in terms of recognizing its unique characteristics. The STAOD has almost nothing in common with the bulk of SODO. The final EIS should analyze impacts in the STAOD, distinct from the balance of SODO, related to:
 - a) Transportation
 - b) Housing
 - c) Land Use3-3

3. Specifically, the "No Action" alternative would result in a full buildout of mid-rise office buildings in the STAOD, with its IC zoning, because that would maximize the return on that land under current zoning. The DEIS, in section 1:19, recognizes this by stating that "IC has been developed primarily with office and commercial uses". But the DEIS fails to evaluate how that would compare with mixed-use scenarios that include housing, which we believe would actually reduce transportation impacts. In line with our request under 2 above, the final EIS should analyze the traffic impacts from an office buildout in the STAOD under the No Action alternative as compared to other alternatives.
 3-4

4. The DEIS analysis does not address the impact of residential as an allowable use in the new Urban Industrial Zone on transportation. Instead, it heavily focuses on the impacts of tens of thousands of new jobs on transportation. The final EIS should specifically focus on any potential transportation impacts from residential uses being allowed in the new Urban Industrial Zone, if any.
 3-5

5. Transportation: Existing conditions on Royal Brougham and Edgar Martinez Way operate at LOS F. The final EIS should evaluate the marginal impact of adding residential uses to the STAOD, if any, particularly compared to a full office buildout under the No Action Alternative.
 3-6

6. The City's proposals fail to explain why housing needs to be so severely restricted in the area immediately adjacent to the stadiums, given the significant residential housing already in the neighborhood, including the 240-foot tall residential towers on the North Lot and the Gridiron Condos next to Lumen Field. With the thousands of new jobs anticipated to be coming to the Duwamish MIC and the
 3-7

anticipated housing to jobs imbalance being further exacerbated, the severe limits on housing are not reasonable. The final EIS should clearly articulate the rationale for these proposed restrictions and evaluate a reasonable alternative that includes more housing.

7. The concept of limiting the occupancy of new housing units to “persons engaged in and familiar with industrial operations and/or making/arts” is untenable and unfinanceable for the STAOD. For example, here are two circumstances to consider:
 - a) A perceived challenge for property managers will be to equitably measure the degree to which a prospective resident is “familiar” or “engaged in” industrial operations without running afoul of fair housing laws. Would a worker at T-Mobile park qualify? What about someone who works in accounting or HR at Nucor Steel? Is the City going to publish a list of occupations that qualify? This creates uncertainty and risk around the lease-up for new residential space that developers will not be willing to absorb.
 - b) There is increased risk to lenders when evaluating a potential construction loan around this restriction with regards to how it will impact stabilized occupancy and the lease-up. Tenants are clearly restricted to a subset of the general population so there are fewer potential renters, and this also potentially implies a limit on incomes. A longshoreman earning \$120,000 per year would qualify but a server at a brewpub earning \$16/hour would not? Lenders may be less willing to accept the risk with these restrictions in place, therefore limiting the availability of financing.

3-8

The final EIS should include an alternative that eliminates the concept of limiting occupancy of housing and instead concentrates new housing in areas like the STAOD where there is demonstrable demand and compatibility.

8. Caretaker and artist live-work spaces were incorporated into Seattle’s industrial zoning code many decades ago. Extending these antiquated concepts in a mixed-use area like the STAOD will significantly impact the feasibility of development projects with light industrial/maker’s space. We commissioned Heartland to analyze the economic feasibility of the City’s proposed development prototypes. A copy of the Heartland study is attached. The report states:

3-9

“Given the unique character of the STAOD and the current market forces, we hypothesize that for any substantial redevelopment to be feasible, the favorable economics of residential development would need to be fully harnessed to support the creation of new, Urban Industrial flex space”.

The City should eliminate the concept of tenant restrictions for housing and should analyze the impacts of a reasonable alternative that does so in the final EIS.

9. The density limits on new housing in the UI concept (25-50 DU/Acre) that would apply to the STAOD are—according to Heartland—so severe as to render housing meaningless to the project level economics. Adding residential to any building introduces a lot of complexities ranging from fire-life-safety, entries, parking, loading and trash rooms, elevators, structural elements, insurance, etc. It is exceedingly rare for a developer to choose to take on all of this added complexity for just one or two levels of housing. Even if a developer really wanted the housing, most lenders would struggle to underwrite the residential components and will either ‘pass’ on the loan or substantially decrease the size of the loan, which increases the equity required and reduces the returns. The City should increase the housing density limits in the STAOD to 200-220 DU/Acre and/or an FAR of 4.25-4.75, and the results of that change should be evaluated in the final EIS.

3-10

10. Workforce housing could support industry in the area and provide a public benefit by creating affordable housing opportunities for employees. Heartland’s analysis suggests that applying the Multifamily Property Tax Exemption Program (MFTE) to the project prototype will increase the feasibility of the project while offering 20% - 25% of units as affordable options to those making between 60% and 85% AMI, following city guidelines. MFTE is not a new program and has been proven in other areas of the city to be an effective approach in addressing housing affordability while also providing incentive to private developers to deliver additional supply. The final EIS should evaluate the impacts of an alternative that applies the MFTE program to the STAOD.

3-11

11. The Urban Industrial concept is a good one, but it must work economically, or it won’t get built. Heartland’s feasibility analysis finds that housing and maker spaces can coexist and are financially viable if allowed in the right proportions.

3-12

The DEIS evaluates a range of development concepts and building prototypes, but none of these prototypes include enough housing to be viable in a mixed-use program that includes the light industrial/maker spaces that the policies profess to encourage.

For this reason, the final EIS should study an alternative prototype that has been studied by Heartland that will better support the intended purpose of the Urban Industrial concept in the STAOD. This prototype would allow for up to five (5) floors of residential in a mid-rise development, with residential units prohibited in the first 25 feet of building height. This first 25 feet of height would allow for the build-out of light industrial/maker spaces on this first floor and provide the ceiling clear heights often associated and required by the uses desired in these light industrial/maker spaces. This alternative prototype proposes that all restrictions on residential tenant type be removed, and that the City extend the option for new development to participate in the City's MFTE program. Residential lease agreements would include provisions recognizing the potential externalities associated with industrial activities in the district (e.g., noise, light, traffic, etc.). An alternative consistent with this prototype should be evaluated in the final EIS.

3-12
cont.

This alternative prototype will achieve the goals desired by the proposed Urban Industrial concept, whereas the prototypes put forth by the City and studied by OPCD will not. The city should study this proposed prototype as a reasonable alternative in the final EIS.

12. In reviewing the financial feasibility of development prototypes in the proposed Urban Industrial Zone, the City uses Residential Land Values (RLV) minus the Cost of Land to determine "Economic Surplus" or project feasibility. One feature of RLV analysis is that the land valuation derived through this approach is highly sensitive to specific inputs. Applying a RLV model city-wide, becomes especially challenging when one submarket like the STAOD has substantially different conditions. The following assumptions used in the RLV analysis are also problematic and should be corrected in the final analysis and carried forward into the final EIS:

3-13

- **Land Costs:** It is important to note that the land cost assumptions are one of the most important assumptions under the methodology laid out in the OPCD study because of this variable's impact in arriving at the measure of feasibility: "economic surplus" (economic

surplus = RLV – Cost of land). Given the size of the study area, as well as the pricing dynamics across the City, it is unrealistic to use one input for the entire study area. The input used in the initial analysis was well below what market evidence indicates land values are in the STAOD, thus overestimating feasibility. These inputs should be corrected for the final analysis and EIS.

- **Commercial and Residential Rental Assumptions:** Both commercial and residential revenue assumptions are highly sensitive in the model as well as the associated escalations to revenue and cost. When reviewing the input assumptions used to inform these revenue numbers it was particularly noteworthy that little to no discount was applied to residential units, implying a market rate despite the tenant restrictions in the proposed Urban Industrial prototypes. This should be corrected for the final analysis and EIS.
- **Capitalization Rates:** The OPCD study does not clearly identify “cap rate” assumptions used for the various product types. This is important because (a) the assumed cap rate should capture the market’s perception of risk associated with a completed project, and (b) a 25 bps difference in the cap rate can shift a project from feasible to infeasible. These assumptions should be clarified in the final analysis and EIS.
- **Financing Considerations:** Another key assumption that was not addressed in the OPCD study is consideration around financing the project. Given the complexities associated with many of the development prototypes, the pool of potential lenders would be substantially limited and those that would consider lending on the project would underwrite the risk with more conservative terms such as higher debt service coverage ratio (DCSR), lower loan to cost (LTC) lower loan to value (LTV), and higher interests rates. Together, these more conservative loan terms will increase the cost of the project, the amount of equity needed and reduce the returns and thus the feasibility. These assumptions should be addressed in the final analysis and EIS.
- **Parking:** Parking is a challenge for every urban project because it is expensive to build but necessary to secure tenants. Parking is particularly challenging in the STAOD given (a) the cost associated

3-13
cont.

with poor soils and a high water table and (b) the impact that stadium events have on both on- and off-street parking. When the city-wide prototypes in the OPCD study area are applied to the STAOD, the commercial and residential parking quantities are inadequate to meet market demand and therefore are overstating the feasibility. This should be corrected in the final analysis and EIS.

- **Construction Costs and Timing Considerations:** Project feasibility is extremely dependent upon construction costs and timing around predevelopment, permitting, and construction. The further out these costs are incurred, the less reliable the output is. Additionally, these costs are moving very fast under current market conditions, which necessitates additional consideration.

The City's final analysis and EIS should study the financial feasibility of development prototypes for the Urban Industrial Zone in the STAOD informed by using the following baseline range of assumptions:

Assumption	Considerations and Input Recommendations for the STAOD Urban Industrial Prototypes
Land cost	Use a range of \$195-\$210 for land values in the STAOD
Rent Assumptions	<ul style="list-style-type: none"> ○ For Residential rents, Heartland recommends studying a starting range of \$3.25- \$3.65 per sf ○ For commercial rents, Heartland recommends studying a starting range of \$1.08-\$1.25 (NNN) per year ○ For Revenue and expense growth, Heartland recommends studying 3-5% per year.
Cap Rate Assumptions	<ul style="list-style-type: none"> ○ Heartland recommends the range of cap rate assumptions for the project fall between 4.0% and 4.5%
Financing Considerations	<p>The study should incorporate financing assumptions around the different types of loans that are typically needed, including construction loans and permanent financing. There are many factors to consider when financing, but the following assumptions for interest rates and loan amounts provide a good starting point:</p> <ul style="list-style-type: none"> ● Interest rate assumptions between 4%-5%

3-13
cont.

	<ul style="list-style-type: none"> ● LTC of 50-60% (construction) ● LTV (permanent loan take-out) between 50% -65%.
Parking	<p>Use a minimum parking assumption (driven by market factors and not proposed parking requirements)</p> <ul style="list-style-type: none"> ● 0.5 stall per residential unit ● 1:1000 ratio stalls to square feet of light industrial/maker space
Construction Costs	<p>Use a:</p> <ul style="list-style-type: none"> ● Minimum of \$375-\$400/sq.ft. for construction costs not including parking, ● Parking at a minimum range of \$90,000-\$100,000 per stall ● Estimate a range 20-24 Months as the baseline timeframe to entitle ● Estimate an additional 18-24 months for construction

3-13
cont.

13. Two thousand housing units for all of the new Urban Industrial Zone isn't enough to keep pace with the projected 59,000 new jobs in Seattle's MIC's under Alternative 4, as compared to the projected 23,000 new jobs in Seattle's MIC's under the No Action Alternative. The DEIS states that the result will be continued price pressure and other negative impacts. There needs to be a higher housing to employment ratio. Because there is no rationale given for any particular citywide cap on residential units on industrial lands and there is a significant need for more housing, we request that the City study an alternative in the final EIS that eliminates the citywide limit on residential units in industrial lands.

3-14

14. The City's final analysis and EIS should evaluate an alternative where height is not capped at 75 feet in the proposed Urban Industrial Zone, but rather is capped at 85', which is consistent with a significant amount of land in the STAOD (currently zoned IC85).

3-15

15. Under Housing Mitigation measures there is a statement that the City could require that housing be 500 ft away from railroads. This restriction should be removed as inappropriate in the STAOD, where rail is already very close to housing in Lumen Field's North Lot with little or no impact.

3-16

16. If the STAOD is not removed from the Duwamish MIC in the final analysis and EIS, then specific Comprehensive Plan goal statements should be developed that recognize its unique characteristics. The City should prepare such draft Comprehensive Plan goal statements for the STAOD. 3-17
17. The Urban Industrial Zone definition talks about existing industrial/manufacturing/maritime uses, which are almost nonexistent in the STAOD. The City's final analysis and EIS should delineate what industrial/manufacturing/maritime uses the City is referring to in the STAOD. 3-18
18. The City proposes to implement Urban Industrial zoning in the STAOD. However, the City also proposes to apply the Industry and Innovation Zone to a four acre parcel (WOSCA) within the STAOD. Prior to the master planning process for WOSCA, it is inappropriate to suggest zoning that would preclude consideration of residential uses there, especially given the Pioneer Square Neighborhood Plan, which calls for more housing on the periphery of the neighborhood. The City's final analysis and EIS should explain its rationale for applying the Industry and Innovation Zone to WOSCA. 3-19
19. The desire to maximize density around the significant public investment in Seattle's new light rail system calls for development prototypes that are plausible in the new Urban Industrial Zone. This necessitates sufficient residential uses to make light industrial/maker's spaces feasible. The City's final analysis and EIS should demonstrate how its proposals and alternatives will impact development around the Stadium Station. 3-20
20. For alternatives 3 and 4, the proposed requirement for new housing occupants to have a connection to industrial activity in the area is asserted as a mitigation for noise and other potential impacts. The City should clarify the basis for this assertion. 3-21
21. New zoning under Alternatives 3 and 4 include amenities to help mitigate the industrial environment for residential. The City's final analysis and EIS should explain how those amenities such as new open and green space would be funded/delivered? 3-22

22. The DEIS references new subarea plans, in line with the planning being done by PSRC. The City's final analysis and EIS should clarify when this planning process would happen and what it would entail.

HEARTLAND

March 2, 2022



Joshua Curtis, *Executive Director,*
Washington State Ballpark Public Facilities District
John Marchione, *Executive Director,*
Washington State Public Stadium Authority

Sent via email:

Joshua Curtis curtisj@ballpark.org,
John Marchione JohnM@stadium.org

RE: Evaluation of Redevelopment Concepts in the Stadium Transition Area Overlay District

Joshua and John:

Engagement Overview

Heartland has been engaged jointly by the Washington State Ballpark Public Facilities District (T-Mobile Park) and the Washington State Public Stadium Authority (Lumen Field) to evaluate the economics of various mixed use redevelopment concepts in the Stadium Transition Area Overlay District (STAOD) as part of your evaluation of the City's Maritime and Industrial Lands Strategy, Draft Environmental Impact Statement (DEIS). We commend the City on its efforts toward updating the industrial land use regulations and offer these initial comments in the hopes that collectively we will be able to formulate and adopt new zoning that reflects the important resources that make Seattle a vibrant place to live and work.

Key Points

- The Stadium Area is unique. Together, the stadiums, retail, office, hospitality, residential and general commercial make up most of the existing square footage. The area's legacy is industrial but its present and future is not, so the zoning should include mechanisms to facilitate transformation to a new kind of district.
- The DEIS is generally defining "industry supportive housing" as caretakers quarters or artist housing limited to "persons engaged in and familiar with industrial operations and/or making/arts". While there are some good examples of developers and architects creatively integrating a caretaker's unit (a single unit) into new projects (i.e. The Klotski Building, Ballard) this is more the result of making the most of antiquated zoning than policies that "support" industry. There is no need to couch the new industrial zoning designations for Seattle in the terms and approaches of a bygone era. The City is facing a chronic housing shortage AND there are fewer and fewer new spaces for light industry. The stadium area is one of the few anywhere in the city that could make a meaningful contribution to both.

- The idea of Urban Industrial is a good one, but it must work economically, or it won't get built. Our feasibility analysis finds that housing and maker spaces can coexist and are financially viable if allowed in the right proportions. The DEIS evaluates a range of development concepts, but none include enough housing to be viable in a mixed-use program that includes the light industrial/maker spaces that the policies profess to encourage.

OPCD Feasibility Analysis Review

The OPCD's feasibility analysis explores the feasibility of multiple development prototypes focusing on three industrial development concepts: (1) Traditional Industrial Development, (2) Industry and Innovation, and (3) Urban Industrial.

Based on a review of the initial draft technical memo, only development prototypes in the *Urban Industrial* concept were identified as feasible according to the parameters and assumptions set forth in OPCD analysis (see Exhibit 1 below). The result of this analysis warrants additional focus on the *Urban Industrial* concept being that it is the only concept identified as feasible in this study. This is the only concept which combines a housing component. Heartland's review of the inputs, assumptions, and outputs will be expanded upon later in this text as we outline an additional prototype we feel the OPCD should be considering in their evaluation.

Exhibit 1: OPCD Feasibility Summary Output

Prototype	Concept	Site Size	Model Output	Economic Surplus
Prototype 1:	Industry and Innovation	Medium Site	Not feasible	-5.8M
Prototype 2:	Industry and Innovation	Large Site	Not Feasible	-35.9 M
Prototype 3a:	Urban Industry	Small Site - one floor	Feasible	2.2M
Prototype 3b:	Urban Industry	Small Site - Two floor	Feasible	1.7M
Prototype 4a:	Urban Industry	Med Site - one floor	Feasible	4.7 M
Prototype 4b:	Urban Industry	Med site - two floor	Feasible	5.6 M
Prototype 5:	Urban Industry	Large Site - Separate	Not Feasible	-15.7 M
Prototype 6:	Urban Industry (STAOD)	Large Site - Stadium Overlay	Feasible	20.5 M
Prototype 7a:	Maritime Manufacturing - light		Not feasible	-20.9 M
Prototype 7b	Maritime Manufacturing - Manufacturing		Not feasible	-64 M

OPCD Study Review:

The OPCD study evaluates feasibility by comparing the RLV under the seven prototype development scenarios summarized in Exhibit 1 above to an estimated cost to acquire that land. Under each RLV scenario, feasibility was determined based on whether this value exceeds the assumed cost to acquire land, as measured in the study by “economic surplus” which represents the RLV less the cost to acquire the land.

One feature of RLV analysis is that the land valuation derived through this approach is highly sensitive to specific inputs. Applying a RLV model city-wide, becomes challenging when one submarket like the STAOD has substantially different conditions. We found several areas where the inputs to the OPCD study should be refined when applied to the STAOD.

- **Land Costs:** It is important to note that the land cost assumptions are one of the most important under the methodology laid out in the OPCD study, given this variable’s impact in arriving at the measure of feasibility: “economic surplus” (economic surplus = RLV – Cost of land). Given the size of the study area, as well as the pricing dynamics across the City, it seems odd to use one input for the entire study area. The input used in the initial analysis was well below what market evidence indicates land values are in the STAOD, thus overestimating feasibility.
- **Commercial and Residential Rental Assumptions:** Both commercial and residential revenue assumptions are highly sensitive in the model as well as the associated escalations to revenue and cost. It would appear that that the assumptions informing the multifamily revenue projections reflect little to no discount, implying a market rate despite the tenant restrictions in the proposed Urban Industrial prototypes.
- **Capitalization Rates:** The OPCD study does not clearly identify “cap rate” assumptions used for the various product types. This is important because (a) the assumed cap rate should capture the market’s perception of risk associated with a completed project, and (b) a 25 bps difference in the cap rate can shift a project from feasible to infeasible.
- **Financing Considerations:** Another key assumption that was not addressed in the OPCD study is consideration around financing the project. Given the complexities associated with many of the development prototypes, the pool of potential lenders would be substantially limited and those that would consider lending on the project would underwrite the risk with more conservative terms such as higher debt service coverage ratio (DCSR), lower loan to cost (LTC), lower loan to value (LTV), and higher interests rates. Together, these more conservative loan terms will increase the cost of the project, the amount of equity needed, and reduce the returns and thus the feasibility.
- **Parking:** Parking is a challenge for every urban project because it is expensive to build but necessary to secure tenants. Parking is particularly challenging in the STAOD given (a) the cost associated with poor soils and high-water table and (b) the impact stadium events have on both on- and off- street parking. When the city-wide prototypes in the OPCD study area are applied to the STAOD, the commercial and residential parking quantities are inadequate to meet market demand and therefore are overstating the feasibility.
- **Construction Costs and Timing Considerations:** Project feasibility is extremely dependent upon construction costs and timing around predevelopment, permitting, and construction. Additionally, these costs are changing rapidly under current market conditions, which necessitates additional consideration.

At a city-wide level, using residual land value model to determine feasibility is a reasonable approach. However, given the restriction on tenant type and residential density and the implications on the market-based assumptions, especially when applied to the STAOD, even the few “feasible” concepts are not actually viable.

Additional Considerations for the STAOD

The concept of limiting the occupancy of new housing units to “persons engaged in and familiar with industrial operations and/or making/arts” is untenable and unfinanceable in the STAOD. Here are a couple of circumstances to consider:

- A perceived challenge for property managers will be to equitably measure the degree to which a prospective resident is “familiar” or “engaged in” industrial operations without running afoul of fair housing laws. Would a worker at T-Mobile park qualify? What about someone who works in accounting or HR at Nucor Steel? Is the City going to publish a list of occupations that qualify? This creates uncertainty and risk around the lease-up for new residential space that developers will not be willing to absorb.
- There is increased risk to lenders when evaluating a potential construction loan around this restriction with regards to how it will impact stabilized occupancy and the lease-up. Tenants are clearly restricted to a subset of the general population so there are fewer potential renters, and this also potentially implies a limit on incomes. A longshoreman earning \$120,000 per year would qualify but a server at a brew pub earning \$16/hour would not? Lenders may be less willing to accept the risk with these restrictions in place, therefore limiting the availability of financing.

The density limits on new housing in the UI concept (25-50 DU/Acre) that would apply to the STAOD are so severe as to be meaningless to the project level economics. Adding residential to any building introduces a lot of complexities ranging from fire-life-safety, entries, parking, loading and trash rooms, elevators, structural elements, insurance, etc. It is exceedingly rare for a developer to choose to take on all of this added complexity for just one or two levels of housing. Even if a developer really wanted to include the housing, most lenders will struggle to underwrite the residential components and will either pass on the loan or substantially decrease the size of the loan which increases the equity required and reduces the returns.

Recommended Assumptions

Assumption	Considerations and Input Recommendations for the STAOD Urban Industrial Prototypes
Land cost	Use a range of \$195-\$210 for land values in the STAOD

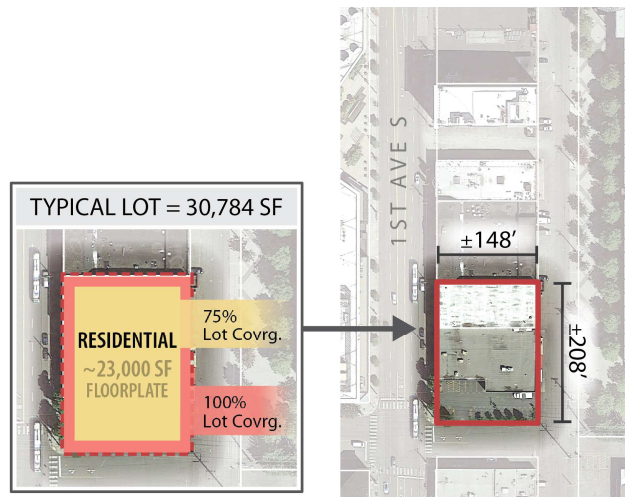
Rent Assumptions	<ul style="list-style-type: none"> ○ For Residential rents, we recommend studying a starting range of \$3.25- \$3.65 per sf ○ For commercial rents, we recommend studying a starting range of \$1.08-\$1.25 (NNN) per year ○ For revenue and expense growth, we recommend studying 3-5% per year.
Cap Rate Assumptions	<ul style="list-style-type: none"> ○ We recommend the range of cap rate assumptions for the project fall between 4.0% and 4.5%
Financing Considerations	<p>We believe that the study should incorporate financing assumptions around the different types of loans that are typically needed, including construction loans and permanent financing. There are many factors to consider when financing, but we believe some basic starting assumptions for interest rates and loan amounts provide a good starting point. Therefore, we recommend using:</p> <ul style="list-style-type: none"> • Interest rate assumptions between 4%-5% • LTC of 50-60% (construction) • LTV (permanent loan take-out) between 50% -65%.
Parking	<p>We recommend using a minimum parking assumption (driven by market factors and not proposed parking requirements)</p> <ul style="list-style-type: none"> • 0.5 stall per residential unit • 1:1000 ratio stalls to square feet of light industrial/maker space
Construction Costs	<p>We recommend using a:</p> <ul style="list-style-type: none"> • Minimum of \$375-\$400 for construction costs not including parking, • Parking at a minimum range of \$90,000-\$100,000 per stall • Estimate a range 20-24 Months as the baseline timeframe to entitle • Estimate an additional 18-24 months for construction

Alternative Development Prototype for STAOD

The OPCD study highlights that the inclusion of residential units improves the feasibility of the Urban Industrial development prototypes. Given the unique character of the STAOD and the current market forces, we hypothesize that for any substantial redevelopment to be feasible, the favorable economics of residential development would need to be fully harnessed to support the creation of new, Urban Industrial flex space.

The new development prototype includes 5 levels of housing over a 25’ clear height ground floor space dedicated to flex/ light industrial uses. The residential component of this prototype provides the economic engine to develop new modernized flex industrial space, in support of the OPCD’s Industrial land use policy, while also providing the city with additional housing supply.

Exhibit 2: Typical Development Site and Proposed Prototype



Analysis Summary

This analysis models the development of the proposed *Urban Industrial* prototype alternative on a development site representative of a typical site that can be found in the STAOD, see *Exhibit 2*. A development pro forma was created using inputs and assumptions specific to the STAOD, modeling the cashflows from predevelopment through stabilization and a sale after a five-year hold period. The model projects the amount of equity required to undertake the development of this prototype and projects the internal rate of return (IRR) from these cashflows. These inputs and assumptions were then toggled for sensitivity to identify those that have the highest risk of pushing the project IRR out of an acceptable range to most developers and equity investors, therefore making the project infeasible.

The target IRR varies based on several factors including the perceived risk of a project on the developer's cost of capital. The minimum IRR required by most developers to make a product of this nature feasible would be in the mid to high teens. For this analysis we use a 15% IRR as the minimum required for "feasibility". All the assumptions and other model inputs are included in appendix, key inputs and associated impacts on feasibility are discussed below.

Revenue

- The project is very sensitive to residential market rents as well as the rent growth assumptions, see *Exhibit 3*. We are largely drawing upon existing projects in the area such as the Wave for estimating rents in the STAOD.
- We are using a similar value to the OPCD study for commercial LI/Flex rents based on our outreach at \$13-14/sf per year (this is NNN). The return output is not highly sensitive to this input in our model. This input reflects current rents based on the existing supply of flex buildings in the area.

Exhibit 3: Revenue Sensitivity

RENT	IRR
\$3.20	9.6%
\$3.30	11.1%
\$3.40	12.7%
\$3.50	14.2%
\$3.60	15.8%
\$3.70	17.4%
\$3.80	18.9%
\$3.90	20.5%
\$4.00	22.1%

Costs

- \$305/SF for the hard costs for the multi-family portion of the building.
- \$275/SF hard cost for the flex/maker space.
- Soft costs equal to 20% of hard costs.
- \$90k per Stall for the below grade parking, at a 1/1,000 SF Ratio for the flex space, and at a 0.5 ratio per unit for the multi-family.
- 5% cost contingency.
- \$200/SF Land Costs
- The project is most certainly sensitive to timing/delays as well.

Exhibit 4: Cost Sensitivity

Construction Costs	IRR	Land Acquisition Costs	IRR
\$265	22.5%	\$160	16.8%
\$275	20.6%	\$170	16.6%
\$285	18.9%	\$180	16.3%
\$295	17.3%	\$190	16.0%
\$305	15.8%	\$200	15.8%
\$315	14.3%	\$210	15.5%
\$325	13.0%	\$220	15.3%
\$335	11.6%	\$230	15.0%
\$345	10.4%	\$240	14.8%

Financing

- This analysis incorporates financing assumptions, which aren't considered in the OPCD's Study. The project returns are not as sensitive to moderate swings on the financing inputs such as loan amount and rate (for the construction and permanent loans).
- The Exit Cap rate assumption drives a good deal of sensitivity for the output.

Exhibit 5: Financing Sensitivities

<u>Exit Cap Rate</u>	<u>IRR</u>
3.85%	19.2%
3.95%	18.3%
4.05%	17.5%
4.15%	16.6%
4.25%	15.8%
4.35%	15.0%
4.45%	14.2%
4.55%	13.4%
4.65%	12.6%

LTC/LTV		Loan To Value								
		35.00%	40.00%	45.00%	50.00%	55.00%	60.00%	65.00%	70.00%	75.00%
LOAN TO COST	35.00%	12.9%	13.3%	13.6%	14.0%	14.5%	15.0%	15.5%	16.1%	16.8%
	40.00%	13.0%	13.3%	13.7%	14.1%	14.5%	15.0%	15.6%	16.2%	16.9%
	45.00%	13.0%	13.3%	13.7%	14.1%	14.6%	15.1%	15.6%	16.3%	17.0%
	50.00%	13.0%	13.3%	13.7%	14.1%	14.6%	15.1%	15.7%	16.4%	17.1%
	55.00%	13.0%	13.4%	13.8%	14.2%	14.7%	15.2%	15.8%	16.4%	17.2%
	60.00%	13.0%	13.4%	13.8%	14.2%	14.7%	15.3%	15.9%	16.5%	17.3%
	65.00%	13.1%	13.4%	13.8%	14.3%	14.8%	15.3%	15.9%	16.6%	17.4%
	70.00%	13.1%	13.5%	13.9%	14.3%	14.8%	15.4%	16.0%	16.7%	17.6%
	75.00%	13.1%	13.5%	13.9%	14.4%	14.9%	15.5%	16.1%	16.9%	17.7%

We feel the development prototype tested in this analysis provides a feasible alternative for the STAOD. Under this scenario, new flex/industrial/maker space is provided at current rents. The expanded residential component in this prototype is the engine driving this feasibility, while also providing much needed additional housing supply.

A New Pilot

The stakeholders in the stadium district welcome the opportunity to work with the City to formulate an alternative approach to this unique part of the city that includes a pilot program designed to produce a meaningful quantity of, economically viable, workforce (MFTE) housing AND modern maker space to accommodate the innovative industries and creative businesses of the future. Under this alternative:

- The zoning in the stadium district would allow mid-rise housing over maker space. This prototype would allow for up to five (5) floors of residential in a mid-rise development, with residential units prohibited in the first 25 feet of building height. This first 25 feet of height would allow for the build-out of light industrial/maker spaces on this first floor and provide the ceiling clear heights often associated and required by the uses desired in these light industrial/maker spaces.
- MFTE would be extended throughout the district.
- Residential lease agreements will include provisions recognizing the potential externalities associated with industrial activities in the district.
- The city will commission a review of the effectiveness of the pilot program at the earlier of 1,000 residential units being completed or 7 years from the start of the program.

The inclusion of the MFTE in the baseline model increases the project returns by 1%, further supporting project feasibility while offering 20% - 25% of units as affordable options to those making between 60% and 85% AMI, following city guidelines. This creates a benefit of workforce housing that could further support industry in the area.

We welcome the opportunity to work with the PSA/PFD and OPCD on additional refinements to the zoning concepts and potential pilot program being evaluated by the EIS.

Sincerely



Matt Anderson,

Principal & Senior Project Director
Heartland LLC

Appendix

- Deal Summary Sheet Baseline
- Deal Summary Sheet with MFTE
- Building Program Summary Sheet Baseline
- Building Program Summary with MFTE

DEAL SUMMARY

DRAFT

Project Overview	
# Units	150
Lot Area	30,784
Average Unit Size	670
NRSF	126,599
Gross Square Footage	146,224
Parking Spaces - Total	101
Parking Spaces - Comm	26

Project-Level Returns	
Yield on Cost	4.60%
Est. Market Cap Rate	4.25%
Spread (bps)	0.35%

Valuation	
Sale Date	Jan-29
NOI at Exit	\$4,352,167
Exit Cap	4.25%
Est. Stabilized Value	\$102,403,936
Est. Value Per Unit	\$682,693
Est. Value PSF	\$700

Operating Metrics	
OpEx / EGI	24%
Opex Per Unit	\$7,285

Annual Cash Flows	
2022	(\$523,913)
2023	(\$1,571,739)
2024	(\$37,328,936)
2025	\$11,359,590
2026	\$940,055
2027	\$1,328,211
2028	\$1,498,018
2029	\$57,533,441

IRR	15.8%
Profit	\$33,234,728
MOIC	1.89

Sources & Uses						
Sources	% of Total Equity	Amount	Uses	Amount	\$ PSF	\$ Per Unit
Land Equity			Land	\$6,156,800	\$42	\$41,045
Pre-Development Equity	7%	\$2,619,564	Hard Cost Flex	\$8,450,208	\$58	\$56,335
Required Equity	93%	\$37,328,936	Hard Cost MF	\$35,209,200	\$241	\$234,728
Construction Loan		\$33,814,709	Contingencies	\$3,074,064	\$21	\$20,494
Total Sources		\$73,763,210	Parking Costs	\$9,090,000	\$62	\$60,600
			Soft Costs	\$8,731,882	\$60	\$58,213
			Financing Costs	\$3,051,055	\$21	\$20,340
			Total Uses	\$73,763,210	\$504	\$491,755

Pro Forma Income & Expenses			
Income	Rate	Quantity	Annual
Residential Rent			\$4,082,400
Comm Rent	\$14	26,166	\$366,330
Parking Income		\$125	\$112,500
Utilities Reimbursements			\$105,188
Other Income		\$25	\$45,000
Vacancy Allowance		5.0%	(\$222,436)
Effective Gross Income			\$4,488,981

Operating Expenses			
	Rate	Per Unit	Annual
Property Tax		\$3,434	\$515,118
Property Management	4%	\$1,197	\$179,559
On-Site Manager		\$433	\$65,000
Insurance		\$300	\$45,000
Gas, Electricity	85%	\$550	\$82,500
Water, Sewer, Garbage	85%	\$275	\$41,250
Elevator		\$95	\$14,250
Internet		\$100	\$15,000
Repairs & Maintenance		\$300	\$45,000
Turnover		\$250	\$37,500
General & Administrative		\$200	\$30,000
Marketing		\$150	\$22,500
Total Res Operating Expenses		\$7,285	\$1,092,677
Net Operating Income			\$3,396,303

Project Timing			
Timeline	Start	Period	End
Pre-Dev	May-22	20	Jan-24
Construction	Jan-24	18	Jul-25
Lease-Up	Jul-25	9	Apr-26
Stabilization	Apr-26	3	Jul-26
Permanent Loan	Oct-25	120	Oct-35
Sale	Jan-29	60	N/A

Financing			
	Rate	LTV	Amount
Permanent Loan			
Interest Rate		4.50%	
LTV		65.0%	
NOI at Refinance			\$3,367,893
Valuation Cap		4.75%	
Value			\$70,903,016
Loan Amount			\$46,086,961
Annual Debt Service			(\$2,802,190)
DSCR			1.20
Construction Loan			
Interest Rate		4.50%	
LTC		55%	
Loan Amount			\$33,814,709

Unit Mix				
Unit Type	Count	Approx. SF	\$ PSF	Rent
Studio	50	450	\$3.60	\$1,620
Open 1	45	575	\$3.60	\$2,070
1 Bed	30	725	\$3.60	\$2,610
2 Bed	25	975	\$3.60	\$3,510
3 Bed	0		\$3.60	\$0
Total	150	100,433	\$3.60	\$340,200
Weighted Average		670	\$3.60	\$2,268

Other Assumptions	
Hard Costs \$ PSF	\$305
Soft Costs (as % of Hard Costs)	20%
Pre Dev. Costs (as % of Soft Costs)	30%
Revenue Growth	4%
Expense Growth	4%
Construction Loan	Yes
Permanent Loan	Yes
Ongoing CapEx (Per Unit Per Year)	\$250
Land Valuation (\$ per LSF)	\$200
Parking Cost Per Stall	\$90,000
Developer Margin on Cost, Parking	20%
Cost Contingency	5%

Disposition	
Transactions Costs	3.0%

Financing Costs	
Origination Fee (as % of Loan Amount)	1%
Legal & Admin Fees	\$50,000

Forward NOI Dates	
Oct-25	
Oct-26	

DEAL SUMMARY

DRAFT

Project Overview	
# Units	150
Lot Area	30,784
Average Unit Size	670
NRSF	126,599
Gross Square Footage	146,224
Parking Spaces - Total	101
Parking Spaces - Comm	26

Project-Level Returns	
Yield on Cost	4.69%
Est. Market Cap Rate	4.25%
Spread (bps)	0.44%

Valuation	
Sale Date	Jan-29
NOI at Exit	\$4,432,486
Exit Cap	4.25%
Est. Stabilized Value	\$104,293,783
Est. Value Per Unit	\$695,292
Est. Value PSF	\$713

Operating Metrics	
OpEx / EGI	17%
Opex Per Unit	\$4,813

Annual Cash Flows	
2022	(\$523,913)
2023	(\$1,571,739)
2024	(\$37,328,936)
2025	\$12,921,298
2026	\$935,412
2027	\$1,316,662
2028	\$1,489,602
2029	\$57,988,960

IRR	16.9%
Profit	\$35,227,347
MOIC	1.94

Sources & Uses						
Sources	% of Total Equity	Amount	Uses	Amount	\$ PSF	\$ Per Unit
Land Equity			Land	\$6,156,800	\$42	\$41,045
Pre-Development Equity	7%	\$2,619,564	Hard Cost Flex	\$8,450,208	\$58	\$56,335
Required Equity	93%	\$37,328,936	Hard Cost MF	\$35,209,200	\$241	\$234,728
Construction Loan		\$33,814,709	Contingencies	\$3,074,064	\$21	\$20,494
Total Sources		\$73,763,210	Parking Costs	\$9,090,000	\$62	\$60,600
			Soft Costs	\$8,731,882	\$60	\$58,213
			Financing Costs	\$3,051,055	\$21	\$20,340
			Total Uses	\$73,763,210	\$504	\$491,755

Pro Forma Income & Expenses			
Income	Rate	Quantity	Annual
Residential Rent			\$3,784,200
Comm Rent	\$14	26,166	\$366,330
Parking Income		\$125	\$112,500
Utilities Reimbursements			\$80,438
Other Income	\$25		\$45,000
Vacancy Allowance	5.0%		(\$207,526)
Effective Gross Income			\$4,180,941

Operating Expenses			
	Rate	Per Unit	Annual
Property Tax		\$1,045	\$156,721
Property Management	4%	\$1,115	\$167,238
On-Site Manager		\$433	\$65,000
Insurance		\$300	\$45,000
Gas, Electricity	65%	\$550	\$82,500
Water, Sewer, Garbage	65%	\$275	\$41,250
Elevator		\$95	\$14,250
Internet		\$100	\$15,000
Repairs & Maintenance		\$300	\$45,000
Turnover		\$250	\$37,500
General & Administrative		\$200	\$30,000
Marketing		\$150	\$22,500
Total Res Operating Expenses		\$4,813	\$721,959
Net Operating Income			\$3,458,982

Project Timing			
Timeline	Start	Period	End
Pre-Dev	May-22	20	Jan-24
Construction	Jan-24	18	Jul-25
Lease-Up	Jul-25	9	Apr-26
Stabilization	Apr-26	3	Jul-26
Permanent Loan	Oct-25	120	Oct-35
Sale	Jan-29	60	N/A

Financing			
Permanent Loan			
Interest Rate			4.50%
LTV			65.0%
NOI at Refinance		\$3,474,220	
Valuation Cap			4.75%
Value		\$73,141,475	
Loan Amount		\$47,541,959	
Annual Debt Service		(\$2,890,657)	
DSCR			1.20
Construction Loan			
Interest Rate			4.50%
LTC			55%
Loan Amount		\$33,814,709	

Unit Mix				
Unit Type	Count	Approx. SF	\$ PSF	Rent
Studio	50	450	\$3.60	\$1,620
Open 1	45	575	\$3.60	\$2,070
1 Bed	30	725	\$3.60	\$2,610
2 Bed	25	975	\$3.60	\$3,510
3 Bed	0		\$3.60	\$0
MFTE				
Studio	10			\$1,214
Open 1	9			\$1,214
1 Bed	6			\$1,619
2 Bed	5			\$2,082
3 Bed	0			\$0
Subtotal	30			
Total	150	100,433		\$315,350
Weighted Average		670	\$3.60	\$2,268

Other Assumptions	
Hard Costs \$ PSF	\$305
Soft Costs (as % of Hard Costs)	20%
Pre Dev. Costs (as % of Soft Costs)	30%
Revenue Growth	4%
Expense Growth	4%
Construction Loan	Yes
Permanent Loan	Yes
Ongoing CapEx (Per Unit Per Year)	\$250
Land Valuation (\$ per LSF)	\$200
Parking Cost Per Stall	\$90,000
Developer Margin on Cost, Parking	20%
Cost Contingency	5%
Disposition	
Transactions Costs	3.0%
Financing Costs	
Origination Fee (as % of Loan Amount)	1%
Legal & Admin Fees	\$50,000

Building Schematic - Mid-rise

1315 STAOD Zoning Feasibility Analysis

Jan 2022

Building Assumptions

Lot Size	30,784	<i>This is from the ppt Presentation</i>	212.2531185
Construction Type			
Stories	6		
Residential	5		
Commercial	1		
Lot Coverage			
Residential	75%	<i>This is from the PPT Presentation</i>	
Res Efficiency	87%		
Light Industry/Flex	100%	<i>This is from the PPT Presentation</i>	
LI/Flex Efficiency	85%	<i>note: This assumed some level of residential interfacing with the street. Otherwise the flex space would be open and efficient</i>	
Parking			
Res Ratio	0.50	<i>Per unit</i>	
LI/Flex Ratio	1.00	<i>per 1000sf</i>	
SF/stall	400	<i>This is the assumption for stall + circulation</i>	

Building Summary

Residential Units	150
Commercial Units	30,784
Building Gross Area	146,224

Area		
Residential GFA	115,440	<i>GFA, Included in FAR</i>
Residential NRSF	100,433	
Residential Amenity	5,022	<i>illustrative, already included Res GFA</i>
Industrial	30,784	<i>GFA included in FAR</i>
Industrial NRSF	26,166	

Exempt Area		
Parking Area	40,400	<i>Excluded from FAR</i>
Parking Stalls	101	
Parking Res	75	
Parking Comm	26	

FAR Calculations	LU Code	LU Area	Provided	Difference	Provided FAR
Total Site Area	30,784				
Max Res FAR	4.25	130,832	115,440	15,392	3.75 COMPLIES
Max total FAR	4.75	146,224	146,224	0	4.75 COMPLIES

ROOF Amenity	0	0	0	0	3,000	0%	0
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Level	Unit Type	Gross Area	Total NRSF	% Of NRSF	NRSF/Floor	# of Units	Average Unit Size
Residential Floor		23,088	20,087	100%	20,087	30	
	Studio	-	-	23%	4,620	10	450
	Open 1	-	-	27%	5,423	9	575
	1 Bed	-	-	22%	4,419	6	725
	2 Bed	-	-	23%	4,620	5	975
	3 Bed	-	-	0%	0	0	0
	Amenity	-	-	5%	1,004		

Level	Unit Type	Gross Area	Total NRSF	% Of NRSF	# of Units
Ground	Makers Space				
	Flex Shell, 25'	30,784	26,166	100%	1
	Doc Doors	3			

Parking		
Res Stalls	75	
LI/Flex Stalls	26	
Total Stalls	101	
Parking Area	40,400	

Building Assumptions

Lot Size	30,784	<i>This is from the ppt Presentation</i>
Construction Type		
Stories	6	
Residential	5	
Commercial	1	
Lot Coverage		
Residential	75%	<i>This is from the PPT Presentation</i>
Res Efficiency	87%	
Light Industry/Flex	100%	<i>This is from the PPT Presentation</i>
LI/Flex Efficiency	85%	<i>note: This assumed some level of residential interfacing with the street. Otherwise the flex space would be open and efficient</i>
Parking		
Res Ratio	0.50	<i>Per unit</i>
LI/Flex Ratio	1.00	<i>per 1000sf</i>
SF/stall	400	<i>This is the assumption for stall + circulation</i>

Building Summary

Residential Units	150
Commercial Units	30,784
Building Gross Area	146,224

Area		
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Residential NRSF	100,433	
Residential Amenity	5,022	<i>illustrative, already included Res GFA</i>
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Industrial NRSF	26,166	

Exempt Area		
Parking Area	40,400	<i>Excluded from FAR</i>
Parking Stalls	101	
Parking Res	75	
Parking Comm	26	

FAR Calculations	LU Code	LU Area	Provided	Difference	Provided FAR
Total Site Area		30,784			
Max Res FAR	4.25	130,832	115,440	15,392	3.75 COMPLIES
Max total FAR	4.75	146,224	146,224	0	4.75 COMPLIES

ROOF	Amenity	0	0	0	0	3,000	0%	0
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Level	Unit Type	Gross Area	Total NRSF	% Of NRSF	NRSF/Floor	# of Units	Average Unit Size	
Residential Floor		23,088	20,087	100%	20,087	30		
	Studio	-	-	23%	4,620	10	450	
	Open 1	-	-	27%	5,423	9	575	
	1 Bed	-	-	22%	4,419	6	725	
	2 Bed	-	-	23%	4,620	5	975	
	3 Bed	-	-	0%	0	0	0	
NON-MFTE								Total units
	Studio					8		40
	Open 1					7		36
	1 Bed					5		24
	2 Bed					4		20
	3 Bed					0		0
MFTE								
	Studio					2		10
	Open 1					2		9
	1 Bed					1		6
	2 Bed					1		5
	3 Bed					0		0
	Amenity	-	-	5%	1,004	30	TRUE	150
					Check			

Level	Unit Type	Gross Area	Total NRSF	% Of NRSF	# of Units
Ground	Makers Space				
	Flex Shell, 25'	30,784	26,166	100%	1
	Doc Doors	3			

Parking		
Res Stalls	75	
LI/Flex Stalls	26	
Total Stalls	101	
Parking Area	40,400	

Holmes, Jim

From: ffitch, Eric <ffitch.E@portseattle.org>
Sent: Wednesday, March 02, 2022 5:22 PM
To: Wentlandt, Geoffrey; Holmes, Jim
Cc: Bolieu, Sabrina; Parks, Melissa; Lise, Kyra; Gellings, Joseph; Poor, Geraldine; Christine Wolf; Wilson, Deirdre; Wolpa, Lindsay
Subject: Port of Seattle/NWSA comments on Industrial and Maritime Strategy DEIS
Attachments: 2022 03 02 APPENDIX Port of Seattle and the Northwest Seaport Alliance staff technical comments on DEIS.pdf; 2022 03 02 LTR Port of Seattle and NWSA letter to Mayor Harrell on Industrial and Maritime Strategy DEIS FINAL .pdf

CAUTION: External Email

Geoff and Jim—We appreciate your teams immense amount of work on the DEIS, and the multiple opportunities you took to talk with our team as we reviewed. Attached you will find the Port/NWSA comment letter and our *robust* (and lengthy!) staff appendix.

I’m sure we will have occasion to talk with you quite a bit about this in the coming weeks and months. And I can speak for the whole team here when I say that we are looking forward to that and to continued partnership.

Thanks for everything,

Eric f. and the POS/NWSA team



Eric ffitch
Senior Government Relations Manager
Tel: (206) 787-3199 | Mobile: (206) 369-4968



March 2, 2022

The Honorable Bruce Harrell
Mayor, City of Seattle
600 4th Ave, 7th Floor
Seattle, WA 98104

Dear Mayor Harrell,

As contributing members of the Mayor's Industrial Maritime Strategy Process, we are pleased to submit the following comments to you on behalf of the Port of Seattle and as Managing Members of The Northwest Seaport Alliance (NWSA). We joined the workgroup in late 2019 because of the critical importance of the City's industrial land base to port operations and the workers that keep our city running. Then and now, we engage in the spirit of collaboration and partnership

We are approaching our comments on this Draft Environmental Impact Statement (DEIS) the same way we approached our engagement with Mayor Durkan's industrial and maritime strategy council: we want to strengthen and grow industrial lands and jobs, not just preserve and protect them. For that reason, **we support Alternative 2** in the DEIS, as we see it strengthening existing protections against incompatible development in the industrial areas while ensuring our "No Net Loss" of industrial lands guiding principle is upheld. Alternative 2 also includes many of the issues that we have long advocated for at the City, including:

- Closing loopholes that allow for the non-industrial development within the Manufacturing Industrial Centers (MICs)
- Prohibiting removal of land from MICs except as part of the eight-year comprehensive plan review cycle
- Identifying a clear vision for what development around Link Light Rail stations within the City's MICs will look like, and how it will support industry

As industrial landlords and developers, the Port and NWSA know there is strong demand for industrial land and warehousing space and that supply chain congestion consequences come from an insufficient supply of both. These essential facilities serve our trade-driven economy and, as we emphasized in our scoping comments, that once industrial zoned land is re-zoned to allow for expanded residential development, it will never be returned to its previous use. In addition, our role as an industrial developer requires that we be a good neighbor and a good steward of the environment, and hence we are conscious of the challenges that come with siting incompatible residential uses adjacent to industrial zones. Therefore, we request that the City advance Alternative 2 through the Council process to achieve the strongest protections for these existing industrial lands.

Staff reviewed the DEIS through the lens of the consensus objective that brought us together in Fall 2019 and that our goal was to "support the next generation of industrial and maritime jobs." We will

4-1

center our feedback on the DEIS around that consensus principle and want to avoid using this process as a forum for address the regional housing affordability crisis. The Port and NWSA agree that addressing affordable housing is a critical regional priority and one that is not totally distinct from the success of the industrial and maritime sectors. On that, we would observe that the abundance of City areas that require residential development should disqualify the two MICs, where housing is prohibited, from being discussed as an option for increasing the City’s housing supply. For purposes of this DEIS, our preferred alternative and the supporting policies, we want to focus on promoting success for the diverse economic sectors rooted within the MICs, and not on the broader regional problem of housing affordability.

4-1
cont.

Our comments here will be augmented by an appendix that features technical comments from subject-matter experts across the Port and NWSA. Those comments will follow the themes we present for your consideration here. They are generally, as follows:

- *Equity of economic opportunity:* Our industrial and manufacturing sectors are a significant source of jobs that do not require a college degree. This employment mix is accessible to a variety of education levels while paying living wages and providing high quality benefits. This process began with policymakers and stakeholders agreeing on the need to maintain diverse economic sectors in the City of Seattle to ensure there are opportunities available for all residents. Preserving industrial lands is critical to that effort.

4-2

We appreciate the DEIS’s acknowledgement of this important dynamic, encapsulated in Section 1.3.1 of the DEIS:

“There are currently around 98,500 industrial jobs (2018) or about 15% of total jobs in the city—about two-thirds of these jobs are available with only a high school diploma, and over half of the jobs in the maritime sector are available to persons with no formal educational training. Average earnings per worker are over 70% of the Area Median Income (AMI) in the construction, aerospace/aviation, and logistics sectors, and a high number of jobs in logistics, maritime, and manufacturing sectors remain unionized and provide high quality benefits.”

Promoting and expanding the types of jobs described in this section is the explicit reason the process was convened in the fall of 2019 and is a core Port of Seattle and NWSA priority.

- *Environmental justice considerations:* The Port of Seattle has devoted substantial time and investment to addressing environmental justice issues in near-port communities. Our work with the Duwamish River Community Coalition and other groups in the South Park and Georgetown areas gives us clear understanding of the challenges inherent in residential development adjacent to heavy industrial use. We are concerned that Alternatives 3 and 4 acknowledge the location of new residential communities near the industrially-zoned MICs, but simply suggest that the impacts there can be mitigated. We find it’s also worth noting, in this context, that other regional processes support this concern. The Puget Sound Regional Council’s VISION 2050,

4-3

for example, sets forth a goal of reducing health disparities and improving health outcomes across the region.

- *Cost of mitigation:* One general concern in the DEIS, as referenced in the environmental justice concerns above, is that Alternatives 3 and 4 identify impacts for issues, including public health and freight mobility, but suggest they can be mitigated. We understand this is standard in the EIS process, but we would like to see substantial attention given in the Final EIS to what the public and private cost of mitigation would be. For example, to mitigate freight impacts, would that require substantial transportation project investments from the City, State, or Port? The roadways that serve the Duwamish MIC represent more than \$5 billion in state transportation investment, and the Port alone put more than \$280 million toward the construction of the SR 99 tunnel. Changing zoning to allow incompatible uses threatens prior public investment and may require additional public investment. Similarly, those mitigation costs borne by developers—be they geologic, utilities, brownfields clean up, landscaping and pedestrian amenities, or other—will impact the bottom line of the developers’ pro forma and create risks for the viability of such development.

4-4

- *Regional importance of freight mobility:* Our position has been firm from the outset of this process that freight routes and regional transportation planning must be a central focus if the goal is promoting the success of the industrial and maritime sectors. Conflicts between passenger vehicles commuting from residential areas and freight trucks and other heavy machinery that operates within the MICs generate safety concerns, but also risks congestion, slowing the movement of freight. For example, due to greater growth of residential uses in Alternatives 3 and 4, there would be significant impacts to vehicle movement on 15th between the Ship Canal and Leary Way (a “Major Truck Street”), to Dravus Street between 15th and 20th, and on I-5 from Madison to SR-599 (Tukwila). This means not only trucks and cars, but also buses, get stuck in congestion. Congestion results in reduced mobility for residents, diminished efficiency and competitiveness for businesses statewide, as well as increased emissions as vehicles idle and wait. Additionally, those emissions impact the air quality in near-port communities. Our DEIS comments will highlight the importance of promoting freight mobility.

4-5

- *Incompatibility of residential and industrial zoning:* At multiple points in the DEIS, the City emphasizes the objective of “increasing access to workforce and affordable housing for employees in industrial maritime sectors without creating land use conflicts that displace industrial uses.” We agree with this objective but will restate an enduring concern: that the term “workforce housing” is not defined but it suggests housing either within or directly adjacent to industrial areas. This raises concerns with zoning incompatibility and environmental justice for communities living near industrial areas.

4-6

There is ample development capacity in areas of the city zoned for residential, including near Light Rail stops. We would like to see the Final EIS acknowledge that industrial workers’ needs

for affordable housing does not mean that housing should be within or adjacent to the MICs. The Port stands ready to work with our city partners on pursuit of increased density in areas that are better suited for residential development.

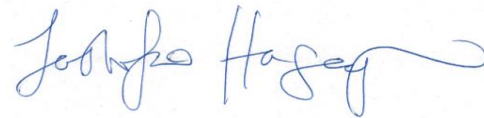
4-6 cont.

Please also see the attached document for our in-depth review of many of the chapters and technical feedback on issues from soils to air quality. We appreciate the chance to comment and look forward to further discussion and to helping advance a consensus alternative through Council.

Sincerely,



Fred Felleman
Port of Seattle Commissioner
Northwest Seaport Alliance Managing Member



Toshiko Hasegawa
Port of Seattle Commissioner
Northwest Seaport Alliance Managing Member

ATTACHMENT A – TECHNICAL COMMENTS:

Submitted on behalf of the Port of Seattle and the Northwest Seaport Alliance, in response to a request for comments on the City of Seattle’s “Seattle Industrial Maritime Strategy - Draft Environmental Impact Statement (DEIS).”

Section 1 – Summary

As we review the DEIS, we are conscious of the fact that public participation is key to any successful EIS process. We are particularly interested in strong public participation on this issue, since in our experience zoning issues are not the subject of public focus. Therefore, we are concerned that the EIS relies heavily on technical terminology such as Floor Area Ratio (FAR), development jargon such as “urban villages,” and other language which may make it difficult for the public to engage. We recommend the Final EIS be updated to address concerns about technical language and public consumption.

4-7

1.4.2 Public Comment Opportunities



We respectfully observe that the picture of container cargo activity on Page 1-10 is a picture of the East Blair Roll on Roll Off terminal on Commencement Bay at the Port of Tacoma. *Recommend replacing with an image of Seattle container operations.*

4-8

1.5.2 Proposal

On Page 1-12, the summary indicates that the “EIS addresses land use compatibility, and consistency with City and State Plans.” Because this is a document that intends to plan for the future of the industrial and maritime sectors and given the Port of Seattle and Northwest Seaport Alliance’s role as a local government partner and developer of industrial facilities—we *recommend the inclusion of additional information on Port/NWSA development plans for alignment with this document. See <https://www.portseattle.org/about/port-programs-projects>*

4-9

1.5.3 Land Use Concepts

- On Page 1-15, in the table that outlines “Challenges Addressed” by the adoption of the Urban Industrial land use concept, we note the inclusion of the following statement as a challenge: “strong demand for worker housing near jobs.”

As we have stated throughout the process, we understand that there is regional demand for affordable housing, however we have not seen any data presented by the City that specifically affirms that workers in *industrial jobs*, located within the Manufacturing Industrial Centers (MICs) that prohibit housing, have expressed that same demand. *Recommend the City include data that confirms the industrial workforce demand for housing in the MICs; absent that we recommend removing this as a “challenge addressed.”*

4-10



- On Page 1-17, the picture of cargo operations is the Husky Container Terminal on the Blair Waterway at the Port of Tacoma. *Please replace with an image depicting Seattle cargo container operations.*

4-10
cont.

1.5.4 Regulatory Concepts

On Page 1-18, the table titled “Development Standards by Land Use Concept” references what is allowed under each of the new Land Use Concepts. We observe that it would be more informative if the allowable uses under *current zoning* were included alongside the proposed changes to the zones. *Recommend including description of allowable development types under current land use code.*

4-11

1.5.5 Alternate 1 – No Action

- As indicated in our comment above, discussion of the changes to zones covered in each alternative should include some discussion of what is allowed under current zones to help the casual reader understand immediately the choices inherent in each different public policy option.
- We respectfully observe that the image on Page 1-21 depicts workers at the Pierce County Terminal at the Port of Tacoma. *Recommend replacing with an image depicting workers at Seattle facilities.*

4-12

1.7.2 Air Quality and GHG

The high-level summary of current conditions and projections presented in this section seem reasonable to Port/NWSA subject matter staff. And the high-level mitigation measures they suggest are consistent with our work, however it’s worth noting that we support acceleration of electrification efforts if it can be done collaboratively and in a way that recognizes technical, financial, and other constraints.

- *One change we recommend to this summary section would be the inclusion of detail on our Northwest Ports Clean Air strategy (it is mentioned on page 3-42) and associated implementation plans, as our goal to get to zero emissions by 2050 will contribute significant reductions in air pollutant and GHG emissions. Specifically, we’ll be focusing hard on implementing shore power at our container and cruise terminals, transitioning nonroad cargo-handling equipment fleets to electric and/or hydrogen, and working to help the drayage industry transition to zero emission technologies.*
- One important point you will also see referenced below: *do not include our planned investments in zero-emission equipment as mitigation for additional residential units adjacent to MICs in Alternatives 3 and 4.* We are making these investments in part to account for existing emissions and their impacts on communities. To suggest they could also be used to mitigate for as-yet unseen impacts, brought about by city zoning policy, causes us significant concern.

4-13

Section 2 – Proposal and Alternatives

Based on our analysis of the City’s proposed alternatives, Alternative 2 best aligns with the Port’s commitment to preserving and strengthening industrial lands.

From the perspective of the Port of Seattle and the Northwest Seaport Alliance we see Alternative 2 strengthening existing protections against incompatible development in the industrial areas while ensuring our guiding principle of “No Net Loss” of industrial lands is upheld. Alternative 2 also includes many of the issues that we have long advocated for at the City, including:

4-14

- Closing loopholes that allow for non-industrial development within the MICs;
- Prohibiting removal of land from MICs except as part of the eight-year comprehensive plan review cycle; and
- Identifying a clear vision for what development around Link Light Rail stations within the City’s MICs will look like, and how it will support industry.

2.2.1 Emerging Factors Affecting Seattle’s MICs

The DEIS should be amended to reflect that Terminal 46 is a facility licensed to the NWSA for container cargo use and will not become a cruise terminal, see recommendation for deletion below. We have requested the City amend this language at each stage of the process, most recently in response to the August 2021 scoping process. *Please correct in the final EIS.*

“Pending Port, Transportation, & New Industrial Building Typology - The City is experiencing several catalysts for further change in industrial areas, including:

4-15

Please delete the following text on page 2-8.

“The Port of Seattle’s plans to redevelop Terminal 46 to hold the world’s largest cruise ships and the U.S. Coast Guard’s proposed expansion of its Base Seattle onto portions of Terminal 46; (p. 2-8)”

Section 2.4 Proposal Action and Alternatives

The DEIS proposes alternative maps showing land use concepts in Exhibits 2.4-12, 2.4-18 and 2.4-24. The maps anticipate construction of Light Rail stations at Smith Cove, Interbay, and Ballard, consistent with current planning documents published by Sound Transit, which reach Ballard by 2037-39. However, the same planning documents also discuss “Minimum Operable Segments” and contemplate an interim terminus at Smith Cove. We have heard that other refinements are being considered by Sound Transit.

4-16

This generated the following questions for Port/NWSA staff during review:

- How is the City using the EIS process to ensure that the land use development corresponds to the high-capacity transit (Ballard Link Extension) development?
- How would the land use concepts be applied to ensure correspondence between development and High-Capacity Transit service, in location and the right timeline?

Please ensure that the final EIS provides contingency concepts in the case of delayed development past 2037-39 of the Interbay and Ballard stations, and potential for alternative station sites. A similar analysis should be completed in the SODO area in case an interim terminus occurs at SODO/Lander.

4-16
cont.

Section 2.4.1 Land Use Concepts

- Maritime, Manufacturing, and Logistics; Industry and Innovation – The Port and NWSA support the vision proposed by these land use concepts generally. We appreciate the willingness of City staff to work with us on a consensus vision for transit-oriented development in industrial zones. Pursuing high-density employment uses and providing workers with amenities nearby can maximize transit use without courting incompatible development such as residential in the industrial core.
- Urban Industrial – Port and NWSA staff make the following observation about the adoption of an “Urban Industrial” zone: the Industrial Buffer zone, which would be replaced by UI, was intended as a buffer between industrial zones and incompatible uses such as a housing. Placing substantial housing within the Industrial Buffer zone, as Alternatives 3 and 4 contemplate, reduces its effectiveness as a buffer by bringing the incompatible uses into the zone. The DEIS acknowledges this in its discussion of the air quality and public health impacts in Section 3.8, but *we recommend an acknowledgement of the “incompatible uses in a buffer zone” issue in this section.*

4-17

Section 3 – Environment, Impact, and Mitigation Measures

- We project that many of the proposed mitigation measures will generate significant costs to public entities implementing these policies. *We request the inclusion of cost estimates for each of the mitigation measures identified.*
- Further, we observe that many of the mitigation measures discussed are already underway—for example, the reference to shore power as a mitigation for emissions from industrial activity (Pg. 3-79). *We dispute the inclusion of such measures, as they should not be viewed as mitigation for future consequences of upzones, but rather are initiatives we are already undertaking to minimize the current and future impact of port operations and should be considered in the no-action alternative.*
- Additionally, truck charging is mentioned on Page 3-81, where it is suggested that “The City and the Port of Seattle could expand on the effort to establish multiple such facilities in strategic locations in proximity to Port terminals that require drayage.” The Northwest Seaport Alliance is already in the process of developing plans for converting its drayage fleet, so while we welcome partnership *we request that this not be considered a mitigation measure for future impacts generated by zoning changes contemplated in Alternatives 3 and 4.*

4-18

Section 3.2.1 Air Quality and GHG - Affected Environment

On Page 3-27, the DEIS notes that “eight sites within the BINMIC and the Duwamish MIC were monitored directly...” *We recommend inclusion of summary information regarding what was monitored at those sites and what methodology was used in that monitoring.*

4-19

On Page 3-34, the DEIS states that “Drayage trucking (local trucking that moves shipping containers between Port of Seattle ship terminals and distributions centers in Seattle, Kent Valley, and elsewhere) represents a sizeable portion of local trucking in the MICs.” We would like to see more information behind the data and methods that support that determination. Our staff have understood that one challenge in addressing impact of drayage trucking is that we do not have a definitive number of what percentages of overall truck trips are completed by drayage trucks.

Also on Page 3-34, the document states “Older truck fleets are undergoing turnover to newer truck fleets and cleaner burning fuels.” We have dedicated resources and staff time to helping that turnover happen and recommend inclusion of data and reporting from the NWSA’s Clean Truck Program, which transitioned the drayage fleet to year 2007 model or newer truck engines.

4-19
cont.

On Page 3-42, we appreciate the mention of the Northwest Ports Clean Air Strategy. Recommend including confirmation that The Northwest Seaport Alliance is also a member, given the majority of the port-related emissions addressed by the strategy are generated at NWSA-licensed facilities.

Section 3.2.3 Air Quality and GHG - Mitigation Measures

On Page 3-79, we suspect that the reference to Terminal 15 at the bottom of the page is intended to reference Terminal 5. *Recommend correcting this reference to avoid confusion.*

Also on Page 3-79, the DEIS suggests that the City’s Comprehensive Plan or subarea plan could “include policy guidance that recommends supports the electrification of industrial and maritime activities.” While we would welcome such guidance as consistent with our existing policies and development plans, we also observe respectfully that substantial public investment is needed to help accelerate the electrification of maritime and industrial activities. Policy guidance that is accompanied by funding partnership to support our existing electrification efforts would be welcome and would certainly have an impact on the speed at which we can make these upgrades. Regulatory policies without adequate funding, however, may have adverse economic impacts, and therefore are not desired.

4-20

Section 3.3.2 Water Resources – Impacts

Port/NWSA staff agree with the analysis; because Seattle’s updated stormwater code will drive improvements to stormwater quality under all alternatives that involve re-development. The alternatives that encompass larger areas could yield greater stormwater quantity and quality improvements.

4-21

Section 3.8 Land and Shoreline Use

We appreciate the discussion around the metric of percent of MIC jobs that are industrial in nature. The discussion correctly points out that this metric plays a role in the regional planning paradigm. *Because of this, the discussion should state that the City will adhere to Puget Sound Regional Council’s methodology for distinguishing industrial from non-industrial jobs. At present the discussion only refers to the methodology of the 2019 CAI study (p. 3-271).*

4-22

Section 3.9 Housing

The Port/NWSA are opposed to any traditional forms of residential use in industrial zones. We appreciate that the UI residential allowances in Alternatives 3 and 4 have safeguards intended to make the resulting residential units industry-supportive, such as the cap on the percent of floor area in residential use. Please note that the response from the development sector will be highly sensitive to the extent of these safeguards. As a result, SEPA clearance for this proposal will be moot if the safeguards are stripped down the road, since a completely different level of impacts will occur.

In addition, the application of the term “industry-supportive housing” could create new loopholes that allow for incompatible development in industrial areas, just as the DEIS contemplates closing major loopholes in other areas, i.e., in the Maritime, Manufacturing, and Logistics zone.

3.9.1 Housing - Affected Environment

On Page 3-320, the DEIS includes “Housing Production Trends” in the City, and notes that “nearly all of Seattle’s capacity for residential growth is in villages/centers and corridors with mixed-use and multifamily zoning.” The section also notes that housing development has not kept pace with job growth.

We recommend the inclusion of data on the current un-built capacity within the areas referenced above, as an important indicator of how much additional housing could come online within areas that are currently zoned residential. For example, we know that there are areas already designated as urban villages within the City that have not achieved the maximum number of units allowed under City zoning.

This EIS must include a report on how much more housing can be put into the residential zones before it contemplates adding housing to industrial zones.

Section 3.9.2 Housing - Impacts

On Page 3-339 and on Page 3-341, the DEIS suggests that “air quality and noise mitigation measures (Sections 3.2 and 3.6) could help reduce potential impacts of housing located in or near the study area.” We suggested this concern in our response to the overall “Environment, Impact, and Mitigation measures” section, but we emphasize it here:

The air quality and noise mitigation measures mentioned in Sections 3.2 and 3.6 of the report in many cases rely on efforts that are already underway by the Port and the Northwest Seaport Alliance.

We feel strongly that investments already planned or underway should not be considered potential mitigation for future impacts that would result from zoning changes contemplated by Alternatives 3 and 4. We have made aggressive investments to address emissions and impacts of our operations and continue to do so. But those investments are intended to address existing impacts of Port operations, not future impacts that could be easily avoided by the City simply not pursuing incompatible development.

Section 3.10 Transportation

Freight mobility is critical to the continued success of the MICs. We are concerned that the Transportation Chapter of the DEIS does not provide the same level of information on the freight system as other modes, nor does it explicitly address freight mobility needs. From our perspective, the DEIS

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should include greater recognition of the existing truck street network and both City and Puget Sound Regional Council (PSRC) policy guidance regarding the treatment of truck streets in the MICs:

- The goal of the Maritime Industrial Strategy is to maintain and grow the industry, with related economic and job benefits to the City and region. This requires accounting for and supporting the projected growth of freight volumes in, and on, the access routes to MICs. Yet, the DEIS appears focused on supporting and increasing the number of person trips without a concurrent effort to support increased freight volumes. *Recommend substantial reworking of the transportation section to prioritize freight mobility, consistent with the goals of the EIS.*
- The Duwamish MIC, the most productive MIC in Washington, is anchored by marine container and breakbulk facilities and three major rail yards for the transfer of freight between rail, truck, and ship that could not be replaced anywhere else. *Please acknowledge the role of these essential facilities in the transportation system of the MIC in the introductory section.*
- The City of Seattle’s Freight Master Plan includes a map illustrating both the location and the hierarchy of the City’s truck street network, yet it is not shown in the DEIS. *We recommend that the analysis provide information on the impacts of different alternatives—and the mitigation measures for other modes—on the freight system. We further recommend that the analysis include Major Truck Streets, NHS Freight Intermodal Connectors and Critical Urban Freight Corridors designated by USDOT, and the City’s Heavy Haul network.*
- *We recommend the DEIS reflect the City’s [Complete Streets Ordinance \(City of Seattle Ordinance No. 122386\)](#) prioritizing freight on the City’s Major Truck Streets.:*

“Section 3. Because freight is important to the basic economy of the City and has unique right-of-way needs to support that role, freight will be the major priority on streets classified as Major Truck Streets. Complete Street improvements that are consistent with freight mobility but also support other modes may be considered on these streets.”

- *We would like to see the final EIS align with requirements for the two MICs’ Subarea Plans to:*
“Prioritize transportation projects that provide access to freight intermodal facilities to optimize freight movement for local, regional, and national distribution (including rail, trucking facilities, or waterways, as appropriate).”

Based on our review, the current approach to the EIS does not meet this requirement.

Data & Methods

Overall, this section does not contain a mention of freight, yet efficient and reliable freight mobility is a critical underpinning to the success of any MIC. *Please add a freight subsection.*

Additional recommendations include:

- The Seattle Industrial Areas Freight Access Project, completed by the City and the Port in May 2015, provides analysis of freight in these very industrial areas that can be updated for

4-24

4-25

information in the past six years and provide the appropriate context:

https://www.seattle.gov/documents/Departments/SDOT/FreightProgram/FAP_Report_ExecutiveSummary.pdf

Reference to this project, and the data and strategies included within it, should be included in the transportation section of the EIS.

- It is not clear whether the maps (which are missing the legend for the corridors under analysis) cover all relevant major freight corridors. A review of WSDOT's most recent Freight and Goods Transportation System (FGTS) data can help begin to identify these corridors. *We would be happy to work with you to ensure that all important corridors are evaluated.*
- *Please add an analysis of the reliability of travel time for freight to the final EIS.* While travel time is a useful metric for truck mobility, it does not sufficiently reflect the impact of various alternatives on the cargo movement in the MICs.
- The screenlines in the Duwamish MIC do not sufficiently evaluate the impacts of the alternatives on east-west mobility, they appear focused exclusively on north-south movement. *We would be happy to help you identify appropriate east-west screenlines.*

4-25
cont.

Current Policy & Regulatory Framework

- *We recommend adding the following information to the section on the Freight Plan:*

Like other modal plans, the Freight Master Plan documents the existing truck street network, outlines priorities, and provides freight supportive projects within the two MICs—on corridors connecting the MICs to the freeway system, as well as on the corridors connecting the MICs. Unlike other modal plans, the Freight Master Plan was also the first modal plan that overlaid the truck street system with other modal systems with the goal of facilitating better understanding of the potential for modal conflicts.

- *Please focus the Capital Improvement Program (CIP) section on the types of projects that are relevant for access to, and movement within, the MICs.* This should include all phases of the East Marginal Way Rehabilitation project and the work on both West Seattle bridges.
- *Please include guidance from the City's [Complete Streets Ordinance](#) (noted above) that prioritizes freight on the City's Major Truck Streets in this section:*

“Section 3. Because freight is important to the basic economy of the City and has unique right-of-way needs to support that role, freight will be the major priority on streets classified as Major Truck Streets. Complete Street improvements that are consistent with freight mobility but also support other modes may be considered on these streets.”

4-26

- *Please include information from PSRC’s Regional Centers Framework and Plan Review Manual that provide detailed guidance on the importance for MIC plan development including prioritizing freight projects. Also, the Duwamish MIC is a PSRC designated Employment MIC, which requires the presence of “Industrial-related infrastructure that would be irreplaceable elsewhere, such as working maritime port facilities, air and rail freight facilities”. The Plan Review Manual provides detailed guidance on the importance of prioritizing freight projects.*

4-26
cont.

Current Conditions

- *We recommend reordering the information in this section with items most relevant to the MICs being presented first, such as freight. Furthermore, we recommend providing a section dedicated to freight, rather than combining it with cars. We recommend considering information from the 2015 Seattle Industrial Areas Freight Access Project, https://www.seattle.gov/documents/Departments/SDOT/FreightProgram/FAP_Report_ExecutiveSummary.pdf, and would be happy to assist with additional information to support this new subsection.*
- *We recommend adding more information to the Freight Network Map including:*
 - The presence of major marine and rail intermodal cargo facilities in the Duwamish. They are an integral part of the freight system and should be noted on the map.
 - A hierarchy of truck streets, which is important in the application of Complete Streets treatments in the MICs and on corridors supporting them
 - Information on the National Highway System (NHS) Freight Intermodal Connectors and Critical Urban Freight Corridors deemed to be of national importance by USDOT.
- Please note that the biggest time of potential conflict between trucks and other vehicles occurs during morning peak; trucks typically avoid the afternoon peak. The premise stated in the DEIS that AM and PM peaks are distinct, mostly based on the direction of travel, is not necessarily true for trucks. For the analysis of the impacts of different alternatives in the MICs evaluating AM conditions, including a solid truck component is a critical element. We would be happy to discuss how this could be accomplished.
- *Please expand the identification of truck streets with heavy truck volumes to other corridors, especially Atlantic and SW Spokane Streets. It may be worthwhile to add a map of the FGTS system to the document.*
- *Please add a section on truck parking.* Truck parking (both its availability and community impact) is a national, statewide, and local issue—especially surrounding the Duwamish MIC and near-port communities like South Park and Georgetown. SDOT is currently working on solutions to this issue, collaborating with POS/NWSA. It will also be important to account for curb-space required for delivery vehicles.

4-27

Transit

The DEIS notes that existing transit is full in the evening peaks, especially in the Ballard corridor, and service is often limited or not available for early or late shifts, beyond the office commuter peaks. *Please describe in the FEIS how adding additional residential uses potentially with commuter trips (if the workforce housing is not enforced over time) to the industrial areas can be accommodated, given the scarce resources to increase transit capacity.*

4-28

Safety & Active Transportation

The DEIS describes that under the Action Alternatives, more people would be walking, biking, and busing in areas with incomplete networks, resulting in significant adverse impacts to “active transportation” and safety. It points out that collisions with trucks and cars have more fatal and serious injuries, so it’s not surprising that safety in the industrial area is worse. While the ideal would be to complete the networks, until that can be funded and completed, we are concerned that this increased safety conflict will lead away from the city’s Vision Zero goal to eliminate traffic fatalities.

4-29

Section 3.10.2 Transportation - Impacts

Analysis Methodology & Planning Scenarios Evaluated

Based on the introduction to this section, we question the methodology and the relevance of PSRC’s transit model to freight operations and traffic within and around the City’s two MICs. Both the Port of Seattle and the Northwest Seaport Alliance support transit improvements by King County Metro and Sound Transit because they reduce emissions and remove single occupancy vehicle (SOV) trips making more room for freight. However, we are unsure that the use of PSRC’s Transit Model for this analysis is the best tool for this MIC-focused project. We pose the following questions to the City in that regard:

- How does this model account for truck trips on the system?
- How are they classified?

4-30

From our own work we know that employment forecasts are typically poor indicators for truck trips, both for our facilities and warehousing and distribution centers. *For that reason, we request the opportunity to discuss the modifications to the model noted in the introduction to better understand how well it reflects truck trips on the network.*

Thresholds of Significance

- *The DEIS would benefit from a description of the rationale for choosing the criteria and thresholds outlined in this section. Since they are used to evaluate the impacts of the alternatives, a clear description and rationale for each criterion and threshold is imperative for a transparent analysis.*
- *For Level of Service (LOS) and travel time to capture the true impacts of different alternatives on freight mobility, they must ensure that critical freight corridors are included and take the volume of freight moving along these corridors into account.*

- *Please consider adding a travel time reliability metric for freight mobility.*
- Based on the Complete Streets Ordinance, freight mobility has priority on major truck streets. SDOT has been visionary in taking a Complete Corridors approach with major transit corridors. *We recommend using a similar approach for major truck streets and adjusting the active transportation metric accordingly.*

4-30
cont.

Impacts Common to All Alternatives

- *Please add a separate section on freight impacts to this section, preferably at the beginning.* PSRC’s draft Regional Transportation Plan notes that by 2050, freight transported within Washington is forecast to increase by more than 40%, and imports and exports by more than 50%. Most of that freight moves by truck. PSRC’s recent forecast of transportation system performance found that heavy trucks (class 8 and above) are the only type of vehicle forecast to experience a 30% increase in congestion between now and 2050. These types of trucks serve our facilities as well as railyards and warehousing and transload centers in the MICs.

We understand that these freight volume increases are not directly generated by the different alternatives, but we need to understand how they are impacted by the different alternatives. Using the same metric as cars is not a viable approach from our perspective. While it is true that SOV traffic can be supplanted to a degree by increased use of transit and active transportation, freight will still move by truck, and the volume will increase significantly. Please consider the approach of using the more robust truck freight metrics outlined above.

4-31

- Truck parking is in short supply, especially in the Duwamish MIC. Maybe there are opportunities for providing on-street truck parking in some areas that are experiencing an over-supply of parking?
- As the initial introduction to safety noted, truck and bike/ped accidents tend to be more severe than other types of accidents. *It will be important to evaluate the degree to which different alternatives increase the potential for conflict for trucks and non-motorized users, and whether they can be mitigated without negative impacts on freight mobility.*
- Pavement degrades incrementally to a certain degree, then it requires full-scale rehabilitation. As noted in the DEIS, a significant number of miles on major and minor arterials in the MICs already exhibit a Pavement Condition Index rating indicating that they need rehabilitation rather than maintenance. Current funding sources exist to address pavement deterioration before it reaches a failing point—yet these streets aren’t being fixed today. How would the alternatives change or improve today’s reality in the future? *Please describe in the FEIS how this condition, this lack of maintenance in light of existing current gas taxes and license fees, would impact future development alternatives or be mitigated?*

- In addition to the impacts common to all alternatives noted in the DEIS, the following comments also apply to all alternatives. *Please:*
 - *Add a freight impact section at the top of the analysis for each alternative, accounting for the freight-specific criteria listed above.*
 - *Carry out the analysis for the AM peak when there is most conflict between general purpose and freight traffic.*
 - *Be sure to include all critical truck corridors in the analysis.*
 - *Incorporate the increase in truck traffic outlined above in the analysis. A higher number and percentage of trucks in the fleet mix will increase travel times, all other factors remaining equal. Please account for these changes in the freight section of the alternatives analysis.*
 - *See earlier comments regarding the screenlines in the Duwamish MIC.*
 - *Add at-grade rail crossing safety to the safety criterion.*

4-32

Impacts of Alternatives 3 and 4

- We are very concerned about one passage in the discussion of mitigation, which comes on Page 3-426. In that section, the DEIS suggests that any impact on travel time on I-5 generated by Alternatives 3 and 4 could be mitigated through a reduction in employment in SODO: “Modifications to Alternatives 3 and 4 that reduce the total amount of future employment in the SODO subarea could potentially mitigate the impact to I-5.”

The premise of this concerns us, as the goal of the Industrial and Maritime Strategy was to promote the success of the industrial and maritime sector and grow economic opportunity in the study area. Therefore, considering a reduction in jobs in one of the study areas as a potential mitigating factor for traffic generated through a city zoning change is directly contrary to the founding objectives of this work.

- The DEIS describes impacts to a limited number of arterials in the industrial areas and freeway on-ramps but does not account for traffic diversion that occurs on many corridors at LOS F— to a minor arterial network where a high percent of the streets are major truck streets. Adding residential traffic on major truck streets is not supportive of the Maritime Industrial Strategy’s goal of supporting a growing industrial area.
- Due to greater growth in Alternatives 3 and 4, there would be significant impacts to vehicle movement and travel time on: 15th between the Ship Canal and Leary Way, to Dravus St between 15th-20th, and on I-5 from Madison to SR599 (Tukwila). This means not only trucks and cars, but also buses, get stuck in congestion. This creates an effect where the buses being operated to carry new residents get stuck in gridlock, resulting in needing more buses and

4-33

drivers to carry more people. Similarly, resulting from the greater growth in these alternatives, the trucks will take longer to deliver and pick up their loads – requiring more trucks and compounding congestion. This is not supportive of a strong and growing industrial/maritime sector.

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cont.

Summary of Impacts

- The impacts of the No Action alternative indicate that there is a need for additional capacity along many major corridors within and supporting the MICs. While addressing this issue is not directly related to the alternatives, it does make a case for the City to pay greater attention to its MICs to ensure that they can continue to support the City’s economic and job growth goals in the future.
- None of the alternative analysis sections provide enough information on active transportation, freight, or safety; and it would be helpful to provide more detail on the impacts of these in each alternative to support the conclusions provided.

4-34

Section 3.10.3 Transportation - Mitigation Measures

- *In the introduction to this section please mention that maintaining and improving freight mobility is critical and requires transportation infrastructure and transportation systems management for the MICs.*
- The EIS offers mitigation, but notes that since this is a programmatic EIS, and these are applied at the development level, they cannot measure effectiveness at this stage in the process.



Incorporated Plan Features

- Please note that none of the development standards listed in this section provide direct benefits to freight mobility, truck parking, or delivery. This means that any negative impacts to freight mobility would need to be financed by scarce public sources. It will be important to ensure these funds are available for this purpose. POS/NWSA staff already work productively with their SDOT counterparts on these issues and look forward to even greater collaboration and emphasis.

4-35

Regulations & Commitments

- Again, while it is important to ensure good access to jobs for workers in the MICs, these jobs—and the tax revenue from the maritime industrial sector—would not exist without an efficient and reliable freight system.

Freight

- *Please add a section dedicated to freight mitigation to this section.* This should include reference to projects outlined in the Freight Master Plan, similar to the section on active transportation.

Transportation Systems Management and Operations (TSMO)

- Intelligent Transportation Systems (ITS) and TSMO applications that mitigate truck travel time increases in critical truck freight corridors—including NHS Intermodal and other last mile connectors and will be a critical element in ensuring our MICs can thrive. This should also include truck-specific notifications for incidents and major points of congestion on the freight system.

Travel Demand Management (TDM)

- The Port/NWSA support rules that would tailor TDM requirements to those most effective in industrial settings, while keeping the safety of workers in mind: many industrial workers work night shift.
- Parking policies in the MICs must take the needs of workers, trucks, delivery and service vehicles, and business customers into account. Some of the potential parking requirements outlined in the TDM could have a negative impact on the most critical parking needs. Their implementation must be carefully evaluated.

Pedestrian & Bicycle System Improvements

- If the DEIS has identified potentially significant gaps in the bike and pedestrian system within and providing access to the MICs, they should be listed in the respective sections. The Freight Master Plan can serve as initial basis for identifying potential areas of modal conflict to be further evaluated during more detailed planning and analysis efforts.

4-36

Parking Strategies

- Please consider that a MIC is not a neighborhood in the traditional sense. We have already noted that (large) truck parking (which is prohibited from parking outside industrial areas by the City of Seattle and most local jurisdictions in King and Pierce County) and curb-side management that addresses the needs of delivery vehicles will be important elements of any menu of parking strategies for the MICs.

Safety

- *Please add a safety subsection to the DEIS mitigation section.* The interaction between heavy trucks, cars and active transportation users, as well as the presence of at-grade rail crossings make the development of robust safety measures that protect vulnerable users (without degrading freight mobility) a priority.

Potential Mitigation Measure Funding

- Business Improvement Areas (BIA), developer contributions, and Tax Increment Financing (TIF) can help fund needed transportation projects. However, due to their very nature, these funding sources are unlikely to address major transportation system improvement needs, let alone help reduce existing system gaps or maintenance and rehabilitation needs.

- The congestion on Dravus (adjacent to the new Interbay Link Station) is proposed to be mitigated by widening or replacing the Dravus Bridge – which has not been proposed in any funding plan. Meanwhile, the Ballard and Magnolia Bridges have been studied in local and state studies for years and are still not funded. We are concerned there would not be adequate funding prioritized for a third bridge replacement.
- As with other environmental elements, the DEIS says that transportation mitigation could be paid for with developer payments (impact fees, a BIA to form a Transportation Management Association, etc.) These transportation mitigation fees will impact the development financial pro formas and risk the ability to fund such development. The cost of transportation mitigation is only one cost along with other environmental fees proposed in other sections of the DEIS.

4-36
cont.

Other Potential Mitigation Measures

- ITS and TSMO improvements, similar to those described for W Dravus St and I-5, will also be needed in other corridors that serve as the backbone of the City's freight system.
- The DEIS proposes TSMO, TDM, and walking/biking improvements as ways to offset the travel time impact and congestion, however there is no effort to demonstrate how much the impacts can be mitigated. We are concerned this will not sufficiently solve the problem and question whether there is enough funding to complete it. Note, the EIS says there's \$14 million over nine years for Freight Spot Improvements in the Levy to Move Seattle. A current Port/City project upgrades eight intersections along two corridors for \$4.2 million, leading us to assess that the \$14 million will not cover many intersections around the MICs.
- There is no mitigation for the 6% travel time increase (relative to No Action) on Interstate-5, the EIS says in effect, that's the state's facility/problem.
- Another potential mitigation is creating bus and freight Lanes (previously proposed on 15th Ave W), yet the EIS acknowledges that conversion of existing travel lanes to "freight/transit only," will make the situation worse for cars, and increase the delays. It is also not clear whether these lanes are beneficial on every corridor, their value will need to be analyzed on a case-by-case basis.
- The DEIS acknowledges that pavement issues would be worse with more development, but that gas tax and weight-based license vehicle license fees exist to fix pavement. We note that this hasn't been effective to date in the Duwamish. Six years ago, the Port and City developed an intergovernmental agreement to fund the Heavy Haul Network for container drayage activity, but the funding identified has yet to be invested in new pavement.

4-37

Section 3.10.4 Transportation - Significant Unavoidable Adverse Impacts

Please provide more detail on unavoidable adverse impacts, in particular those that affect freight mobility under Alternatives 3 & 4. Transportation is not an end in itself; it is a means to broader goals; in this case transportation is supporting maritime industrial business in the MICs. If certain scenarios are detrimental to the broader goals, they should not be considered, especially if there are alternatives to achieving the equity and housing goals reflected in these alternatives. This is one of the major factors for preferring Alternative 2.

4-38

Section 3.14 Utilities

- *Pg. 3-528: Acknowledges the Port's Marine Stormwater Utility, but our review suggests that this section does not include Port's stormwater pipes in their length table (Exhibit 3.14-4). Since Port properties cover significant area within the project area, the Port's Stormwater Utility would be willing to provide more specific information to inform the final EIS.*
- *Please note that Pg. 3-529: Exhibit 3.14-5 doesn't accurately depict stormwater system lines (from comparing with the Port's Stormwater mapping on GIS there's a mix of City of Seattle/King County and Port, but is incomplete relative to the Port's mapping records, which are shared with the City). Terminal 91 and Terminal 5 show stormwater lines that are managed by Port, and Terminal 18 doesn't show anything (there are both Port of Seattle and City of Seattle lines within the Terminal 18 property).*

4-39

###

Holmes, Jim

From: Erik Saganić <ErikS@pscleanair.gov>
Sent: Friday, February 18, 2022 11:31 AM
To: PCD_Industry_And_Maritime_Strategy
Subject: Industrial and Maritime Strategy DEIS Comment
Attachments: SeattleIndustMaritimeDEIScommentletter.pdf

CAUTION: External Email

Please find the attached comment letter, thank you, Erik Saganic



PUGET SOUND
Clean Air Agency

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February 18, 2022

City of Seattle Office of Planning & Community Development

To whom it may concern,

Re: Industrial and Maritime Strategy DEIS Comment

Thank you for the opportunity to comment. We've reviewed the DEIS, and would like more clarity in the final EIS on the items below:

- Dust impacts from increased VMT in the area is not covered in the DEIS. We request this be included. The soils in the Duwamish Valley are notoriously fine, therefore very dusty, and with many unpaved curbs and no sidewalks in many areas, which could result in increased dust/PM₁₀ impacts in certain locations. There has been a lot of attention on this issue in the community over the years, such as the community's metals-in-moss study and the need for routine street sweeping on 8th Ave S.
- Exhibit 3.2-5, is this a maximum value, 99thile (the form of the standard), or an average of all the 24-hour values? The levels for a year look like they may be all averaged. Unclear from the text and figure descriptions what this represents. We request this be clarified in the final EIS.
- Exhibit 3.2-6, it is unclear what the source of the RSL is. When we spot checked it, the values don't seem to match with this source (<https://semspub.epa.gov/work/HQ/401647.pdf>). Example: in the pdf link included here, arsenic has a RSL of 0.00065 µg/m³. The DEIS report has 0.002 µg/m³. The Washington Acceptable Source Impact Level is 0.0003 µg/m³. Please include the source for each RSL listed.
- The details and raw data from the air sampling should be shared publicly via a link or in the final EIS, including detection limits. Unclear if the detection limits are above the RSL's here. Also, if the detection limit is over the RSL, include how many times higher than the RSL.
- "The Puget Sound region, including the industrial and maritime areas of Seattle, is currently classified as an attainment area for

5-1

5-2

5-3

5-4

5-5

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Joe Bushnell
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Executive Director

Cynthia Wang

ozone, NOx, lead, particulate matter and SO₂.” Tacoma is technically in “attainment with maintenance provisions” for PM_{2.5}.

5-5 cont.

- In the alternatives, denser housing is included. Please include where this may be located in the Duwamish Valley, what increased sources of pollution the denser housing may be exposed to (major truck corridor?), what that may mean for air quality impacts to those specific areas, and potential for air quality mitigation options for those areas.

5-6

Thank you again for your consideration,

Erik Saganic, Technical Analysis Manager



Holmes, Jim

From: Liz Underwood-Bultmann <LUnderwood-Bultmann@psrc.org>
Sent: Wednesday, March 02, 2022 4:47 PM
To: Holmes, Jim
Cc: Paul Inghram
Subject: FW: PSRC Comments on DEIS for Seattle's Industrial and Maritime Strategy
Attachments: PSRC Comment Ltr Seattle Maritime DEIS.pdf

CAUTION: External Email

Hi Jim,

I got an undeliverable message when I sent to the official inbox (flagged as suspected spam) – I’ll try to resend, but forwarding on to you as well.

Thanks,

Liz

Liz Underwood-Bultmann, AICP (she/her) | Principal Planner | Puget Sound Regional Council
1011 Western Ave Ste 500 | Seattle, WA 98104
206.464.6174 office | LUnderwood-Bultmann@psrc.org

From: Liz Underwood-Bultmann
Sent: Wednesday, March 2, 2022 4:43 PM
To: PCD_Industry_and_Maritime@seattle.gov
Cc: Paul Inghram <PInghram@psrc.org>
Subject: PSRC Comments on DEIS for Seattle's Industrial and Maritime Strategy

Hello,

Please find attached comments from the Puget Sound Regional Council on Seattle’s Industrial and Maritime Strategy DEIS. We look forward to working with the city on this process, and please let us know if you have any questions on these comments.

Best regards,

Liz

Liz Underwood-Bultmann, AICP (she/her) | Principal Planner | Puget Sound Regional Council
1011 Western Ave Ste 500 | Seattle, WA 98104
206.464.6174 office | LUnderwood-Bultmann@psrc.org

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Puget Sound Regional Council

1011 WESTERN AVENUE, SUITE 500 ||| SEATTLE, WA 98104-1035 ||| psrc.org ||| 206-464-7090

March 2, 2022

Jim Holmes
City of Seattle Office of Planning and Community Development
P.O. Box 94788
Seattle, WA 98124-7088

Subject: PSRC Comments on Draft Environmental Impact Statement (EIS) for Seattle's Industrial and Maritime Strategy

Dear Mr. Holmes,

Thank you for the opportunity to weigh in on environmental review for Seattle's industrial and maritime strategy. We appreciate the work the city is doing to plan for the long-term success of Ballard-Interbay and Duwamish, which are two of the region's most significant manufacturing centers.

The Puget Sound Regional Council is the four-county regional planning agency that maintains the region's long-range plan – [VISION 2050](#) – and the process for designating regional centers, including manufacturing/industrial centers (MICs). PSRC's [Regional Centers Framework](#) outlines expectations for new and existing regional MICs and PSRC's [Plan Review Manual](#) describes planning expectations and plan certification requirements for MICs. As Ballard-Interbay and Duwamish are two of PSRC's regionally designated MICs, these regional planning documents should guide local planning work, including the environmental review process and subsequent comprehensive plan amendments.

We commend the city for continuing work to develop a guiding strategy for its industrial areas. The Draft EIS is clear and accessible, communicating to stakeholders and the broader public the scale of opportunities and trade-offs between different alternatives.

Seattle was an early leader in the region in designating industrial centers, developing MIC plans, and seeking to preserve industrial uses in the long-term. Demand for other uses, piecemeal land use changes over the years, future light rail expansion and long-term trends in industrial employment have created new challenges and opportunities and require a reassessment of the city's approach. The city's proactive planning is appropriate to respond to change. We encourage

6-1

the city to be thoughtful in meeting regionally-adopted criteria so as to maintain regional designation while balancing a variety of other interests.

6-1
cont.

VISION 2050 and the Regional Centers Framework calls for cities and counties to continue preserving industrial lands and limiting incompatible land uses in manufacturing/industrial centers – at least 75% of land in industrial centers should be zoned for core industrial uses, with commercial uses strictly limited. Furthermore, the Regional Centers Framework criteria for MICs requires a minimum of 50% industrial employment in these centers.

PSRC’s Regional Centers Framework outlines the requirements for maintaining center designation. In particular, Seattle should closely track criteria for maintaining a regionally-significant industrial land use base, share of industrial employment, preserving core industrial uses, and adopting subarea plans consistent with regional criteria. To that end, the following comments on the Draft EIS are intended to help align with MIC designation requirements:

- **Center plans.** Cities with centers are required to adopt or update subarea plans for their MICs prior to 2025 to demonstrate consistency with the Regional Centers Framework. We appreciate that the environmental review recognizes the need to adopt subarea plans to maintain regional center designation. This step is critical for designation, and policies should continue to advance regional planning expectations and meet certification requirements.
- **Housing and incompatible uses.** VISION 2050 states manufacturing/industrial centers are not appropriate for residential uses. The DEIS identifies that Alternatives 3 and 4 introduce increased amount of industry-supportive housing, which can be viewed as inconsistent with some regional and local policies limiting residential uses in MICs. We are concerned about introducing additional incompatible uses in the MIC and encourage the city to limit new housing in these areas, consistent with VISION 2050.
- **Industrial employment.** We appreciate that the Draft EIS includes information and analysis on employment mix in the industrial areas. The draft states, “Employment in the study area and subareas can also be analyzed according to the quantity of jobs in industrial vs. non-industrial classifications. It is not straightforward to classify jobs as industrial or non-industrial. Methods in this analysis are from the 2019 CAI study.” PSRC uses a standardized set of job classifications to identify share of industrial employment. Please see [Appendix B](#) of PSRC’s [Industrial Lands Analysis](#) (2015) for a list of industry sectors. The city should review for consistency with regional definitions – we would be happy to assist in providing information on employment mix as needed.
- **Comprehensive plan policies.** The Draft EIS includes draft policies that may be included in the comprehensive plan. In addition to the policies identified, we would encourage a policy to maintain consistency with adopted regional and county criteria for manufacturing/industrial centers.

6-2

6-3

We support the addition of LU 10.3 (“Ensure predictability and permanence for industrial activities in industrial areas by limiting changes in industrial land use designation. There should be no reclassification of industrial land to a non-industrial land use category except as part of a City-initiated comprehensive study and review of industrial land use policies or as part of a major update to the Comprehensive Plan.”). Piecemeal changes and erosion of land use protections in industrial areas have created challenges for preserving industrial lands and long-term consistency with regional and county goals for MICs. This policy could be further improved by referencing potential updates to city-adopted subarea plans for the MICs. Once the city has adopted subarea plans for the MICs, it is reasonable to contemplate land use changes in conjunction with those subarea plan updates.

6-3
cont.

Thank you for providing this opportunity to comment on the Draft EIS for Seattle’s Industrial and Maritime Strategy, and we look forward to continuing to be involved with this important work. Please don’t hesitate to reach out if we can provide any support or provide any additional information about VISION 2050 and the Regional Centers Framework.

6-4



Paul Inghram, FAICP
Director of Growth Management Planning

Holmes, Jim

From: Panganiban, Justin
Sent: Tuesday, January 25, 2022 3:34 PM
To: Wentlandt, Geoffrey; Holmes, Jim
Subject: FW: Industrial & Maritime DEIS - SDOT Development Review comments
Attachments: SDOT Development Review DEIS Comment Letter 220125.pdf

NOTE: I sent comments to the email address on the [project website](#) but had my message bounced (Outlook says the address cannot be found). Please see the attached comment letter from SDOT Development Review regarding the Industrial and Maritime Strategy DEIS.

Thanks!

From: Panganiban, Justin
Sent: Tuesday, January 25, 2022 3:30 PM
To: PCD_Industry_and_Maritime@Seattle.gov
Subject: Industrial & Maritime DEIS - SDOT Development Review comments

Greetings,

Thank you for the opportunity for SDOT’s Development Review team to provide comment on the Industrial Maritime Strategy Draft EIS. The Development Review team provides early design guidance to developers to better integrate private development with the City’s right-of-way priorities, while implementing the Seattle Land Use Code and guidance outlined in Streets Illustrated.

The Development Review team provides early design guidance and 0-30% street improvement permit (SIP) approval for new development in industrial zones. We are interested in proposed development standards and code language affecting the R.O.W. that are described in the three land use concepts: Maritime, Manufacturing & Logistics (MML), Industry and Innovation (II), and Urban Industrial (UI). We understand that specific code language will be drafted at the time of a future legislative proposal. Our comments reflect analysis gaps in the Draft EIS that can inform updated development standards for these land use concepts, and opportunities to modify pedestrian access, circulation, and frontage requirements under current industrial zoning (as described in Chapter 23.53 of the Land Use Code).

Please see the attached comment letter.

Best,



Justin Panganiban, AICP
Sr. Transportation Planner, Street Use
City of Seattle, Department of Transportation
M: 206-640-6904 | justin.panganiban@seattle.gov
Web | Blog | Facebook | Twitter | Instagram | YouTube | Flickr | Customer Service

He/him



MEMORANDUM

Date: January 25, 2022
To: Geoff Wentlandt & Jim Holmes, Office of Planning and Community Development
From: SDOT Development Review program
Subject: Comments on Industrial Maritime Strategy Draft EIS

Thank you for the opportunity for SDOT’s Development Review team to provide comment on the Industrial Maritime Strategy Draft EIS. The Development Review team provides early design guidance to developers to better integrate private development with the City’s right-of-way priorities, while implementing the Seattle Land Use Code and guidance outlined in Streets Illustrated.

The Development Review team provides early design guidance and 0-30% street improvement permit (SIP) approval for new development in industrial zones. We are interested in proposed development standards and code language affecting the R.O.W. that are described in the three land use concepts: Maritime, Manufacturing & Logistics (MML), Industry and Innovation (II), and Urban Industrial (UI). We understand that specific code language will be drafted at the time of a future legislative proposal. Our comments reflect analysis gaps in the Draft EIS that can inform updated development standards for these land use concepts, and opportunities to modify pedestrian access, circulation, and frontage requirements under current industrial zoning (as described in Chapter 23.53 of the Land Use Code).

7-1

1) **Existing curb ramp and sidewalk conditions.** On page 3-358, the Draft EIS describes City-maintained data layers for sidewalks and curb ramps, which are not shown due to the legibility of maps at the study area level. We recommend more detailed exhibits be included as an appendix item, or for the EIS to provide detailed maps of curb ramps and sidewalk conditions in UI and II zones where multi-modal development standards are proposed. Providing data on the distribution of ADA compliant curb ramps and sidewalks at a closer scale can better identify network gaps and inform street development standards. The current Land Use Code has few levers to require private development in industrial zones to provide curb ramps, curbs, and sidewalks where they are crucial in supporting future land use and transportation patterns.

7-2

2) **Curb ramps.** Curb ramps are not described as code-required pedestrian improvements in the Draft EIS. Current pedestrian access and circulation requirements for industrial zones do not support new curb ramps outside of specific development conditions. We strongly recommend that this effort consider and discuss code updates that can expand curb ramp requirements to improve pedestrian access and circulation in the study area.

7-3

3) **New development requirements.** The Draft EIS describes walking and biking facilities improvements to mitigate the impacts of more people walking and biking in areas with network gaps. The DEIS does not clearly outline how the Land Use Code, and specifically SMC 23.53.006, requires new development to construct pedestrian improvements. New zoning designations provide an opportunity for code updates on pedestrian access and circulation requirements that are better aligned with future land use and transportation patterns. Under current IC and IB zoning, for example, required pedestrian improvements for new development (such as

7-4

sidewalks, curbs, and curb ramps) are limited to arterials, designated streets in the Industrial Streets Landscaping Plan, and developments meeting specific size thresholds. Please include these code references in the EIS, as well as elaborate on how this strategy will shape a future program for private development to implement code-required pedestrian or other modal improvements along their frontage.

7-4 cont.

4) **Street tree requirements in IC/II and IB/UI zones.** The Draft EIS describes street trees as potential frontage improvements in II and UI zones. Street tree requirements under current industrial zoning are limited, such as in IB zoning, where street trees are only required adjacent to or abutting lots in residential and commercial zones. Will new zoning designations expand street tree requirements to the entire zone?

7-5

5) **Street tree requirements in IG/MML zones.** Under current IG zoning, street trees are not required unless designated in 23.50.016 Map A – Industrial Landscape Streets. Will the list of industrial landscape streets and associated landscape standards be revised to align with future land use and transportation patterns in future MML zoning?

7-6

6) **MML zone street improvements.** The Draft EIS describes “street improvements” as a development standard for MML zoning. Please clarify if streets improvements are intended to be consistent with what is currently required under IG zoning, or if more extensive development standards will be developed to improve pedestrian access, circulation, and safety.

7-7

7) **Curb cut/driveway data.** Starting on page 3-375, the DEIS identifies modal conflicts and collisions near intersections. Does the analysis include documentation and analysis of curb cuts and vehicular access onto private property, and collision data related to turn movements onto private property?

7-8

8) **Coordination with ST3 light rail development standards.** II zoning intends to capture emerging opportunities around expanded or new light rail stations. Transportation mitigations around station areas will be identified through ST3 EIS process, and Sound Transit may be required to provide these improvements as part of an agreed-to mitigation. Consider how standards developed within this body of work is coordinated with ST3 development standards and potential street design concepts for station frontages.

7-9

Please let me know if you have any questions. I can be reached at justin.panganiban@seattle.gov

Justin Panganiban

Development Review Program, Seattle Department of Transportation – Street Use Division

Holmes, Jim

Letter #8

From: Eaves, Christopher
Sent: Wednesday, March 02, 2022 5:11 PM
To: PCD_Industry_And_Maritime_Strategy
Cc: Jeanne.acutanza@wsp.com
Subject: Seattle Freight Advisory Board Comment Re: Industrial and Maritime Strategy, Draft EIS
Attachments: 20220302
_SFAB_Letter_OPCD_Rico_Quirindongo_Seattle_Industrial_Maritime_Strategy_Draft_EIS.p
df

To: Rico Quirindongo, Acting Director OPCD

I am sending the attached comment letter in my capacity as the Seattle Freight Advisory Board (SFAB) Liaison and copying Jeanne Acutanza, SFAB Chair.

Thank you for the opportunity to comment on this important document.

Sincerely

Chris Eaves
SFAB Liaison



City of Seattle

Mayor Bruce Harrell

Seattle
Freight
Advisory
Board

March 2, 2022

- Jeanne Acutanza
- Johan Hellman
- Geri Poor
- Pat Cohn
- Mike Elliott
- Warren Aakervik

Rico Quirindongo, Acting Director
 City of Seattle Office of Planning and Community Development
 700 Fifth Avenue
 PO Box 34996
 Seattle, WA 98124-4996
 Via email: PCD_Industry_And_Maritime_Strategy@seattle.gov

Dear Mr. Quirindongo:

Re: Seattle Industrial Maritime Strategy, Draft EIS

This letter reflects the comments of the Seattle Freight Advisory Board related to the September 2021, Seattle Industrial Maritime Strategy Draft Environmental Impact Statement (DEIS). Thank you for the presentation and materials provided to the Seattle Freight Advisory Board.

As you may know, the Seattle Freight Advisory Board (SFAB) consists of representation from businesses, organizations, public agencies, labor and individuals reflecting various modalities and types of freight systems with a focus on our two large Manufacturing Industrial Centers (MIC). The SFAB was founded by Seattle council resolution providing input to the mayor, city council and all departments on matters related to freight and the impact actions by the city may have on the various freight routes and environment. The SFAB mission includes advocating for the development and preservation of freight infrastructure that supports Seattle's trade-dependent economy.

8-1

Our comments on the Draft EIS are summarized below.

The Draft EIS accurately notes the high density of family-wage jobs that are located in the two Manufacturing Industrial Centers (MICs). As noted in Exhibit 6 of the Land Use Alternatives document, 87% of the 98,400 in the city were located in the MIC. The Transportation Section of the DEIS describes city modal plans and their characteristics. It includes a description of the Major Truck Streets. The MICs are intrinsically linked to our natural deep-water port and the multimodal transportation systems including a heavy haul network, intermodal yards, and mainline and industry rail systems. The success of these important employment centers relies on the preservation and efficacy of all these transportation systems working efficiently together, not just the Major Truck Streets network. The preservation and reliability of the heavy haul network, rail systems, and intermodal yards support the economic viability of industrial and manufacturing uses. The analysis should include all of these systems and the impact of new land uses on these systems. For example, increased rail crossing and modal conflicts. What are the impacts of the proposed land use concepts on the heavy haul network and the rail systems? Further, how do the at-grade rail crossings impact the future alternatives? The State Rail plan developed by WSDOT

8-2

The Seattle Freight Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the City in development of a functional and efficient freight system and on all matters related to freight and the impact that actions by the City may have upon the freight environment.

City Council Resolution
31243

in [2020](#) describes rail crossing needs. This study defines the vision for Washington’s rail system as an integral part of Washington’s multimodal transportation network, the rail system provides for the safe, reliable, and environmentally responsible movement of freight and passengers to ensure the state’s economic vitality and quality of life. The State Rail Plan describes growth in demands for both freight and passenger rail. The EIS should describe the effects of changing land uses on modal conflicts with critical rail networks.

8-2 cont

The parking analysis provides an assessment of general parking issues and potential rail station area parking issues but does not describe parking issues related to the demand for overnight truck parking and the effect of different land uses on the demand for overnight truck parking. Studies by WSDOT in [2021](#) describe the need for truck parking. How do the alternatives accommodate or effect these intermodal drayage and long-haul truck parking needs?

8-3

The safety analysis included in the report describes potential impacts to vulnerable users and describes the increase in vehicle miles travelled resulting in potentially more collisions. The DEIS notes that the types of location-specific measures that can be implemented depending on the context include traffic calming treatments, new traffic signals, separation of facilities for vulnerable users, and hardened centerlines. The FEIS in this industrial area should acknowledge the heightened risk of impacts to pedestrians, cyclists and scooter riders from heavy and/or large vehicles (like trucks, which are inherent to industrial operations). Specifically, truck drivers operate with limited range of sight distance and with turning radii conflicts that aren’t expected from smaller vehicles, and those vulnerable users must be aware to expect different operations from large trucks (e.g., WB-67s). The report does not address/describe the types of strategies needed to maintain safe mobility for all users like separation of vulnerable modes and does not assess the effects of different land uses on safety. If alternatives increase conflicts with vulnerable users, there should be identification to the impact and potential mitigation.


8-4

Mitigation in this Programmatic DEIS is not applied or described in enough detail to know whether it will resolve the impacts mentioned; or result in indirect and/or secondary impacts to industrial land access. Yet, there are many references to potential mitigation. In the FEIS, please address the likelihood that the mitigation would resolve or successfully lessen the negative impacts identified. Please further address the cumulative cost of the various mitigation, who bears those costs, and what the impact is on those payers in terms of what they must not otherwise fund.

8-5

The Freight Board is prepared to support the further development of impacts and mitigation and to support the decision on a preferred alternative.

Sincerely,
Jeanne Acutanza



Chair,
Seattle Freight Advisory Board

Holmes, Jim

From: Murdock, Vanessa
Sent: Friday, February 18, 2022 8:14 AM
To: PCD_Industry_And_Maritime_Strategy
Cc: Harrell, Bruce; Burgess, Tim; Juarez, Debora; Herbold, Lisa; Morales, Tammy; Mosqueda, Teresa; Sawant, Kshama; Strauss, Dan; Pedersen, Alex; Nelson, Sara; Pennucci, Aly; Lewis, Andrew
Subject: Seattle Planning Commission comments on the Industrial Maritime Strategy Draft EIS attached
Attachments: Seattle Planning Commission Industrial Maritime Strategy DEIS comments.pdf

Please contact me should you have any questions.
Kind regards,
Vanessa



Vanessa Murdock

Preferred pronouns: she/her/hers

Seattle Planning Commission | Executive Director

Vanessa.murdock@seattle.gov

<http://www.seattle.gov/planningcommission/>



City of Seattle

Seattle Planning Commission

February 18 2022

Sent via e-mail: PCD_Industry_And_Maritime_Strategy@seattle.gov

Subject: Seattle Planning Commission comments on the Industrial and Maritime Strategy Draft EIS

The Seattle Planning Commission appreciates the opportunity to comment on the Industrial and Maritime Strategy Draft Environmental Impact Statement (DEIS). We offer these comments as stewards of the Seattle Comprehensive Plan and have based them on our discussions regarding this topic during the past and current development of the Industrial and Maritime Strategy including the most recent recommendations.

Executive Summary

- Environmental analysis of the Industrial and Maritime Strategy must ensure that any zoning proposals move to repair the harms of the past and benefit affected communities through both public and private investment.
- The Planning Commission recommends specifically identifying the key differences between the two M/ICs when documenting impacts and proposing mitigation measures for each.
- We recommend that the EIS identify how much total industrial space is needed for the City to reach its growth projections, identify the impacts of protecting industrial and maritime lands, reference potential displacement pressures, and identify the benefits of anti-displacement measures and incentives.
- The Planning Commission has significant concerns with the broad impacts on housing citywide and throughout the region resulting from increased employment growth under the Action Alternatives. We are concerned that the proposed mitigation measures may not be sufficient to address the housing needs associated with the significant job growth.
- We request that the EIS clearly identify how future light rail stations will interact with the surrounding and/or adjacent industrial and maritime lands. Analyze the potentially competing demands of protecting industrial lands and robust ridership at all station locations.
- The EIS should identify what types of transportation capital projects are required to keep pace with the change in jobs resulting from the Action Alternatives, conduct an equity analysis to identify impacts from conflicts between freight traffic and other modes in communities without sufficient non-motorized infrastructure, and conduct an inventory and gap analysis of walking and biking facilities in industrial areas, especially around future light rail stations.

Commissioners

Rick Mohler, *Co-Chair*

Jamie Stroble, *Co-Chair*

Mark Braseth

McCaela Daffern

Roque Deherrera

David Goldberg

Matt Hutchins

Patience Malaba

Radhika Nair

Alanna Peterson

Dhyana Quintanar

Julio Sanchez

Lauren Squires

Rose Lew Tsai-LeWhitson

9-1

Staff

Vanessa Murdock
Executive Director

Olivia Baker
Policy Analyst

John Hoey,
Senior Policy Analyst

Robin Magonegil
Administrative Analyst

- The Planning Commission strongly suggests directly soliciting feedback from potentially affected tribes beyond “distribution” of the DEIS. The tribes should be consulted to identify areas of cultural significance, industrial uses that could create physical or economic impacts to tribal fisheries, natural or cultural resources, and help develop appropriate mitigation strategies. We recommend explicit recognition of impacts to the cultural and historic importance of indigenous land, including the ancestral lands of the Duwamish, Suquamish, Stillaguamish, and Muckleshoot Tribes.

9-2

Equity and Environmental Justice

Additional Analysis Needed:

- Specifically identify the key differences between the two M/ICs when documenting impacts and proposing mitigation measures for each.
- Analyze environmental health impacts to both residents and workers in the Duwamish Valley from exposures to environmental hazards such as air pollution, contamination, and noise.
- Recognize that more new jobs will be created in the BINMIC than in the Duwamish Valley under the proposed alternatives.

Requested Mitigation:

- Evaluate mitigation strategies that will enable BIPOC and gender-inclusive access to job opportunities in Ballard and Interbay and increase opportunities in the Duwamish Valley.

9-3

The Planning Commission applauds inclusion of an Equity and Environmental Justice lens throughout the DEIS. Seattle’s industrial and maritime history as well as the current Manufacturing/Industrial Center (M/IC) land use structure perpetuates a legacy of institutionalized racism and environmental injustice. A key objective of the Industrial and Maritime Strategy will be to reduce the legacy of negative environmental impacts to the Duwamish Tribe and communities such as South Park and Georgetown from industrial activities and historic zoning approaches such as redlining. These communities were especially impacted by adjacent industrial activity before creation of environmental regulations such as the Clean Air Act and Clean Water Act. **Environmental analysis of the Industrial and Maritime Strategy must ensure that any zoning proposals move to repair the harms of the past and benefit affected communities through both public and private investment.**

Existing inequities in industrial and maritime areas are exacerbated when considering the differences between current and future conditions in the Ballard/Interbay/Northend M/IC (BINMIC) and the Greater Duwamish M/IC. The Greater Duwamish M/IC has a long history of pollution and contamination that has affected the adjacent communities and natural resources of the area, most significantly the Duwamish River which has been designated as a Superfund cleanup site. Many people who catch and consume fish from the Duwamish River are low-income recreational and/or subsistence fishers, including Native American communities or first-generation immigrants and their

families. Industrial activity in the BINMIC has historically been limited to a smaller geographic area and mix of uses. **The EIS should specifically identify this disparity when documenting impacts and proposing mitigation measures for each of the two M/ICs. While this analysis may exist within individual chapters of the EIS, we recommend that the Summary chapter and introductions to each major chapter address the differences between the M/ICs.**

We appreciate that the DEIS considers how the alternatives advance the City's Equity and Environment Agenda as well as the Duwamish Valley Program and Action Plan by screening whether the alternatives would increase, exacerbate, or impede mitigation of environmental justice. The Planning Commission commends the City for listening to the Duwamish Valley communities in crafting zoning proposals consistent with these communities' desires. **We respectfully request the analysis of environmental health impacts to both residents and workers in these areas from exposures to environmental hazards such as air pollution, contamination, and noise under all alternatives in the Final EIS.**

9-3 cont.

The equitable future of Seattle's industrial and maritime lands requires assessing emerging trends in labor and workforce development and providing access to workforce education and pathways out of poverty. As a pipeline to living wage jobs, workforce development is critical to realizing the equity benefits of this proposal. Educational outreach and workforce recruitment for industrial and maritime jobs should include those impacted by industry-related injustices, including the South Park and Georgetown communities, the Duwamish Tribe, and other tribes. **The EIS should recognize that more new jobs will be created in the BINMIC than in the Duwamish Valley under the proposed alternatives. It should also identify adjustments to the alternatives as appropriate, evaluate mitigation strategies that will enable BIPOC and gender-inclusive access to job opportunities in Ballard and Interbay, and increase opportunities in the Duwamish Valley and Georgetown.**

Comments on Alternatives, Elements, Impacts, and Mitigation Measures

Land and Shoreline Use

- We strongly support the proposal to strengthen protections for industrially zoned lands within Seattle by establishing higher thresholds to remove industrial land designations and closing loopholes that have allowed significant non-industrial development within industrially zoned lands.
- We also strongly commend the long-awaited solution to close loopholes that have allowed significant non-industrial development within industrially zoned lands.

9-4

Additional Analysis Needed:

- Identify how much total industrial space is needed for the City to reach its growth projections.
- Specifically identify which of the sub-areas studied will likely receive job growth and require additional investment and how this may create or exacerbate economic segregation impacts.

- Identify the impacts of protecting industrial and maritime lands, reference potential displacement pressures, and identify the benefits of anti-displacement measures and incentives.
- Analyze the regional economic impact of combining land usable for manufacturing jobs with other uses as a result of the Industry and Innovation and Urban Industrial land use concepts.
- Analyze the economic impacts of the land use alternatives in light rail station areas, including an economic development feasibility analysis of the Industry and Innovation land use concept.
- Analyze impacts of locating makerspaces and other creative uses within non-industrial neighborhoods, urban villages, and mixed-use zones.
- Analyze the economic feasibility of establishing higher standards for landscaping and multi-modal transportation to create healthier transitions within single-use industrial zones.
- Evaluate the City's Shoreline Master Program's effectiveness in maritime and industrial areas to strengthen protection of currently undeveloped shorelines and to promote strategies to improve water quality treatment and flood resiliency.

The Planning Commission has historically advocated for protection of industrial and maritime lands and the jobs that are created within those sectors. **We strongly support the proposal to strengthen protections for industrially zoned lands within Seattle by establishing higher thresholds to remove industrial land designations and closing loopholes that have allowed significant non-industrial development within industrially zoned lands.** We applaud the proposed requirement that requests to remove land from a M/IC be made as part of a Major Update to the Comprehensive Plan or as a result of a detailed study. **We also strongly commend the long-awaited solution to close loopholes that have allowed significant non-industrial development within industrially zoned lands.**

The DEIS states that land use impacts are identified in the categories of consistency with plans and policies, incompatible land uses, employment mix, and inadequate transitions from industrial to nonindustrial areas. The Planning Commission agrees with the assessment that inconsistencies with existing plans and policies include stand-alone retail and offices under the No Action Alternative and housing in industrial areas in alternatives 3 and 4. We provide substantial comments on residential uses in industrial areas in the Housing section below.

We recommend that the DEIS identify how much total industrial space is needed for the City to reach its growth projections as identified in the Puget Sound Regional Council's Vision 2050 and King County's Countywide Planning Policies. The EIS should clearly document economic impacts such as demand for industrial property, square footage rents, and projected vacancy rates. The Planning Commission suggests seeking input from industrial stakeholders for this analysis, rather than rely on data generated by City staff or its consultants. **We request that the EIS specifically identify which of the sub-areas studied will likely receive job growth and require additional investment and how this may create or exacerbate economic segregation impacts.** **We recommend that the land use and economic analysis in the EIS identify the impacts of protecting industrial and maritime lands, reference potential displacement pressures, and**

9-4 cont.

identify the benefits of anti-displacement measures and incentives. We also suggest analyzing the regional economic impact of combining land usable for manufacturing jobs with other uses as a result of the Industry and Innovation and Urban Industrial land use concepts. While we understand that economic analysis may be beyond the scope of the EIS, we strongly encourage this analysis to fully understand the implications of these land use concepts, to compare the Action Alternatives, and to inform the final policy decisions.

The Planning Commission has consistently encouraged a comprehensive approach in determining a mix of uses in the walksheds around future light rail stations in industrial areas that optimizes the light rail investments without diminishing the functionality and viability of existing industrial and maritime lands. **We recommend the EIS analyze the economic impacts of the various land use alternatives in these station areas, including an economic development feasibility analysis of the Industry and Innovation land use concept.** The DEIS states that Action Alternatives that introduce the Industry and Innovation and Urban Industrial zones in larger areas could create incompatibilities between new activity and adjacent areas of continued industrial uses. The analysis concludes that these transition impacts are most likely for the Ballard and Interbay Dravus subareas. **We support establishment of the Urban Industrial zone, including higher standards for landscaping and multi-modal transportation to create healthier transitions, but also recommend analyzing impacts of locating makerspaces and other creative uses within non-industrial neighborhoods, urban villages, and mixed-use zones. We further recommend analyzing the economic feasibility of establishing higher standards for landscaping and multi-modal transportation to create healthier transitions within single-use industrial zones.**

9-4

The Planning Commission encourages a concurrent evaluation of the City's Shoreline Master Program (SMP)'s effectiveness in maritime and industrial areas to strengthen protection of currently undeveloped shorelines and to promote strategies to improve water quality treatment and flood resiliency. If the Shoreline Master Program policies can be modified outside of the typical eight-year review cycle process, the Planning Commission would suggest the following:

9-5

On page 3-250, in policies SA P37 and SA P39, consider building in a requirement for climate resiliency and consider removing the allowance of expansion of existing water-dependent facilities unless such expansion will provide ecological benefits (such as floodplain mitigation or removal of impervious surfaces). Similarly, related to the MIC Subarea plans (page 3-251), we would recommend that the goals and policies codify language around BIPOC and gender-inclusive job training programs and access to opportunity for both the BINMIC and Greater Duwamish M/IC. If these policies and plans cannot be updated out of the typical cycle, the Planning Commission encourages the evaluation and inclusion of these suggestions as potential mitigation strategies, with the intent of aligning the SMP and the M/IC Subarea plans during their next respective updates.

9-6

Housing

- The Planning Commission has significant concerns with the broad impacts on housing citywide and throughout the region resulting from increased employment growth under the Action Alternatives.
- We are concerned that the proposed mitigation measures may not be sufficient to address the housing needs associated with the significant job growth.

Additional Analysis Needed:

- Include a jobs/housing analysis to identify the capacity of areas adjacent to the M/ICs that allow housing to accommodate the projected number of jobs under each alternative.
- Identify the current and future housing capacity outside Seattle that will be accessible via light rail. Consult Sound Transit's West Seattle and Ballard Link Extensions DEIS for projected ridership metrics.
- Analyze the impacts of residential uses in industrial areas through an environmental justice and public health lens and adjust the mitigation measures as necessary.
- Analyze and document the trade-offs associated with allowing industry-supportive residential uses.

Requested Mitigations:

- Propose appropriate mitigation measures for the many skilled workers that may need to commute long distances to new jobs, including access to affordable housing both within Seattle and in communities outside it that will be accessible via light rail.
- Evaluate tools such as impact fees to generate additional affordable housing options within Seattle.

9-7

The Planning Commission has significant concerns with the broad impacts on housing citywide and throughout the region resulting from increased employment growth under the Action Alternatives. The DEIS states that small changes to housing patterns will occur that are unavoidable but not considered significant adverse impacts with appropriate mitigation. We suggest that this assessment underestimates the significance of the impact, even with mitigation. **We strongly support the proposed mitigation measures of applying the City's Mandatory Housing Affordability (MHA) program to development in the Industry and Innovation zone and adding capacity for housing in urban villages with fast access to parts of the study area expected to have large employment growth under the Action Alternatives. However, we are concerned that these proposed measures may not be sufficient to address the housing needs associated with the significant job growth associated with the increasingly intensive development proposed by the Action Alternatives.**

The Planning Commission recommends that the EIS include a jobs/housing analysis to identify the capacity of areas adjacent to the M/ICs that allow housing to accommodate the projected number of jobs under each alternative. This analysis should include a range of housing

types and affordability levels to accommodate a variety of workforce income categories. **We further recommend that the EIS identify the current and future housing capacity outside Seattle that will be accessible via light rail and that the EIS consult Sound Transit’s West Seattle and Ballard Link Extensions DEIS for projected ridership metrics.** Seattle and the broader region are in a housing affordability crisis. Many of the skilled workers employed as a result of the Action Alternatives may need to commute long distances to these new jobs due to the lack of affordable worker-supportive housing. **The EIS should explicitly address this and propose appropriate mitigation measures, including access to affordable housing both within Seattle and in communities outside it that will be accessible via light rail. The EIS should also evaluate tools such as impact fees to generate additional affordable housing options within Seattle.**

9-7 cont.

The Industrial and Maritime Strategy’s final recommendations include limited adjustments to existing allowances in transitional zones to support industry and arts entrepreneurship opportunities. The DEIS states that additional flexibility for industry-supportive housing in Alternatives 3 and 4 could result in an estimated 610 - 2, 195 new homes in industrial zones. The Planning Commission has consistently expressed its significant concerns around allowing residential uses in industrial areas, including the potential for increased development pressure and encroachment into the industrial zones. In addition, we have ongoing concerns related to the environmental health impacts of residential uses in proximity to air quality and noise emissions. **We recommend the EIS analyze the impacts of residential uses in industrial areas through an environmental justice and public health lens and adjust the mitigation measures as necessary.** This analysis should cross-reference impacts identified in the Air Quality, Contamination, Noise, Transportation, Open Space and Recreation, and Public Services elements of the EIS. **We also request that the EIS analyze and document the trade-offs associated with allowing industry-supportive residential uses, including impacts on available industrial lands and any negative impacts to manufacturing and industrial uses against the potential benefits of providing additional housing and leveraging transit investments.**

Transportation

Additional Analysis Needed:

- Clearly identify how future light rail stations will interact with the surrounding and/or adjacent industrial and maritime lands. Analyze the potentially competing demands of protecting industrial lands and robust ridership at all station locations. Reference estimates of job growth resulting from the zoning changes around each of the stations in industrial areas as well as ridership projections in Sound Transit’s West Seattle and Ballard Link Extensions DEIS.
- Conduct an equity analysis to identify impacts resulting from conflicts between freight traffic and other modes in communities without sufficient non-motorized infrastructure.
- Conduct an inventory and gap analysis of walking and biking facilities in industrial areas, especially around future light rail stations.

9-8

- Identify what types of transportation capital projects are required to keep pace with the change in jobs resulting from the Action Alternatives.

Requested Mitigations:

- Identify specific mitigation measures for impacts to freight mobility and logistics.
- Identify appropriate additional mitigation measures for impacts resulting from conflicts between freight traffic and other modes in communities without sufficient non-motorized infrastructure.
- Consider mobility hierarchy through an equity lens when assessing mitigation measures.

9-8 cont.

Of the fourteen planned stations along Sound Transit's planned West Seattle and Ballard Link Extensions, six are either within industrial zones or capture a significant amount of industrial zoned land within their walksheds. **The Planning Commission strongly recommends clearly identifying how future light rail stations will interact with the surrounding and/ or adjacent industrial and maritime lands. We request an analysis of the potentially competing demands of protecting industrial lands and robust ridership at all station locations.** This includes identification of land use and transportation impacts around light rail stations under each of the Action Alternatives. **This analysis should reference estimates of job growth resulting from the zoning changes around each of the stations in industrial areas as well as ridership projections in Sound Transit's West Seattle and Ballard Link Extensions DEIS.**

9-9

Freight mobility and access for workers are issues of critical importance for successful economic development. Greater employment and housing resulting from implementation of the Industrial and Maritime Strategy will create increased travel demand. The DEIS states that traffic volumes and travel times would increase due to growth within the study area and other parts of the city under all the Action Alternatives. Due to greater levels of growth, alternatives 3 and 4 would result in significant impacts to auto and freight on three important corridors. **The Planning Commission requests identification of specific mitigation measures for impacts to freight mobility and logistics under the Action Alternatives.**

9-10

As a result of more intensive development, more people would be walking, biking, and riding transit in parts of the study area with incomplete networks, resulting in some impacts to those modes. The DEIS states that since all pedestrian and bicycle network gaps are not likely to be addressed in areas where more vulnerable users would be walking or biking, there would be significant unavoidable adverse impact to active transportation and safety. **The Planning Commission recommends conducting an equity analysis to identify impacts resulting from conflicts between freight traffic and other modes such as pedestrians and bikes in communities without sufficient non-motorized infrastructure and identify appropriate additional mitigation measures for those impacts. We also recommend considering mobility hierarchy through an equity lens when assessing mitigation measures.** For example, if freight is prioritized, the EIS should consider how mitigation can improve the efficiency and equity of other modes.

9-11

It is important that the City continue to make investments in and enhancements to quality multi-modal access, connections, and infrastructure including sidewalks, transit access, bike lanes, and trails that get workers to their jobs. Future employment centers that are accessible by hundreds of workers will require key multi-modal improvements at critical network pinch points and gaps, such as the Ballard Bridge, 15th Avenue W. and W. Dravus Street in Interbay, and the Elliott Bay Trail. These improvements should specifically address the existing disparity between the BINMIC and the Greater Duwamish M/IC. The Duwamish Valley has a significantly higher number of network gaps and is already shouldering disproportionate transportation impacts due to historic disinvestment and the current West Seattle Bridge closure. **The Planning Commission recommends an inventory and gap analysis of walking and biking facilities in industrial areas, including investments in sidewalks, bikeshare, and last mile connections, especially around future light rail stations. This analysis should identify what types of transportation capital projects are required to keep pace with the change in jobs resulting from the Action Alternatives.**

9-12

Biological Resources and Resiliency

Additional Analysis Needed:

- Clearly identify risks of all construction in liquefaction zones, including not only buildings but also water, wastewater, and transportation infrastructure.
- Analyze detailed air quality impacts on residential areas near industrial zones such as South Park and Georgetown. Analyze potential air quality and public health impacts of co-locating offices and other non-industrial uses above industrial spaces in the Industry and Innovation land use concept.
- Analyze and document future projections of rainfall and stormwater flows. Evaluate the extent of existing stormwater and water quality impacts in industrial and maritime areas and whether the Action Alternatives can provide significant beneficial impacts. Identify opportunities for increasing innovative green infrastructure in industrial zones. Identify specific areas at risk for sea level rise and evaluate the impacts of adding density to these areas under each of the Action Alternatives.
- Identify the ecosystem benefits of adding green infrastructure and increasing trees and green landscaping in and near the M/ICs.

9-13

Soils/Geology

Seattle's industrial and maritime areas are subject to geologic hazards including seismic activity and liquefaction. The DEIS states that the Action Alternatives would generally have long-term benefits by requiring development to comply with modern development codes. The analysis concludes that Action Alternatives with more investment in new development (alternatives 3 and 4) would upgrade more structures over time. **The EIS should clearly identify risks of all construction in liquefaction zones, not only buildings but also water, wastewater, and transportation infrastructure.**

9-14

Air Quality & Greenhouse Gases

The DEIS evaluates air quality impacts of the Action Alternatives on potential sensitive populations in and near the industrial and maritime areas of Seattle. The analysis concludes that pollutants would decrease under all alternatives due to permit requirements and improvements in emissions controls. The DEIS also states that the Action Alternatives with greater growth in the study area would have slightly higher greenhouse gases than No Action. The Planning Commission is concerned with the cumulative impacts of all types of air pollution and greenhouse gases. We support the proposed mitigation measures to separate residential and other sensitive uses from freeways, railways, and port facilities, and include enhanced air filtering and circulation in any new housing in industrial areas. However, we have strong concerns about historic and ongoing air quality impacts on workers and residents that must spend time in these areas. These impacts may be unavoidable and raise significant public health and environmental justice issues that deserve more attention. **The Planning Commission requests a more detailed analysis of air quality impacts on residential areas near industrial zones such as South Park and Georgetown. We also recommend analyzing the potential air quality and public health impacts of co-locating offices and other non-industrial uses above industrial spaces in the Industry and Innovation land use concept.**

9-15

Water Resources

The DEIS states that higher levels of redevelopment under all alternatives would result in more stormwater management and water quality treatment compared to existing conditions. The analysis concludes that if mitigation measures are implemented there would be no significant unavoidable adverse impacts to water resources and redevelopment would improve stormwater management relative to existing conditions. **The Planning Commission recommends the EIS analyze and document future projections of rainfall and stormwater flows.** Climate change will result in heavier precipitation that needs to be accounted for. This is especially important because of the potential for compounding impacts on existing drainage issues in industrial areas. **We also recommend assessing not only future impacts relative to existing impacts, but also evaluating the extent of existing stormwater and water quality impacts in industrial and maritime areas and whether the Action Alternatives can provide significant beneficial impacts.** Identifying this is key to developing positive resiliency, not maintaining feedback loops that perpetuate harm. For example, Section 3-92 discusses how redevelopment is not anticipated to significantly increase impervious surfaces, flow rates, or water quality. This analysis should be reframed to identify how the alternatives have the potential to remove impervious surfaces, decrease flow rates, or improve water quality. **The Planning Commission recommends the EIS identify opportunities for increasing innovative green infrastructure in the industrial zones to protect water quality, support the health of our waterways, and serve as a climate mitigation strategy.**

9-16

The DEIS states that all alternatives may increase vulnerability to sea level rise in areas adjacent to tidally influenced water bodies. The Planning Commission recognizes the severity of the potential impacts of sea level rise on key industrial and maritime areas and is concerned that the proposed

9-17

mitigation to implement adaptation strategies from the City’s 2017 Preparing for Climate Change report may be insufficient to address this impact. **The EIS should identify specific areas of SODO, South Park, Ballard, and Interbay at risk for sea level rise and evaluate the impacts of adding density to these areas under each of the Action Alternatives.**

9-17 cont.

Plants & Animals

The DEIS states that minor amounts of landscaped or unpaved areas may be converted to developed areas under all alternatives. The Planning Commission supports the proposed mitigation measure to incorporate green spaces in new development in the Industry and Innovation and Urban Industrial zones. **The EIS should identify the ecosystem benefits of adding green infrastructure and increasing trees and green landscaping in and near the M/ICs.**

9-18

Environmental Health and Compatibility

- The Planning Commission strongly suggests directly soliciting feedback from potentially affected tribes beyond “distribution” of the DEIS. The tribes should be consulted to identify areas of cultural significance, industrial uses that could create physical or economic impacts to tribal fisheries, natural or cultural resources, and help develop appropriate mitigation strategies. We recommend explicit recognition of and attention to impacts to the cultural and historic importance of indigenous land, including the ancestral lands of the Duwamish Tribe and other tribes.
- The Planning Commission recommends increasing and/or improving parks and open space in and near the M/ICs, especially in the Duwamish Valley, where appropriate in an industrial context.

9-19

Additional Analysis Needed:

- Identify any potential contamination impacts on future residential uses in or near industrial areas.
- Analyze the need for parks and open space and public services resulting from future residential uses within industrial areas.
- Assess public services impacts and mitigation for organizations other than emergency services.

Requested Mitigations:

- Restore lands and shorelines with industrial contamination, including contaminants in fish from waterways adjacent to industrial areas.

Contamination

The DEIS states that the risk of releasing contaminants from construction activities is significant under all alternatives, but avoidable with mitigation. **The Planning Commission recommends that the EIS identify and analyze any potential contamination impacts on future residential uses in or near industrial areas.** We are also concerned that existing residential areas near industrial

9-20

zones such as South Park and Georgetown have ongoing pollution issues that should be addressed by this strategy. **The Planning Commission recommends restoration of lands and shorelines with industrial contamination as a mitigation measure to reduce public health concerns, including contaminants in fish from waterways adjacent to industrial areas.** Another potential mitigation measure would be to develop a strategy and form partnerships to address the greater number of contaminated sites present in the Greater Duwamish M/IC as compared with the BNMIC. An innovative redistribution program could be established to collect funds from development activities in the BNMIC and apply those to cleaning up contaminated sites in the Greater Duwamish M/IC.

9-20 cont.

Noise

The DEIS states that traffic volumes on roads, including truck traffic, are expected to continue to be a primary source of noise in and near the study area and are expected to increase due to increased development and population under the Action Alternatives. Significant noise impacts are also generated by freight train routes through the industrial area of Interbay. The Planning Commission has concerns related to existing and ongoing noise pollution impacts in residential areas near industrial zones such as South Park and Georgetown, as well as future noise impacts on residential development in or near industrial areas. **We support the proposed mitigation measure to limit proximity of new residential development to known or anticipated sources of high noise levels.**

9-21

Historic, Archaeological, & Cultural Resources

The DEIS states that there is potential for alteration, damage, or destruction of historic, archaeological, and cultural resources under all alternatives. One of the mitigation measures listed is to develop histories of the study area centering indigenous perspectives. However, the Planning Commission is concerned that the list of data sources in Section 1.7.11 (page 1-62) does not include tribal consultation. **We strongly suggest directly solicitating feedback from potentially affected tribes beyond “distribution” of the DEIS. The tribes should be consulted to identify areas of cultural significance, industrial uses that could create physical or economic impacts to tribal fisheries, natural or cultural resources, and help develop appropriate mitigation strategies.** We suggest codifying consultation with the Duwamish Tribe to redress historic exclusion, despite the tribe not yet being federally recognized. Within the body of the DEIS, the Duwamish Tribe is listed under Community Organizations instead of with Tribes. This could be modified with an asterisk if necessary. Also, in Section 1.3.2 (page 1-6), we recommend listing specific indigenous tribes as well as acknowledging other settlement in addition to Euro-American settlement. **More broadly, the Planning Commission recommends explicit recognition of and attention to impacts to the cultural and historic importance of indigenous land, including the ancestral lands of the Duwamish, Suquamish, Stillaguamish, and Muckleshoot Tribes.**

9-22

Open Space & Recreation

The DEIS states that the Action Alternatives would create increased demand on existing parks and demand for new park land due to increased employment in the study area. **The Planning Commission recommends increasing and/or improving parks and open space in and near the M/ICs, especially in the Duwamish Valley, where appropriate in an industrial context. We also request analysis and documentation of impacts related to the need for parks and open space resulting from future residential uses within industrial areas.**

9-23

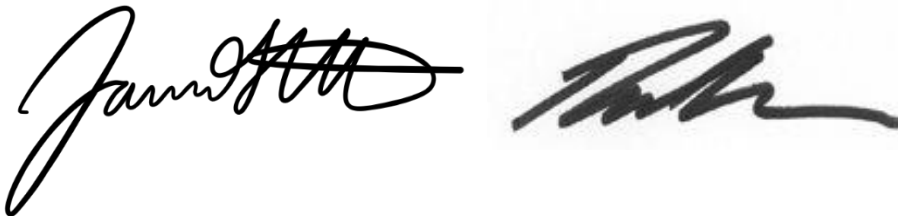
Public Services

The DEIS states that growth in worker and residential populations could increase the number of calls for emergency services or workload for police services, and increased traffic volumes could increase response time for some emergency vehicles. **The Planning Commission recommends analyzing the impacts and need for public services specifically related to future residential uses within industrial areas. We also request an assessment of the impacts and mitigation measures for organizations other than emergency services.** Specifically, we would like to see discussion of community centers and access to support services beyond the police and fire departments. We are concerned that naming the Seattle Fire Department and Seattle Police Department specifically in Section 1.7.13 could have funding ramifications, as there are other community organizations that could provide emergency and support services, especially for issues like homelessness.

9-24

We appreciate the opportunity to provide our comments on the DEIS. If you have any questions, please do not hesitate to contact Vanessa Murdock, Seattle Planning Commission Executive Director.

Sincerely,

The image shows two handwritten signatures in black ink. The signature on the left is larger and more stylized, while the one on the right is smaller and more compact.

Rick Mohler and Jamie Stroble
Co-Chairs, Seattle Planning Commission

Cc: Mayor Bruce Harrell
Seattle City Councilmembers
Rico Quirindongo, Office of Planning and Community Development

Holmes, Jim

From: Morris, Dena S <dsmorris@seattleschools.org>
Sent: Wednesday, March 02, 2022 2:51 PM
To: PCD_Industry_And_Maritime_Strategy
Cc: Holmes, Jim; Narver, Gregory C
Subject: SPS Comment Letter on DEIS for Seattle I&M Strategy (on behalf of Rob Gannon)
Attachments: SPS Comment Letter Industrial Lands (2-24-22) - final.pdf

CAUTION: External Email

Dear Mr. Holmes,

Please find Seattle Public Schools' comments on the Draft Environmental Impact Statement ("DEIS") for the Seattle Industrial & Maritime Strategy proposed by the Office of Planning & Community Development ("OPCD").

We look forward to continued engagement with OPCD staff and the City on the Industrial & Maritime Strategy. Thank you for your consideration of these comments.



Rob Gannon
Deputy Superintendent
rwgannon@seattleschools.org
206-252-0180

February 28, 2022



VIA ELECTRONIC MAIL

Mr. Jim Holmes
City of Seattle
Office of Planning & Community Development
P.O. Box 94788
Seattle, WA, 98124-7088
pcd_industry_and_maritime@seattle.gov

Re: Seattle Industrial & Maritime Strategy
Seattle Public Schools' Comments on Draft Environmental Impact Statement

Dear Mr. Holmes:

Seattle Public Schools (“SPS”) appreciates the opportunity to review and provide comment on the Draft Environmental Impact Statement (“DEIS”) for the Seattle Industrial & Maritime Strategy proposed by the Office of Planning & Community Development (“OPCD”). SPS owns and operates the John Stanford Center for Educational Excellence (“Stanford Center”) located at 2445 3rd Avenue South in the SoDo neighborhood of Seattle (King County Parcel No. 766620-5235). The Stanford Center serves as the headquarters and the seat of government for Seattle Public Schools. The Stanford Center hosts School Board meetings, other public meetings, and serves as the SPS enrollment hub. In addition, the Stanford Center provides areas dedicated to, *inter alia*, warehousing (for its mailroom, plumbing and piping, shipping and receiving), food processing, lecturing, light industrial (for its data center, electrical shop, computer repair, and archives), publishing, training, and office functions. The Property is currently zoned Industrial General 1 with an 85 ft. or unlimited height limit (“IG 1 U/85”) and was issued a special exception under the Seattle Municipal Code (“SMC”) for the headquarters.

The DEIS studied four alternatives illustrating different potential futures for industrially-zoned lands in Seattle: Alt. 1 - No Action, Alt. 2 - Future of Industry Limited, Alt. 3 - Future of Industry Targeted, Alt. 4 - Future of Industry Expanded. The DEIS proposes two industrial zones for the Stanford Center depending on what action alternative is ultimately selected:

- Alt. 2 - Future of Industry Limited; **Designation: Maritime, Manufacturing & Logistics (“MML”)**
- Alt. 3 - Future of Industry Targeted; **Designation: Industry & Innovation (“II”)**
- Alt. 4 - Future of Industry Expanded; **Designation: II for the Stanford Center parcel and MML for the parking lot parcel**

10-1

Based on the prescribed development standards, a designation of *MML will render SPS's use of the Stanford Center as legally nonconforming*. While it is possible the existing Stanford Center could be considered conforming or allowed under the II development standards, there remains some risk that the Stanford Center could be considered nonconforming under Alternatives 3 and 4 and would certainly limit development flexibility in the future. For example, SPS currently uses a portion of the Stanford Center parking lot parcel for school bus parking and would need this use to continue under a MML or II designation.

10-1
cont.

Overall, the alternatives considered could better address existing conditions. The restrictive requirements of the MML zone and the specific requirements in the II zone will not encourage industrial development—or any development—and ultimately result in maintaining the status quo while creating a number of nonconforming buildings. Currently surrounding the Stanford Center is a series of underdeveloped retail and fast-food restaurants and very limited industrial uses. By limiting both office and retail in uses both the MML and II zones, the alternatives considered would cement these less than desirable conditions. SPS asks that OPCD study additional alternatives that (1) recognize existing conditions and development constraints and (2) encourage both industrial and office development in a more flexible manner.

10-2

In addition to these overarching comments, SPS highlights the following concerns related to the DEIS analysis for Alternatives 2-4 (collectively, the “Action Alternatives”). With respect to the Action Alternatives, the DEIS greatly understates the environmental and community impacts of these alternatives. The Action Alternatives will preclude development that exceeds its strict limitations on storage, offices, sales and services, restaurants. Thus, the Industrial and Maritime Strategy will prevent the redevelopment of properties unsuited to the uses allowed by the Action Alternatives. This will reduce employment opportunities and the products and services available to communities in and near industrial areas. Existing buildings that are unsuited to the industrial uses allowed by the Industrial and Maritime Strategy due to their size, location or layout, or other factors, will not be able to be reused and will sit vacant and fall into disrepair. *Most importantly, the Action Alternatives will render many developments nonconforming, including the Stanford Center, which will discourage future capital investment in them.*

10-3

Due to these effects, we ask OPCD to further explore the Action Alternatives and their significant adverse impacts to aesthetics and blight, environmental health, and transportation as follows:

1. Aesthetics and Blight

- SPS is concerned that the Action Alternatives, especially Alternative 2, could preclude development or redevelopment of properties leading them to sit vacant and unused, and

10-4

causing them to deteriorate and become blighted, thus resulting in significant adverse aesthetic and blight impacts.

- The DEIS acknowledges that OPCD received comments stating that if “certain land uses are not permitted under an alternative (i.e., unlimited housing) landowners would be less likely to invest in improvements and development, which would lead to economic blight.” DEIS at 3-273. In response, OPCD stated that SEPA does not require cost-benefit or economic analysis. DEIS Appendix A, 5-7. This is an abrupt dismissal of fears raised by concerned property owners. SPS is concerned that the implementation of the Action Alternatives in the DEIS will render its use of the Stanford Center as legally nonconforming and greatly limit future redevelopment opportunities in the area surrounding the Stanford Center. We encourage OPCD to consider the potential detrimental effects of the Action Alternatives that will maintain the status quo, particularly in SoDo.

10-4
cont.

2. Environmental Health

- The DEIS identifies that development under any of the Action Alternatives “may encounter hazardous materials such as contaminated soil, groundwater, surface water, or sediments. The greatest potential for impacts associated with contamination would occur during construction when sites are disturbed.” See DEIS at 1-42, 3-142. However, this assessment does not acknowledge that *environmental cleanup will not occur* if redevelopment is rendered infeasible due to the proposed zoning designations under the Action Alternatives. Therefore, the environmental cleanup that would occur with redevelopment will not happen under the Action Alternatives, causing significant adverse impacts to environmental health.

10-5

3. Transportation

- The DEIS states that the Action Alternatives would likely result in improved infrastructure in the areas zoned as II because they would be subject to development standards for pedestrian and cyclist-oriented frontage improvements. DEIS at 3-385. This analysis warrants further exploration. Uses prohibited or made difficult by the Action Alternatives will be sited further from the people that use them, thus increasing the volume and length of vehicle trips and causing significant adverse transportation impacts.
- The Stanford Center is within 0.25 mile of the SoDo LINK light rail station. The proposed alternatives would not take advantage of the light rail proximity and would instead encourage heavy car usage. A new alternative should consider additional density that also prioritizes light rail usage, especially with the addition of a new LINK light rail station associated with the Sound Transit 3 (“ST3”) West Seattle extension. However, by cementing the status quo of the SoDo neighborhood, the Action Alternatives discourage light rail usage. The DEIS is deficient because it does not analyze these impacts.
- There appears to be a disconnect between the goals of light rail and the proposed legislation studied in the Industrial & Maritime Strategy DEIS. SPS encourages OPCD to work with Sound Transit to ensure that FEIS is aligned with ST3 Plan and goals for station area development, including the recently released DEIS for ST3.

10-6

As written, the Action Alternatives will lead to an entrenched status quo in the SoDo neighborhood, including on-going public safety concerns for members of the public who travel to the Stanford Center for SPS services or meetings, when neighborhood revitalization is desperately needed. We urge OPCD to modify or remove the Action Alternatives and add new alternatives in the Final EIS that provide additional flexibility in the creation and maintenance of nonindustrial uses. If these alternatives are to be carried forward, OPCD should invest considerable resources to study their actual impacts and associated costs, which will be significantly higher than the DEIS estimates. Seattle Public Schools remains deeply concerned that implementation of one or more of the Action Alternatives in the DEIS will render its use of the Stanford Center as legally nonconforming. We look forward to continued engagement with OPCD staff and the City on the Industrial & Maritime Strategy. Thank you for your consideration of these comments.

10-7

Sincerely,



Rob Gannon
Deputy Superintendent
Seattle Public Schools

Enclosure

Holmes, Jim

From: Persak, John
Sent: Monday, February 28, 2022 11:02 AM
To: PCD_Industry_And_Maritime_Strategy
Cc: Wentlandt, Geoffrey; Holmes, Jim
Subject: DEIS comments
Attachments: Final 2-28-22 DEIS comment for MI Strategy.pdf

Greetings,

Attached are comments on the DEIS.

Thank you,



John Persak
Manufacturing and Maritime Strategic Advisor
Seattle Office of Economic Development
O: 206-684-8839 | M: 206-437-9122 | John.Persak@seattle.gov
700 Fifth Avenue, Suite 5752, Seattle, WA 98104
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Pronouns: he/him

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Seattle Office of Economic Development

Markham McIntyre, Interim Director
Bruce Harrell, Mayor

Seattle Industrial & Maritime Strategy Draft Environmental Impact Statement comments,
Office of Economic Development, City of Seattle

February 28, 2022

Geoff Wentlandt, Planning Manager,
Office of Planning and Community Development
Geoffrey.Wentlandt@seattle.gov

Jim Holmes, Strategic Advisor,
Office of Planning and Community Development
Jim.Holmes@seattle.gov

Sent by e-mail to [PCD Industry And Maritime Strategy@seattle.gov](mailto:PCD_Industry_And_Maritime_Strategy@seattle.gov)

The Office of Economic Development (OED) is submitting comment on the Seattle Industrial & Maritime Strategy (“Strategy”) Draft Environmental Impact Statement. As we understand, in June of 2021, [the Seattle City Council adopted recommendations from the Mayor’s office](#) on how Seattle will move forward on key industries of Manufacturing and Maritime, through changes in the city’s Comprehensive Plan. Multiple stakeholders from each of five industrial area neighborhoods (Ballard, Interbay, SoDo, Georgetown, and South Park,) BIPOC Youth Engagement Partners, City of Seattle staff, consultant partners, and at-large citywide participants representing an array of maritime and manufacturing activities, provided the experiential knowledge and feedback which led to the development of the 11 strategies.

11-1

In our comments, we intend to promote flexibility for economic growth and job opportunities in Maritime, Manufacturing, and Logistics (MM&L) under the Comprehensive Plan and other regulatory strategies, while reducing the impacts of these activities within the MICs on long established residential communities with significant and documented disparate health impacts. We want to advocate for actions which cumulatively will have the least Significant Impacts, and the lowest possible risk for Significant Unavoidable Adverse Impacts to the MM&L industry’s supporting land use activities and transportation safety, so that these jobs remain for future generations.

Our top priority is centering workforce development for BIPOC communities and women to benefit from more direct pathways into MM&L industries with livable wage starting pay, as the increasing demand for new hires creates lower barrier employment and ownership opportunities. The COVID-19 pandemic has exacerbated and accelerated the existing

11-2

“retirement cliff” of long-term employees aging out of the MM&L workforce, where the average age is over 50. Retention and expansion of “missing middle” livable wage jobs in Seattle can be achieved in Maritime, Manufacturing, and Logistics within the footprint of Seattle’s Manufacturing Industrial Centers (MICs), if we can prioritize the functionality of these spaces.

11-2 cont.

Publicizing training, retention strategies, and partnering with employers and Community Based Organizations (CBOs) who are committed to equity in MM&L is more effective when there is a built environment that supports business longevity. Leveraging these opportunities, instead of allowing attrition to decrease job capacity in these industries, may in part address inequitable employment and wealth disparity overall.

11-3

The issuing of a FEIS and adoption of Comprehensive Plan amendments should provide more policy stability for future job growth in MM&L. A final FEIS serves as a reference point for continued conversations with communities on repairing present and past disparities in health and quality of life, especially with the increased risks associated with climate change, air quality, and legacy pollution sites. Improving on previous attempts city-wide to forge a maritime and industry policy for land use, communities were well represented and engaged in the process of scoping this DEIS. The DEIS comment period was well publicized to stakeholders and the time for comment has been extended.

11-4

Future multiple opportunities for engagement will build on the results of this effort. Ongoing Stewardship Entities for the M&I Strategy Recommendations, the Comprehensive Plan amendment cycle, Duwamish Valley Resilience District Community Engagement, engagement with and participation on the Freight, Bicycle, Pedestrian, and Transit Advisory Boards, Puget Sound Regional Council subarea planning, as well as community engagement opportunities with the Port of Seattle are examples. The FEIS will be the necessary cornerstone to make progress on future planning.

11-5

Qualified support for Alternative 2

Action under Alternative 2, with some modification, may provide the most stability and growth for MM&L jobs in the new MML zone in the MIC, while providing some relief to residential communities who have experienced historical impacts from heavy industry. However, unclear mitigation strategies, insufficient data of residential and transportation modal impacts, and overreach on non-MM&L development risks producing a policy that could undermine some of the M&I Strategy goals. The net benefits of Alternative 2 in many instances surpass no-action, 3, and 4, and some of the drawbacks within Alternative 2 could be addressed with additional information and modification.

11-6

Alternative 2 Benefits:

Jobs: The emphasis on job growth for MM&L is proportionately greatest. At 60%, the risk that other types of economic activity will displace MM&L is lower, as the Puget Sound Regional

11-7

Council requires a 50% rate of “industrial” employment in the MIC. “Non-industrial” jobs may grow in other areas of the city, whereas MM&L jobs typically cannot. Alternatives 3 and 4 have the most risk of MM&L jobs in the MIC falling below 50%, and the most risk of job growth overall running up against constraints imposed by real-world limitations of mitigation. Alternative 2 industrial job growth is substantially higher than no action. (DEIS 1-30).

11-8

Transportation: Based on the data presented, the overall Significant transportation impacts for Alternative 2 are lowest, but still present. (See table, DEIS, 1-58).

Traffic impacts to Interstate 5 are noted as Significant Unavoidable Adverse Impacts under Alternatives 3 and 4 (DEIS 3-426), but not under Alternative 2. These impacts may be felt by communities, as Georgetown is adjacent to I-5, and South Park is within the “traffic shed” (see DEIS 3-351) of street and highway networks (SR599, SR99, SR509) which act as alternate routes. However, SR509 through South Park, and SR599 which feeds SR99 from the south through South Park, are not included in the traffic shed for this DEIS. The 1st Ave Bridge, a Major Truck Street which connects East Marginal Way, 1st Ave S., and S Michigan St. in Georgetown, to the southwest MLK County highway network and SeaTac Airport, is not included in the study. The impacts are probable under Alternatives 3 and 4, but the extent is unknowable without additional study.

11-9

Land Use Capacity: Alternative 2 represents the highest land use capacity for MM&L (90%), while addressing some past limitations for mitigating impact on neighborhoods such as Georgetown and South Park. Alternative 2 supports future Transit Oriented Development (TOD) along the West Seattle/Ballard Link Extensions for Sound Transit, including employment centered TOD in SoDo.

11-10

Realistic Costs vs Risk of Unfulfilled Mitigation: Alternative 2 recognizes the need for land use evolution around the boundaries near certain neighborhoods, while lessening impacts which would otherwise occur under no action. Alternatives 3 and 4 would incur substantial more costs to mitigate traffic congestion and safety, presenting a higher risk that mitigation does not actually occur in the long run due to financial constraints.

11-11

Future Conflict over Industrial Use: Alternative 2 represents less future risk of protracted community conflicts over land use and supportive appropriate transportation modes for the MIC. Alternatives 3 and 4 represent higher risks for conflicts, particularly in SoDo around the sports stadiums, the Ballard industrial waterfront, and Airport Way S./Corson in Georgetown. Such conflicts are a drain on resources for communities, employers, and public agencies, and discourage long term investments and viability of MM&L businesses.

11-12

These conflicts currently center around bicycle and pedestrian infrastructure on Major Truck Streets next to truck ingress/egress, mixed use development which displaces MM&L businesses when the impacts are not mitigated, and encroachment of MM&L into established residential

neighborhoods. The number of issues may increase, and/or current disputes may become more protracted under no action, and Alternatives 3 and 4.

Overall, Alternative 2 would have the least Significant Unavoidable Adverse Impacts in terms of incompatible land uses (DEIS 3-313). This should not be taken to mean that existing conflicts would be eliminated, particularly in the Ballard neighborhood, where buffer zones have been eliminated in many instances.

11-12 cont.

Alternative 2 Concerns:

Open Space for impacted neighborhoods: Unfortunately, there is no significant increase in LOS for open space under Alternative 2 for disadvantaged communities (DEIS 1-66). A modification which would support the open space concepts adjacent/near the Duwamish Waterway in South Park described in Alternatives 3 and 4 could be explored as a modification, provided the risks to the M&I Strategy are accounted for and considered with ample data.

11-13

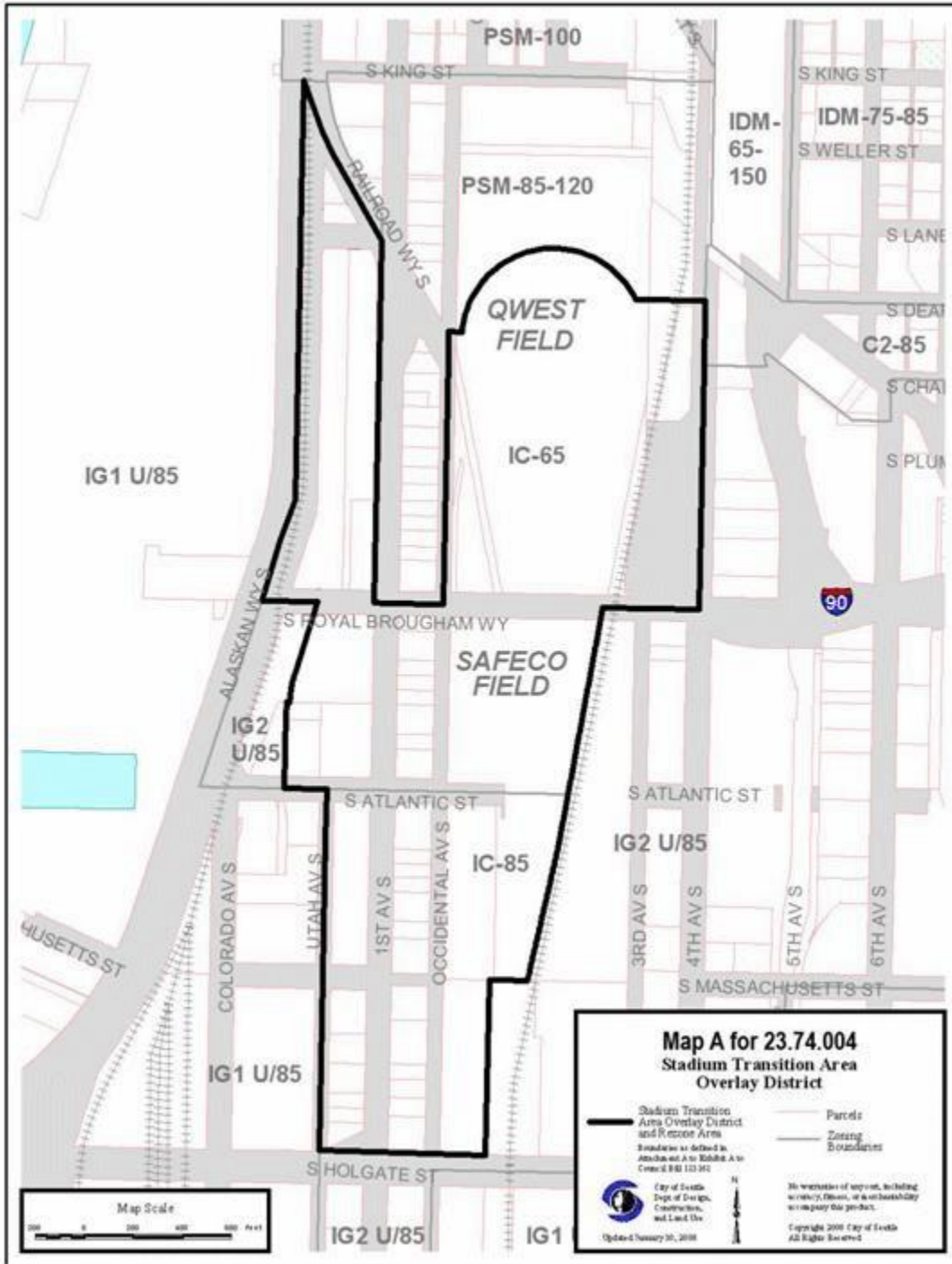
There is no net increase in open space for the Georgetown neighborhood under any of the actions proposed. Realistic and achievable open space concepts, within the new UI zones in Georgetown, should be explored and considered as a component of Alternative 2.

Stadium Transition Area Overlay District (SoDo):

In Alternative 2, there is no stated significant residential housing expansions in the Urban Industrial (UI) zones, whereas there is expansion in Alternatives 3 and 4. In all three action Alternatives, UI zones are proposed in neighborhoods such as Ballard, Interbay (Smith Cove, Dravus), South Park, Georgetown, and in Sodo within the boundaries of the Stadium Transition Area Overlay District (“Overlay” or “STAOD”). The UI zone in each action alternative represent a one size fits all approach, despite the substantial differences in the needs and challenges of these areas.

11-14

The Overlay in SoDo is located roughly south of S Royal Brougham Way and north of S. Atlantic St./east of 1st Ave S, with Holgate as the southern edge, and Alaska/Utah as the western edge:



The ordinance for the current zoning of this Stadium area states:

“The Stadium Transition Area centers on large sports facilities and allows uses complementary to them. It is intended to contribute to a safer pedestrian environment for those attending events and permits a mix of uses, supporting the pedestrian-oriented character of the area as

well as the surrounding industrial zone, while minimizing conflicts with industrial uses. Within the overlay district, use provisions and development standards are designed to create a pedestrian connection with downtown; discourage encroachment on nearby industrial uses to the south; and create a pedestrian-friendly streetscape. Allowing a mix of uses, including office development, is intended to encourage redevelopment and to maintain the health and vibrancy of the area during times when the sports facilities are not in operation.” (see SMC, Chapter 23.74 - STADIUM TRANSITION AREA OVERLAY DISTRICT)

The flexibility in the current Overlay provides ample opportunity for further in-fill development; the industrial land uses in the Overlay south and west of T-Mobile are largely unchanged since it was built, except for the 1st Ave S. facing block south of S. Atlantic and east of S. Utah, the removal of the WOSCA facility, land which is now vacant, and the SR99 tunnel connections. Urban village infill has mostly occurred north and east of both stadiums.

The “buffering” potential of the Overlay has not been fully utilized, and the transportation mitigation required by the street vacation in 1999 for what is now T-Mobile Field was never completed (e.g. Holgate improvements, see Seattle Clerk File, Ordinance #119534 for an exhaustive list of required mitigation.) UI seems to change the mandated priorities and strategies within the current Overlay under all Alternatives to additional allowances for non-MM&L commercial activity, effectively eliminating all incentives for retaining uses for MM&L and reducing the effectiveness of the intent of the Overlay:

11-15

“[UI:] Amend STAOD so lodging is a permitted use, and no design review is required. Increased maximum size of use limits: Office: 75,000; Restaurants/bars: No Limit; Lodging: 75,000; General retail sales: 20,000; Maximum size of use limits do not apply if 0.4 FAR or more industrial space is provided on site.” (DEIS 2-25)

Moving ahead in the Overlay on UI as presented may induce demand for additional mixed-use south of the Overlay beyond what is already allowed, as it would functionally extend the Pioneer Square Urban Village south to S. Holgate, past the actual boundary at S. Atlantic. Driving demand for future use and zoning encroachments and further rezone in the new MM&L zone is foreseeable. In this situation, the zoning may incentivize policy to extend the urban village boundary to backfill with residential, undermining the purpose of the Overlay buffer. Re-institutionalizing pressure to further convert the MIC lands away in SoDo would conflict with the stated goals of the M&I Strategy.

The DEIS notes that reducing employment in the non-MM&L sectors may mitigate the impacts on Interstate 5. This is pertinent because the Overlay is at a major access point for I-5 and I-90 via SR519:

“Regarding land use mix and trips, under alternatives 3 and 4, the City could consider the balance of employment uses and plan for greater industrial jobs, and a smaller share of non-industrial jobs (e.g., retail, services, office) in the Greater Duwamish MIC to reduce trips. The City could consider a preferred alternative that has less of the employment dense Industry and

Innovation zone than is found in alternatives 3 and 4 but more than Alternative 2 but that still avoids significant adverse impacts on I-5.” (DEIS I-61)

If the emphasis on rebalancing non MM&L employment is centered in the Overlay in the UI zone, there is potential that impacts to I-5 could be reduced to account for non MM&L employment growth in other areas near the MIC, including the II zone.

Adding UI in the portion of the Overlay south of Atlantic St. could be explored and considered as a component of Alternative 2, *provided that a revised and strengthened Overlay concept be proposed by amending the current Overlay language in the Comprehensive Plan, to address contemporary transportation issues and close loopholes, to further enhance the Overlay as the spatial and temporal buffer between the stadiums and the MML zone.* This would mean moving away from the generous allowances currently proposed as amendments to the Overlay, to achieve a rebalancing as a buffer between the stadiums and the MML zone.

11-15 cont.

While the continued ask for expanded housing here is noted, the justifications have been transitory, and there is no data presented in the DEIS which suggests a community preference or better utility for new housing near freeways, Major Truck Streets, stadium game day traffic, and rail operations in SoDo over other parts of the city.

Mixed Use Zoning (Georgetown)

Alternatives 3 & 4 propose a rezone of the area between Corson Ave S., Airport Way S., and (presumably) S. Bailey St., which are all freight routes. There is virtually no data in the DEIS on what the impacts of removing this specific IG2 section of the MIC and placing it into a Mixed Use zone on the surrounding uses, traffic safety without and within, infrastructure upgrade costs, or the displacement of industrial businesses within the proposed mixed use zone. The change is unique enough to the DEIS that it demands a separate analysis.

11-16

However, *Alternative 2 does not recognize that this area represents a unique set of challenges, resulting from the revitalization of the arts district of Georgetown over the past 20 years in many (unreinforced) historical buildings. This renewal is directly adjacent to an active rail spur, is next to industrial businesses, and is near the BNSF main rail line. It is also a neighborhood economic driver ancillary to residential neighbors, an amenity for employees in the nearby industrial businesses, and supportive of the local arts community.*

A modification of Alternative 2 to create an overlay for this area of Georgetown, which recognizes its distinct artistic, historic, industrial, entertainment, and small business contributions, with an eye on the unique use and safety challenges could solve the “neighborhood mixed use vs. industry” dilemma. Establishing and documenting the data and mapping the existing granular conditions would be a necessary first step in creating an effective overlay.

Local supply chains, Major Truck Streets, and safety

The Manufacturing Industrial Centers can only effectively function as a space for MM&L when there are functional, efficient, *and safe-for-everyone freight routes*. MM&L relies heavily on Seattle's freight network for local supply chains and on Major Truck Streets for local, regional, and international goods movement. The freight network is utilized by and necessary for any operation, small and large, which receives deliveries from trucks, as well as distribution hubs for home delivery of goods. Safety necessarily includes all users of Seattle streets, including pedestrians and people on bicycles.

Our support for Alternative 2 is qualified in this instance, because there is not enough data or opportunities identified for mitigation when it is apparent that these safety risks will increase. The impacts from no-action, Alternatives 3 and 4 are more egregious.

For example, placing people on the street or near driveways where freight access must occur, or increasing the amount of freight traffic there when the amount of people is static or increasing, leads to increased conflicts with trucks, which is likely to occur in the new UI and II zones. This is especially true for pedestrians and people utilizing bicycles for transportation to and from places of employment and other needs. (see DEIS maps, 3-377, 3-378). In all alternatives, (DEIS 3-427) a Significant Unavoidable Adverse Impact is noted for the conflict between truck traffic and bike/pedestrian traffic, due to the number of network gaps that need to be addressed, and the lack of funding available. The DEIS acknowledges:

"...the Action Alternatives may result in an increased number of truck and vehicle conflicts with vulnerable users such as people walking and biking in industrial areas, as outlined in the 2020 Bicycle and Pedestrian Safety Analysis. Because trucks represent a higher proportion of fatal collisions than any other type of collision (as documented in the Freight Master Plan), it is reasonably likely that the Action Alternatives could result in an increased rate of serious and/or fatal collisions in the study area." (DEIS 3-388)

However, there is very little disaggregated data concerning conflicts specifically between trucks and bicycles/pedestrians in the DEIS, or in the 2020 Bicycle and Pedestrian Safety Analysis. The DEIS data is linked to geographic location and on freight routes where increased conflicts *with all vehicles* are noted. The design requirement to minimize collisions between trucks and bikes vs. regular vehicles and bikes, are significant enough to justify disaggregating the data. It would be useful to understand the risk factors of truck and bicycle/pedestrian collisions for each of the action alternatives, to understand what design elements would be necessary or possible in each case. A goal could be a universal design that would prioritize the safety and mobility of all three modes in particular circumstances.

Reallocating and prioritizing funding and projects for bike and pedestrians based on the number of users of all abilities, and prioritizing funding routes directly serving historically disadvantaged neighborhoods, especially routes where conflicts with freight network users would be minimal

but continuous, are examples of steps that could further address Significant Unavoidable Adverse Impacts.

Local supply chains, Major Truck Streets, and capacity

The increase of activity in the MML zone for Alternative 2 will mean an increase in demand vs supply ratio for truck parking, particularly trucks servicing the port marine terminals. There are existing impacts to residents and businesses by the high demand, and incidence of haphazard truck parking. Additional data on the truck parking, especially where capacity is at an equilibrium and at capacity for other vehicles needs to be considered, and realistic and achievable solutions identified.

Data on the impact of game day stadium traffic on proposed UI zones in the Overlay area for Alternative 2 would be informative to understanding impacts of increased mixed-use activity. Peak event game day traffic, especially when both stadiums are hosting an event simultaneously, with the added traffic to service the UI zone, will cumulatively affect Major Truck Streets (1st Ave. S, 4th Ave S., S Atlantic Street, and East Marginal). However, there is little information in the DEIS which discusses peak game day traffic patterns.

11-18

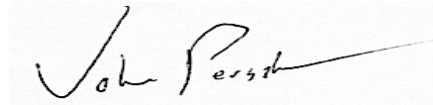
There is no analysis on the impact of the inventory or functionality of truck loading zones and other freight access points for any of the alternatives. Spaces for trucks to deliver and load goods will need to be increased citywide for location and time duration, to correspond with the amount of job growth, particularly from MML zones. Since the freight network is interdependent, it would be informative to study the demand and impacts of additional truck loading zones for all varieties of freight transport and the consequences of a shortage, and safety in relation to other modes of traffic.

Conclusion

Alternative 2, while not perfect, represents the best progress for settling major questions on the retention and growth of the MM&L industries, while we grapple with the challenges of population growth, traffic congestion, and addressing wealth disparity. In hopes of reaching a post-Covid 19 pandemic era, we have an opportunity to set the table to position Seattle as a place where Maritime, Manufacturing, and Logistics business is welcome and supported, so that we may all benefit.

11-19

Sincerely,



John Persak
Manufacturing and Maritime Strategic Advisor

Holmes, Jim

From: Josh Brower <josh@browerlawps.com>
Sent: Wednesday, March 02, 2022 4:34 PM
To: PCD_Industry_And_Maritime_Strategy
Cc: Wasserman, Eugene
Subject: Seattle Industrial & Maritime Strategy DEIS--Comment Letter
Attachments: SBS&G Industrial Lands DEIS Comment Letter.pdf

CAUTION: External Email

Mr. Holmes, please accept the attached as Salmon Bay Sand & Gravel Company's comment letter with regard to the above-referenced matter.

Best regards, Josh

Joshua Brower
Brower Law PS
1111 Third Ave, Suite 3000
Seattle, WA 98101
206.498.1804
josh@browerlawps.com
www.browerlawps.com



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2 March 2022

Via Email ([PCD Industry And Maritime Strategy@seattle.gov](mailto:PCD_Industry_And_Maritime_Strategy@seattle.gov))

Jim Holmes
Office of Planning & Community Development
P.O. Box 94788
Seattle, WA 98124-7088

Re: *Seattle Industrial & Maritime Strategy DEIS Comments
Salmon Bay Sand & Gravel Co.*

Dear Mr. Holmes:

I represent Salmon Bay Sand & Gravel Company (Salmon Bay) with regard to the above-referenced matter. Please accept this letter as Salmon Bay's comments on the City's Industrial & Maritime Strategy DEIS.

While Salmon Bay generally supports Alternatives 3 (Future of Industry Targeted) and 4 (Future of Industry Expanded), it wants to ensure Seattle does not continue trying to locate incompatible uses in industrial areas because doing so undermines existing uses; protects its current maritime and industrial base by making it harder to rezone industrial lands to non-industrial uses; and provides proper buffers and other regulatory mechanisms to ensure co-located or adjacent non-industrial uses do not further erode and undermine the ability of existing uses to continue operating.

12-1

As part of updating and adopting new, stronger industrial and maritime zoning designations, revised and updated Comprehensive Goals and Policies, and new development regulations, Seattle must stop trying to locate incompatible uses in maritime and industrial zones because doing so actively undermines existing maritime and industrial businesses and will drive those businesses out of business. The Seattle Department of Transportation's (SDOT) decade's long quest to complete the Missing Link of the Burke-Gilman Trail through the heart of the BINMIC on Shilshole Avenue is a perfect example of such an incompatible use that will drive existing businesses out of business, which is inconsistent with the City's current efforts to reform and strengthen its Comprehensive Plan Goals and Policies, its zoning designations, and Seattle's development regulations to protect and preserve existing maritime and industrial businesses in the BINMIC instead of eliminating them.

12-2

These concerns are not just conjecture and hyperbole and instead were clearly articulated and documented in the first draft of the Economic Discipline Report (EDR)¹ prepared by SDOT's consultant, ECONorthwest, for the Draft Environmental Impact Statement SDOT prepared for the

12-3

¹ Copies of relevant pages are attached.

Missing Link.² But instead of letting the first draft of the EDR see the light of day, SDOT instructed ECONorthwest to remove to delete all references to “significant impacts,” “damages,” “winners” and “losers” and all quantitative data and analysis that was included in the first draft of the EDR, and replace it with essentially meaningless information about total delay at a single intersection. For example, the first draft of the EDR clearly articulated that the Missing Link—an incompatible use—would have significant impacts on existing maritime and industrial businesses in the BINMIC, including the following:

The construction of the Burke-Gilman Trail Missing Link will result in changes to accessibility, transportation patterns and infrastructure in the Ballard region of Seattle. The resultant changes in operation of the BGT are likely to induce alterations to the economic landscape of businesses and residents of Ballard. Some economic impacts will manifest in short run disruptions in business and commuting activity due to trail construction...*The operational impacts may entail some “winners”, those whose business and residents benefit from increased accessibility and pedestrian/bike traffic, as well as “losers”, those who are detrimentally impacted by the trail from congestion of existing activity with increased pedestrian/bike traffic.* (Sect. 4.2)

And,

The operation of the BGT Missing Link may significantly impede some industrial users located adjacent to the trail due to the congestion of industrial traffic and pedestrian use. Significant impacts mean that these industrial users are likely to experience disruptions to business activity that are unlikely to be overcome or mitigated without large cost. (Sect. 4.2)

And,

At these points, the congestion of pedestrian and bike travelers with industrial traffic may cause significant economic harm. *Significant impacts result from the interference of the business operations of industrial properties due to pedestrian and bicycle traffic. This interference may result in decreased profitability and in extreme cases, result in some industrial users going out of business.* (Sect. 4.2)

And,

Table 4-3-2 shows the expected economic impact to those properties identified with significant operations adjacent to the Shilshole South Alternative. Economic impact is ranked on a 1 to 5 scale, with 5 being most affected. This subjective scale captured the degree to which current operations and accessibility are likely to be impinged by the operation of the Shilshole South Alternative for the BGT Missing Link.

² <https://www.seattle.gov/Documents/Departments/SDOT/BikeProgram/BGT/BGTDraftEISJune2016.pdf>

* * *

Of the properties identified, it is expected that the ***Ballard Marina and Salmon Bay Sand and Gravel may be significantly impacted by the operation of the Shilshole South Alternative.*** (Sect. 4.3)

And,

If capitalized into 2015 dollars using a discount rate of 3.5% and a capitalization rate of 6.0%, the capital cost of driveway delays are equivalent to a total value of approximately - \$1.4 million. Some of these costs may be offset by altering delivery schedules and changing driving behavior but are unlikely to ameliorate all of the economic damages. ***Based upon these results, it is estimated that the Shilshole South Alternative will result in significant negative economic impacts to property owners with studied driveways in the Ballard study region.***

And lastly, and directly relevant to the issues studied and addressed in the current DEIS, the draft EDR concluded:

The Ballard study region is a rapidly changing and growing community. ***The analysis conducted in this report determined the likelihood of economic damages from the BGT Missing Link by comparing economic outcomes under each build alternative to the baseline conditions in 2015 for the No Build Alternative....*** As shown in Table 4-4-2, from 2000 to 2014, ***the services industry in Ballard has increased employment share by approximately 18.3% and the manufacturing industry has reduced employment by - 7.5%.*** In addition, recent trends suggest strong growth in rents for multi-family housing, implying strong demand for housing and population growth in the region. Between 2015 and 2040, these economic trends are likely to continue, if not accelerate. ***Hence, industrial and other low-rent land users are likely to face increasing competitive pressure for service based and residential land users.***

12-3 cont.

The operation of the mixed-use trail may add to the competitive pressures facing industrial users and appropriate steps should be taken to avoid or mitigate these damages. (Sect. 6)

While SDOT sought to keep the first draft of the EDR from seeing the light of day, it is incumbent on OPCD to recognize and address how incompatible uses—such as the Missing Link—will undermine the City’s efforts to protect, promote and grow Seattle’s maritime and industrial areas. Just like incremental rezones or improperly sited residential development, a multi-user recreational trail located on Shilshole instead of Leary will tear at the fabric of Seattle’s intertwined and interdependent industrial core, ultimately unraveling and destroying it as the EDR concluded.

To avoid this, OPCD should revise Goal BI-G11 in the 2020 Comprehensive Plan, which currently supports locating the Missing Link through the BINMIC so long as it is done with “appropriate” operational and design controls, and instead replace BI-G11 with clear language

prohibiting locating a multi-user recreational trail through the BINMIC and directing that any such trail be located outside the BINMIC through residential or commercial areas. Additionally, the City should similarly revise Policy BI-P15 to more clearly prohibit location and construction of a recreational trail such as the Missing Link through the BINMIC.

12-3 cont.

Lastly, the City should revise the Transportation Figures in Seattle 2035 to eliminate incompatible uses/co-locations. Currently, Transportation Figure 6, Recommended Bicycle Network, depicts the Missing Link on Shilshole, while Transportation Figure 8, Freight Network, correctly indicates that Shilshole is part of the City's Freight Network and is a Major Truck Street. Without question, and as ECONorthwest correctly concluded in the EDR, bicycle trails and Major Truck Streets are incompatible and should not be mixed—both for economic and for safety reasons. If Seattle truly cares about the BINMIC and the City's maritime and industrial lands, businesses and workers, it should and easily can move the Missing Link to Leary where it belongs.

12-4

Salmon Bay, while concerned about the issues discussed above, is encouraged by and supports the City's efforts to strengthen its protections for existing industrially zoned land and its efforts to avoid locating other incompatible uses within or adjacent to such lands. Salmon Bay supports the City's approach articulated in DEIS Alternatives 3 and 4 to make it harder if not impossible to rezone industrial lands to non-industrial uses. Likewise, Salmon Bay supports the approach in those Alternatives to limit locating incompatible uses in these areas. On this last point, Salmon Bay encourages the City to look at the impacts of constructing multi-family dwelling units on Market Street next to existing heavy industrial uses as an example of such uses and, after doing so, encourages the City to develop and adopt regulations to keep such incompatible uses from further undermining the industrial businesses in the BINMIC.

12-5

On behalf of Salmon Bay and the larger BINMIC community, thank you for the opportunity to comment on the DEIS. We look forward to the City's responses and next steps.

Sincerely,

BROWER LAW PS

/s/ Josh Brower

JOSHUA C. BROWER

Attachment: EDR pages

cc: Client

4.2 Impacts Common to all Build Alternatives

The construction of the Burke-Gilman Trail Missing Link will result in changes to accessibility, transportation patterns and infrastructure in the Ballard region of Seattle. The resultant changes in operation of the BGT are likely to induce alterations to the economic landscape of businesses and residents of Ballard. Some economic impacts will manifest in short run disruptions in business and commuting activity due to trail construction. Over the long run, once the trail becomes operational, the local economy will adapt to accommodate the presence of the trail. The operational impacts may entail some “winners”, those whose business and residents benefit from increased accessibility and pedestrian/bike traffic, as well as “losers”, those who are detrimentally impacted by the trail from congestion of existing activity with increased pedestrian/bike traffic.

The construction and operational impacts were assessed primarily based upon the present land use of parcels in the study area. Changes in the facility value, cost of services and amenity value from the presence of the trail will be capitalized into land values. Hence, the economic impacts of the BGT Missing Link were determined by examining the heterogeneous response by land use type (e.g. how the trail will differentially impact different types of land use). The balance of both short and long run costs depend upon two primary factors: 1) the ultimate location chosen for the construction of the BGT Missing Link and 2) the mix of land use in the Ballard study region.

In the following, we describe the methods used to estimate the construction and operational impacts of the BGT Missing Link, which are common to all the build alternatives. The analysis distinguishes the economic effects based upon the 2015 land use in the Ballard area, separated into seven categories: single-family residences, multi-family residences, commercial uses, mixed-uses (commercial and multi-family residential), industrial, vacant and institutional. For a breakdown of the distribution of these land uses in the study area, see Figure 4-2 in the affected environment section.

4.2.1 Construction

During construction of the BGT Missing Link, some parcels may experience significant disruption in operational activity. Significant disruptions are defined as those impacts which are likely to materially damage businesses due to the construction of the BGT Missing Link and for which mitigation measures are likely to be prohibitively costly or not completely remediative. Industrial properties may experience reduced or no access for deliveries during certain periods of the day. Retail properties may lack accessibility and due to construction, may be less attractive to potential customers. Residents and commuters passing through the region may experience delays in commutes due to lane closures.

4.2.2 Operation

The long-run operational impacts of the BGT Missing Link were assessed by evaluating how proximity to mixed-use trails in other areas of King County were capitalized into land values. Data has been collected for recent parcels sales from 2005 to 2015 and home attributes in King County, WA. We grouped these transactions into four distinct categories: single family residences, multi-family apartments, commercial uses and industrial uses. Once separated by land-use, these data were utilized to estimate hedonic pricing models to determine the effect that proximity to existing trail infrastructure has on property value from observed market transactions.

Hedonic pricing analysis is an econometric methodology used to statistically distinguish the value of product attributes from a composite good, such as housing, by examining variation in the determinants of market transactions. Appendix A provides an overview of the application of hedonic theory to analyzing housing market transactions.

hour (BLS, 2014). This implies that each additional minute spent in traffic costs the average Seattle area commuter with an average value of time approximately \$0.24 in terms of lost time due to traffic congestion. If expected wage growth between 2015 and 2040 exceeds the inflation rate, this per minute cost of delay would grow over the medium term. Hence, these results imply that decreasing the expected wait time at newly signalized intersections and at driveways could generally improve the welfare of drivers by decreasing commute-related delays, all things being equal. By contrast, any increases in wait times could reduce driver welfare by increasing the amount of time spent on the road.

The impacts of the four Build Alternatives were determined using an opportunity cost model of travel time. The affected environment selected to study the transportation impacts was identical to that used for the Transportation Discipline Report (Parametrix, 2016a), which is discussed in Chapter 5. The study area for the Transportation Discipline Report is shown in Figure 5-3 in the Transportation Discipline Report. This figure provides a visual representation of the affected environment and the various study intersections, driveway turnouts, and peak day travel volume. For purposes of this analysis, the baseline conditions were assumed to be the conditions of the No Build Alternative in 2040. These baseline conditions are based on the assumption that the trail segment is not built and traffic growth continues under the No Build Alternative. Changes in delay times resulting from the Build Alternatives are compared to this baseline to determine the impacts specific to each alternative.

Study Area Parking Supply

The study area averages a parking utilization rate of between 60% and 67% for weekdays, depending on time of day (Parametrix, 2016b). The study area includes commercial, mixed-use, industrial, and residential areas. Although SDOT does not set target utilization rates for residential and industrial areas, the average utilization rates are below the target utilization rate of 70% to 85% for commercial and mixed-use areas in Ballard.

All of the Build Alternatives would result in some loss of on-street parking supply. Given the relatively modest rate of parking utilization, the study area should be able to absorb some loss in parking supply without raising the average parking utilization rate above the SDOT target threshold. However, depending on the spatial configuration of the Build Alternatives, the loss in spaces may somewhat limit the localized accessibility to businesses and residences by automobile travelers. In particular, trail alignments within the Ballard Core paid parking subarea may result in a loss of parking during times of day when parking demand outstrips the available supply. Additional impacts associated with the loss of parking supply may be experienced by businesses that cater to round-the-clock customers during evenings and weekends.

Land Use

The construction of the BGT Missing Link could result in changes to accessibility, transportation patterns, and infrastructure in the Ballard area. The resultant changes in operation of the BGT Missing Link are likely to induce alterations to the economic landscape of businesses and residents of Ballard. Some economic impacts could manifest in short-term disruptions in business and commuting activity due to trail construction. Once the trail becomes operational, the local economy would likely adapt to accommodate the presence of the trail over time. **The impacts may result in benefits to some parties whose business and residents benefit from increased accessibility to pedestrian/bicycle traffic, as well as negative consequences to some who do not benefit from increased pedestrian and bicycle traffic.**

The following sections describe the operational impacts of the BGT Missing Link that are common to all the Build Alternatives. The analysis distinguishes the economic effects based upon the 2015 land use in the Ballard area, separated into nine categories: single-family residences, multi-family residences, commercial uses, mixed-uses (commercial and multi-family residential), industrial, vacant, and

1 The principle benefit that the BGT Missing Link operation would provide to industrial uses in the Ballard
2 area is by improving accessibility of these locations to their employees.

3 How Mixed-use Trails Negatively Impact Property

4 The operation of the BGT Missing Link may significantly impede some industrial users located adjacent
5 to the trail due to the congestion of industrial traffic and pedestrian use. Significant impacts mean that
6 these industrial users are likely to experience disruptions to business activity that are unlikely to be
7 overcome or mitigated without large cost. Industrial uses may be required to adjust delivery patterns
8 where the build alternatives cross loading docks or driveways. In addition, the operation of heavy
9 machinery and trucks in an environment with more pedestrian and bike travelers may increase risk of
10 accident somewhat. Increases in risk of automotive accidents could result in higher insurance cost or
11 require additional labor expenditures to employ traffic flaggers to avoid collisions. Industrial
12 businesses may adapt somewhat by adjusting delivery schedules to times of day with relatively few
13 pedestrian and bikers using the BGT. This may result in more scheduled hours of operation and
14 higher labor costs for these users. These additional operating challenges are likely to increase costs of
15 production for these users and are unlikely to be able to pass these costs on to consumers. Minimizing
16 the number of industrial driveway and loading dock crossings may reduce these potentially adverse
17 impacts.

18 Figure 4-2-2-7 shows the location of industrial and warehouse properties located adjacent to one or more
19 of the build alternatives in the study region. There are a total of 81 industrial or warehouse properties
20 that may be directly or indirectly impacted by the operation of the BGT Missing Link, depending upon
21 which build alternative is selected. Of these properties, a total of 16 properties have an assessed value
22 in excess of \$1 million. However, the operation of these properties is only expected to be significantly
23 impacted for those properties where the primary access point or loading docks are crossed by the
24 mixed-use trail. At these points, the congestion of pedestrian and bike travelers with industrial traffic
25 may cause significant economic harm. Significant impacts result from the interference of the business
26 operations of industrial properties due to pedestrian and bicycle traffic. This interference may result in
27 decreased profitability and in extreme cases, result in some industrial users going out of business. For
28 each build alternative, a list of potentially affected industrial properties along with a subjective
29 ranking of the significance of the expected impacts are provided in Sections 4.3 to 4.6.

1 The principle benefit that the BGT Missing Link operation would provide to industrial uses in the Ballard
2 area is by improving accessibility of these locations to their employees.

3 How Mixed-use Trails Negatively Impact Property

4 The operation of the BGT Missing Link may significantly impede some industrial users located adjacent
5 to the trail due to the congestion of industrial traffic and pedestrian use. Significant impacts mean that
6 these industrial users are likely to experience disruptions to business activity that are unlikely to be
7 overcome or mitigated without large cost. Industrial uses may be required to adjust delivery patterns
8 where the build alternatives cross loading docks or driveways. In addition, the operation of heavy
9 machinery and trucks in an environment with more pedestrian and bike travelers may increase risk of
10 accident somewhat. Increases in risk of automotive accidents could result in higher insurance cost or
11 require additional labor expenditures to employ traffic flaggers to avoid collisions. Industrial
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28 each build alternative, a list of potentially affected industrial properties along with a subjective
29 ranking of the significance of the expected impacts are provided in Sections 4.3 to 4.6.

1 value to industrial properties to +6.4% impact for parking facilities. The overall expected impact on
 2 property values in the study area is +2.8%. However, based upon the econometric models presented
 3 in the appendix, the only statistically significant economic impact is for single-family homes, with a
 4 modest +0.4% increase in property value. Hence, the overall conclusion from this analysis is that, on
 5 average, properties in the study area are likely to be negligibly to slightly positively impacted by the
 6 operation of the Shilshole South Alternative.

7 **Table 4-3-1: Economic Impact of Shilshole South Alternative Operation by Land Use Type**

Impact	Dollar Value	Percentage Impact
Commercial	\$36,487,892	6.3%
Industrial	-\$11,476,506	-4.2%
Institutional	-\$28,802	0.0%
Mixed-use	\$20,328,034	5.0%
Multi-family	\$25,330,126	3.9%
Parking	\$3,932,717	6.4%
Single-family	\$1,892,153	0.4%
Vacant	\$4,003,661	1.5%
Total	\$80,469,275	2.8%

8

9 Commercial, multi-family, parking and single-family properties all witness appreciation in property value
 10 under the Shilshole South Alternative. Improvements in parcel accessibility and increased business for
 11 retail properties from pedestrian and bike users all contribute to gains in parcel values. Industrial and
 12 institutional properties experience some decreases in value, though on average, these effects are
 13 statistically insignificant. Industrial properties may experience some disruption to business due to
 14 congestion of pedestrian and industrial freight traffic. While the industrial users are likely to undertake
 15 some actions to mitigate the increased costs, the cost of operating in the study area may increase.

16 Adjacent Industrial and Warehouse Properties

17 Table 4-3-2 shows the expected economic impact to those properties identified with significant operations
 18 adjacent to the Shilshole South Alternative. Economic impact is ranked on a 1 to 5 scale, with 5 being
 19 most affected. This subjective scale captured the degree to which current operations and accessibility
 20 are likely to be impinged by the operation of the Shilshole South Alternative for the BGT Missing
 21 Link. A value of 4 or 5 indicates a high likelihood of significant impacts from positioning of the trail.
 22 Trail configurations that cross active loading docks and driveways for businesses with frequent
 23 deliveries are most likely to experience significant disruption. To the extent possible, driveways and
 24 loading docks that may be crossed by the BGT Missing Link were also identified. Of the properties
 25 identified, it is expected that the Ballard Marina and Salmon Bay Sand and Gravel may be
 26 significantly impacted by the operation of the Shilshole South Alternative.

Vacant Properties

There are several vacant properties in the study area. Since the future land uses of these locations are constrained by the allowable zoning, economic impacts were assigned based upon the current zoning of these locations. For instance, if a parcel is zoned primarily for commercial uses, economic impacts were based upon estimates from the commercial property model.

Institutional, Government, Military, School, Public, Parks and Open Space

Many government-owned properties are located in the study area, including institutional, government, military, school, public, as well as parks and open space. While it is theoretically possible that the operation of the BGT Missing Link may cause some impacts to these properties, current Washington State law (RCW 84.40.045 and 84.40.175) prevents assessors' offices from collecting information on the value of government-owned parcels. Hence, in the absence of sufficient market transactions and with a lack of data for valuation, it is presently impossible to quantify the economic impacts to government-owned parcels in the study area.

Other Properties

Due to lack of comparable properties from elsewhere in the King County region, economic impacts were not assessed for properties whose dominant land use is recorded as "other" in the study area. However, these parcels represent a minority (less than 5%) of the acreage and parcel values. In addition, based upon the statistically derived results for the other land uses, other parcels are likely to be unaffected by the operation of the BGT Missing Link.

4.3 Shilshole South Alternative

4.3.1 Construction

Construction impacts common to all Build Alternatives are discussed in Section 4.2.1.

4.3.2 Operation

The Shilshole South Alternative would likely have relatively modest effects on area property values over the long term. The only land use type with statistically significant impacts is single-family residential properties (see Table C-1, Appendix C). Operation of the Shilshole South Alternative would likely result in an expected increase in single-family residential property value of \$1.9 million or 0.4%.

All other major land uses in the study area would likely experience statistically insignificant impacts from proximity to the multi-use trail. While other property types are unlikely to face significant impacts on average, some properties located directly adjacent to the Shilshole South Alternative may face acute impacts from trail operation if their business activities are significantly disturbed by increased pedestrian and bicycle traffic.

Transportation Impacts

The estimated traffic delays for intersections and driveways under the Shilshole South Alternative in 2040 were compiled from the Transportation Discipline Report (Parametrix, 2016a). Intersections were considered to have potentially significant economic impacts where expected delays for the 2040 Shilshole South Alternative would be at least 20% larger than those predicted for the 2040 No Build Alternative

1 On average, compared to the No Build Alternative, traffic delays at study intersections are expected to
2 reduce the value of traffic damages by approximately -4.8%. However, the traffic damages to studied
3 driveways are expected to increase, on average, by approximately +21.2%, relative to the baseline No
4 Build Alternative. While the overall benefits to reductions in intersection delays are likely to be
5 dispersed among businesses, residents and commuters, the damages from driveway delays will be
6 capitalized into the value of the properties that own these locations.

7 If capitalized into 2015 dollars using a discount rate of 3.5% and a capitalization rate of 6.0%, the capital
8 cost of driveway delays are equivalent to a total value of approximately -\$1.4 million. Some of these
9 costs may be offset by altering delivery schedules and changing driving behavior but are unlikely to
10 ameliorate all of the economic damages. Based upon these results, it is estimated that the Shilshole
11 South Alternative will result in significant negative economic impacts to property owners with
12 studied driveways in the Ballard study region. These impacts are defined as significant because the
13 capitalization costs exceed more than 1% of the current appraised parcel value.

14 Parking Damages

15 Based upon estimates from the Parking Discipline Report (Parametrix 2016b), the Shilshole South
16 Alternative will result in a loss of parking equivalent to 261 spaces. This reduction represents 8% of
17 the on-street parking supply and 7% of the total parking supply in the region. The Shilshole South
18 Alternative will also result in the greatest loss of parking of any build alternative. Based upon
19 estimates of the current parking utilization rate in the region, assuming that parking demand remains
20 unchanged from the No Build Alternative, the average parking utilization rates will increase to
21 between 66% to 73% for the study region.

22 These estimates are in line with SDOT's target utilization rate of 70% - 85% for commercial and mixed-
23 use areas. The reduction in parking from the Shilshole South Alternative is unlikely to result in acute
24 shortages of parking supply. There are only relatively few locations adjacent to the Shilshole South
25 Alternative with large amounts of retail or residential uses, where automobile traffic and parking
26 utilization tends to be highest. A total of 48 out of 128 properties along this alternative are used for
27 commercial, mixed-use or multi-family purposes. Reduced parking from the Shilshole South
28 Alternative are not expected to cause significant economic damages because neighboring streets are
29 likely to absorb demand from lost parking supply without reducing accessibility to parcels or
30 increasing utilization above critical thresholds.

31 **4.4 Shilshole North Alternative**

32 **4.4.1 Operation**

33 The expected economic impacts from the operation of the Shilshole North Alternative are reported in
34 Table 4-4-1. The overall economic impacts to the study region are equivalent to an expected net
35 increase of +3.0% in property values. In this scenario, industrial properties are slightly more
36 negatively impacted than the Shilshole South Alternative but other land use types are generally more
37 positively affected. However, considering that single-family homes are the only land use type
38 expected to report a statistically significant impact from the construction of the BGT, these results
39 imply that the average impact from the Shilshole North Alternative is likely to be negligible to
40 slightly positive. In addition, these impacts are in the same range as those predicted for the Shilshole
41 South Alternative.

42

1 Chapter 5: AVOIDANCE, MINIMIZATION, AND MITIGATION
2 MEASURES

3 **5.1 Measures Common to All Build Alternatives**

4 **5.1.1 Construction**

5 Construction of the BGT Missing Link may significantly impact business and commuting operations in
6 the short term. While these damages will be short-lived, nevertheless, mitigation measures should be
7 adopted to reduce the severity of these economic effects.

- 8 / Local access to should be maintained to businesses and residential property to minimize
9 disruptions to automotive, freight, bicycle and pedestrian traffic.
- 10 / Posted signage and displays notifying the public of construction schedule and anticipated lane
11 closures.
- 12 / Adding in short term parking in locations with significant temporary losses in on street parking.

13 **5.1.2 Operation**

14 The results of this analysis suggest that on balance, the operation of the BGT Missing Link will likely
15 have a net positive economic impact on the region in each build alternative. However, some
16 businesses and residents may experience some acute economic impacts. These impacts may be at
17 least partially mitigated through the following options:

- 18 / Industrial and warehouse users will likely experience the largest economic losses. Choosing an
19 alternative and setting a route with minimal crossing of drive-in-docks and driveways will help
20 minimize disruption to these users.
- 21 / In high traffic intersections and locations with large amounts of freight deliveries, including
22 controlled pedestrian crossings with stop signs or traffic arms on the mixed-use trail may help
23 improve safety and limit disruption to local businesses.

24

1 Chapter 6: CUMULATIVE IMPACTS

2 The Ballard study region is a rapidly changing and growing community. The analysis conducted in this
3 report determined the likelihood of economic damages from the BGT Missing Link by comparing
4 economic outcomes under each build alternative to the baseline conditions in 2015 for the No Build
5 Alternative. However, over the medium to long term, the Ballard study region is likely to experience
6 significant socio-economic and industry changes, regardless of whether or not the BGT Missing Link is
7 constructed. As shown in Table 4-4-2, from 2000 to 2014, the services industry in Ballard has increased
8 employment share by approximately 18.3% and the manufacturing industry has reduced employment by
9 -7.5%. In addition, recent trends suggest strong growth in rents for multi-family housing, implying strong
10 demand for housing and population growth in the region. Between 2015 and 2040, these economic trends
11 are likely to continue, if not accelerate. Hence, industrial and other low-rent land users are likely to face
12 increasing competitive pressure for service based and residential land users.

13 The operation of the mixed-use trail may add to the competitive pressures facing industrial users and
14 appropriate steps should be taken to avoid or mitigate these damages. However, the economic impacts
15 from the operation of the BGT Missing Link are likely to be smaller than those presented by anticipated
16 regional changes even in the absence of the addition of the trail.

17

DRAFT

Holmes, Jim

From: JT Cooke <JT@houlihan-law.com>
Sent: Wednesday, March 02, 2022 1:33 PM
To: PCD_Industry_And_Maritime_Strategy
Subject: Seattle Industrial and Maritime Strategy DEIS Comments
Attachments: Signed Industrial DEIS.pdf

CAUTION: External Email

Hello,-
Please see the attached comments that I have been asked to submit on behalf of Fremont Dock Company.
Thank you,
JT



100 N. 35th Street ■ Seattle, WA 98103

JOHN T. (J.T.) COOKE
ATTORNEY

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NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents.
Thank you.

EST. 1947
FREMONT DOCK CO.
REAL ESTATE

February 28, 2022

Via email: PCD_Industry_And_Maritime_Strategy@seattle.gov.

Seattle OPCD

Attn: Geoffrey Wentlandt & Jim Holmes

PO Box 94788

Seattle, WA 98124-94788

RE: Seattle Industrial & Maritime Strategy Draft Environmental Impact Statement

Dear Mr. Wentlandt and Mr. Holmes-

Thank you for the opportunity to comment on the Seattle Industrial & Maritime Strategy Draft Environmental Impact Statement ("DEIS"). Fremont Dock Company ("FDC") owns properties in the DEIS Study Area (Ballard and Fremont). For over 60 years, FDC has assisted established and start-up companies alike with their real estate needs. Throughout that time, it has partnered with its tenants and the surrounding neighborhood to make Fremont the thriving neighborhood that it is today. The proposed comprehensive plan changes and commensurate zoning changes will have a significant impact on FDC's ability to meet the needs of its current and future tenants and the larger Fremont community.

13-1

FDC is also a member of the Ballard Council and North Seattle Industrial Association, a neighborhood advisory group to Mayor Durkan's Industrial Maritime Strategy Council ("ISMC"). Fremont Dock participated in the ISMC meetings to provide input on and craft changes the Industrial General Zoning for the MIC and BINMIC areas. These comments are broken into two sections. The first section provides general comments to the DEIS. The second section addresses specific mapping requests with respect to the planned designations in the vicinity of Fremont and application of future development regulations.

General Comments on the DEIS

A. The Proposal is a De Facto Zone Change and Must be Considered Together with the Specific Implementing Development Regulations

The DEIS is inadequate because the City has not proposed (and therefore cannot assess the impacts from) the specific development regulations that will implement the proposal. The DEIS positions the proposed action as a comprehensive plan amendment and declares that specific development standards will be developed later (and presumably assessed in a subsequent or supplemental EIS). The proposal, however, is a de facto rezone and the specific, implementing zoning regulations must be included to assess the environmental impacts adequately and reasonably.

13-2

While the DEIS posits the proposal as an amendment to the comprehensive plan it admits in numerous instances that it is a "rezone". *See e.g.* DEIS at 1-43 ("The alternatives differ in the amount of area that would be rezoned as well as the number of residential units that would be constructed."); 1-63 ("Alternatives 2, 3, and 4 feature different amounts of land rezoned to the proposed new UI and II zones that would allow denser development—with alternatives 3 and 4 having more land rezoned to II or UI.").

The proposed boundaries of the new industrial land designations in the comprehensive plan will become the de facto boundaries of the corresponding industrial zones. As with any rezone, the environmental impacts can only be adequately assessed based upon the specific development regulations that will implement the zone designations and policies.

The Growth Management Act requires that municipalities adopt development regulations that are consistent with and implement the comprehensive plan. Thus, once the plan designations, policies and map amendments are adopted the City must adopt implementing regulations that are consistent with the designations regardless of the impacts the specific regulations might have. Piecemeal, or phased, environmental review is inappropriate in cases such as these:

An off-cited reason for denying piecemeal review is that it may permit adverse consequences to go unidentified until after the project has so progressed that preventing its completion, or mitigating its consequence, becomes either unlikely or impossible.

Cathcart-Maltby-Clearview Comm. Cncl. V. Snohomish Cnty., 96 Wn.2d 201, 210 (1981). Here phased or piecemealed environmental review of what amounts to a zone change without the context of the specific development regulations is inappropriate because the zoning boundaries are being set by the proposed action. And, because the City has elected to marry the comprehensive plan designations to the future zones, moving zone boundaries to mitigate for unknown and unknowable impacts from the specific development regulations to mitigate those impacts becomes unlikely or impossible.¹

The City cannot and should not leave parties having to guess what the possible impacts of the proposal will be. And, parties are forced to guess unless and until specific development regulations that are consistent with the new policies are proposed. SEPA requires more.

To the extent that City decides to proceed with phased review, which it should not, it should confirm in the FEIS that the selected boundaries for the new plan designations and zones are subject to change during environmental review of the specific implementing development regulations.

B. The “Action” or “Proposal” is not Sufficiently Defined to Allow Meaningful Environmental Review Because “Industrial” is not Defined

The inability to adequately assess impacts because of the lack of specific development regulations is highlighted by the absence of a concrete proposal of what is and is not “industrial”. The DEIS mentions “industrial” 2,862 times over 722 pages. Yet, nowhere does the DEIS comprehensively define either by policy or regulation what is or is not industrial. The DEIS cannot meaningfully review the alternatives or

¹ The inability to move boundaries to address impacts during review of the specific development regulations cannot be understated. As part of the proposal the City proposes to prohibit changes to the proposed industrial designations to non-industrial uses unless it is part of a City-initiated study or major update to the Comprehensive Plan. (DEIS 3-245).

the environmental impacts of the new designations and policies for industrial lands without qualifying what it means by “industrial”.

For example, and without limitation, one of the objectives, if not the primary objective, for the proposed action is the preservation of land for “industrial” job growth and creation. Accordingly, the DEIS assesses the industrial employment projections of the various alternatives. Buried in a footnote, however, is a statement that industrial employment numbers relied upon by the DEIS include jobs in Information Computer Technology. (DEIS at 2-44). It is not clear how the DEIS can project employment numbers under the various alternatives without a policy or development regulation defining whether and to what extent uses that generate ICT jobs (among other categories of jobs) will be allowed in some or all the new zones.

13-3
cont.

The Seattle Maritime and Industrial Strategy Updated Employment Trends and Land Use Alternatives Analysis (“ILETL”) acknowledges that companies that generate large number of ICT jobs are typically classified as “office” uses:

ICT has been growing significantly in industrial areas, at an annual average rate of 10.4% from 2010 to 2018 and 8.4% from 2000 to 2018. With Expedia locating their Seattle headquarters in the Interbay Neighborhood and an Amazon office already present here, ICT is expected to continue growing in industrial areas.

(ILETL at 16 (emphasis added)). Expedia’s headquarters and Amazon offices are “office” uses. The proposed general development standards would seem to prohibit or significantly restrict uses in the study area that would permit the projected increase of ICT jobs referenced in the ILETL like a technology headquarters or office.

C. The Alternatives are not Reasonable Because they are Inconsistent with the Locational Criteria and Proposed Policies

The alternatives do not reflect the location criteria for the new designations and are not reasonable. For example, one of the criteria for MML is that lands designated MML be within a MIC. Yet, all alternatives designate land outside of MICs as MML. For example, and without limitation, Alternative 2 designates land that is currently outside of the BINMIC and zoned Industrial Buffer and Industrial Commercial as MML along NW Market and Leary Way NW.

13-4

Likewise, all alternatives designate areas dominated by small parcels as MML. For example, and without limitation, the DEIS acknowledges that parcels fronting N. 36th in the Fremont Urban Village are small (DEIS at 3-263), yet most of the area is designated MML contrary to the predominate parcel sizes and existing built environment. All alternatives also appear to designate the land along 14th Ave south of 51st as MML even though the lots between 50th and 51st are predominantly smaller in size. The general development standards state that areas within ¼ to ½ mile of existing or planned transit stations should be designated II. Alternatives 2 and 3, however, do not designate II within Sound Transit’s planned stations in Ballard, and elsewhere. In order to properly evaluate impacts the proposed alternatives must be in alignment with the proposed locational criteria.

Finally, the alternative maps are not sufficiently clear and may conflict with the textual descriptions. The alternative maps do not provide a sufficient degree of detail to determine actual zone boundaries. As a result, the text describing the alternatives conflicts with the maps depicting the changes. For instance, the Land Use Compatibility section discussing Alternative 3 in Ballard states that the “Ballard uplands in the 14th Avenue NW corridor north of NW Leary would be placed in the UI zone”. (DEIS 3-295). Yet, the map for Alternative 3 shows MML north of Leary Way NW along 14th up until what appears to be 52nd. It is impossible to assess, much less comment on, the impacts of these boundaries without clear delineation of the proposed boundaries.

13-4
cont.

D. The DEIS is Inadequate Because the Alternatives are not Adequately Segregated or Assessed for Each Sub-Area in the Study Area

The DEIS acknowledges that the characteristics of the study area vary greatly. The characteristics of the BINMIC and its surrounding areas are entirely different from those in the Duwamish MIC and its surrounding areas. Yet, the DEIS alternatives present a one-size fits all approach to reviewing and considering alternatives. The DEIS’s alternative analysis forces selection of a single alternative based on its ability to meet objectives and minimize impacts on a region-wide basis instead of a subarea basis. This is inconsistent with SEPA and poor policy making.

13-5

The City should follow the lead of other government entities and propose, review and select alternatives on a sub-area basis. For example, Sound Transit commonly proposes alternative alignments for discrete sub-areas of a larger expansion which allows them to evaluate and select alternatives that best achieve objectives and minimize environmental impacts on sub-area basis. (See e.g. West Seattle and Ballard Link Extension Draft Environmental Impact Statement). This approach is not only required by SEPA, but will result in an alternative analysis and selection that best meets the objectives and the needs of each subarea.

E. The DEIS Does not Adequately Consider Sound Transit’s Planned Ballard Light Rail Extension Project.

The DEIS is inadequate because it fails to consider Sound Transit’s planned light rail expansion through significant portions of the study area. For instance, Sound Transit’s Ballard Extension considers four alignments through the Study Area. Sound Transit anticipates selecting a location in 2023. The ultimate selection will place a light rail line and a light rail station in the areas under consideration including Interbay and Ballard.

13-6

The location criteria for MML requires large parcel sizes. Some of the route selections would bisect existing parcels rendering them unsuitable for MML—not to mention unsuitable for actual development. Similarly, there are four stations proposed between 15th Ave NW and 16th Ave NW and NW Market Street. The locational criteria for the proposed II designation is within ¼ mile (1,320 feet) or ½ mile (1,640 feet) of an existing or planned high capacity transit station. None of the alternatives map or assess the II designation to account for a station in this area. A ½ mile radius around the planned stations

along NW Market would encompass the area as far west as 24th and Market and as far south as Salmon Bay.

13-6
cont.

F. The DEIS Does Not Adequately Assess Impacts on Land and Shoreline Use

The DEIS Does Not Adequately Assess Impacts on Land and Shoreline Use because it does not consider how implementation of the new policy and mapping changes will impact the existing built environment and does not assess conflicts with Shoreline Management Program. The general development standards in the DEIS propose significant departures from current development regulations and sites developed under those regulations. For example, areas presently zoned IG2 are allowed to develop and have been developed with 25,000 square feet of office. The proposal would designate most of the IG2 zoned property to MML and limit office to 10,000 square feet. The DEIS makes no attempt to determine how implementation of those general development regulations might conflict with current permitted development and the non-binding general development standards are silent (with the exception of II) with respect to how the nonconforming uses created by the proposal will be addressed.

Additionally, the DEIS does not adequately assess impacts on shoreline use. The DEIS asserts that “[n]o amendments [to the SMP] are a part of the proposal”. (DEIS at 3-253.) This is incorrect. Development in the shoreline must meet the development standards of both the underlying zone and shoreline designation in which it is located. SMC 23.60A.016.B; -C.1. Thus, the SMP incorporates the regulations of the underlying zone if they are more restrictive. The proposed Comprehensive Plan polices and general development regulations that will implement those policies will result in de-facto changes to the SMP by prohibiting or further restricting development and uses that are otherwise allowed in the SMP. For example, much of the current shoreline along the canal is zoned IG and is located within the Urban General, Urban Industrial and Urban Maritime Environments. All of these designations permit “non-industrial” uses that the planned amendments would either eliminate or significantly restrict. The DEIS does not assess these conflicts with the SMP.

13-7

Finally, the DEIS does not assess how limiting previously allowed non-industrial uses will impact the availability of services to the growing populations in and around the Study Area. By restricting the size and type of non-industrial uses the City is limiting the available land for services provided by those uses. For instance, much of the development in the BINMIC study area that the City now perceives as undesirable occurred, in part, because of changes the City made to neighborhood commercial zones that restricted the size of certain commercial uses like grocery stores. The inability of these services to locate in NC zones proximate to their customer base likely forced them to locate to the next closest area—the industrial zones. The impacts of further restricting these uses in the new industrial designations will have impacts that have not been addressed in the DEIS including, but not limited to, transportation impacts and air quality impacts as residents of neighborhoods proximate to the Study Area will be required to travel further away from their neighborhoods to secure goods and services.

G. The City Should Assess Purely Economic Impacts

The City emphasizes the need to examine the “equity” impacts of its proposal while steadfastly maintaining that it has no obligation to address “purely economic impacts on individual businesses.” (DEIS 3-273). The purely economic impacts to existing businesses and land owners in the Study Area from the

13-8

proposal are significant. The Proposed Action, as far as we can tell, will result in a significant downzoning of the Study Area. These economic impacts will extend far beyond impacts to the business and land owners in the study area.

The City discounts economic concerns by claiming that “[a] wide variety of land uses would be allowed . . . under all alternatives sufficient for robust economic use of property.” The statement is self-serving, lacks support and ignores that the City has not presented the proposed development regulations that will implement the new policy changes. If indeed a wide variety of land uses will be allowed the City should specify those uses now and allow those persons most familiar with economics of development and managing property in the study area to determine whether they provide sufficient robust economic use of property as the City contends they will—not to mention whether they will encourage redevelopment of land in the Study Area.

13-8
cont.

Specific Amendments to the Mapped Boundaries and Other Considerations

As noted above, it is impossible to determine how the proposal will impact use of property in the Study Area without the specific development regulations that will apply in each zone. Nevertheless, based on the limited information available we believe the following changes to the proposal should be made:

1. All Industrial Commercial and Industrial Buffer Zoned Property East of Third Avenue Northwest to the Aurora Bridge Should Remain or be Change to Industrial Commercial

The DEIS notes that the City’s industrial and maritime policies are more than 35-years old. Indeed, much of land use regulatory framework that presently applies to the Study Area was adopted in 1994. The City has changed dramatically since then and there are areas in the Study Area that no longer meet the locational criteria for the type of “industrial” development under consideration. The portion of the Study Area east of Third Avenue to the Aurora Bridge is one of those areas (“East Third Avenue Area”).

The East Third Avenue Area supports a robust mix of traditional “industrial” uses as well as high-tech and other “industrial” uses. The East Third Avenue Area has changed significantly in the last 30 years. For example, the Fremont Lake Union Center and Quadrant Lake Union complexes that dominate the area were constructed in 1999 and 2001 respectively. Those two projects triggered a redevelopment renaissance of what was an industrial area into a compact mixed-use neighborhood. Additionally, much of the property to the west of these two development consist of small lots that the DEIS itself acknowledges are not likely to be suitable for industrial development. For instance, the portion of the East Third Avenue Area between North 36th Street and North 35th Street is dominated by small lots. Industrial uses in this area are the exception—not the norm. The proposed plan designations and corresponding zoning regulations would render much of the existing development in the East Third Avenue Area non-conforming.

13-9

The City has not taken a hard look at whether its new, more restrictive industrial designations make sense here, much less what the impacts would be to the existing built environment and surrounding neighborhoods. Under the current zoning regime this entire East Third Avenue Area should be considered

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for Industrial Commercial ("IC"). The Proposed Action would eliminate IC and none of the new zoning designations appear to allow the same type and density of uses that the current IC zone permits. The City should consider keeping IC and applying it to areas outside of the MICs like the East Third Avenue Area. Alternatively, the City should consider a fourth designation similar to IC that could be applied to areas like the East Third Avenue Area.

13-9
cont.

2. All Property Currently Zoned Industrial Buffer in the Study Area East of the Aurora Bridge to I-5 Should Be Zoned Industrial Commercial

The properties zoned Industrial Buffer east of Aurora never made sense. As its name suggests, Industrial Buffer was intended to buffer heavy industrial uses (allowed in Industrial General) from surrounding neighborhoods. There is no Industrial General zoned property east of the Aurora Bridge to buffer. The characteristics of this area are more aligned with Industrial Commercial. The City should maintain the IC zoning regime and designate this area as IC or, alternatively, create a new industrial designation that has similar regulations to the current IC regulations and apply it to former industrial zoned lands east of the Aurora Bridge.

13-10

3. Development Regulations Should Allow Bulk and Dimension Limitations to be Met on a Project-Wide Basis and not a Parcel-by-Parcel Basis

It is not clear from the general development regulations outlined in the DEIS how the City intends to apply the bulk and dimension limitations for projects that span multiple parcels. Viable development in the industrial zones often requires assemblage of multiple parcels. To achieve the redevelopment goals sought by the City the specific development regulations must clearly allow new developments that span multiple parcels to collate the bulk and dimensions limitations for each parcel and to demonstrate satisfaction of those limitations across the entire project instead of on a parcel-by-parcel basis. For example, a project that spans two MML parcels should not have to design a project that meets the FAR limitation for each parcel as if it were being developed independently. Rather the project should be allowed to achieve the FAR limitation across the entire project area.

13-11

Thank you for considering these comments.

Fremont Dock Company



Suzanne M. Burke, President

Holmes, Jim

From: Mike Ciserella <mike@cantera-group.com>
Sent: Thursday, March 03, 2022 7:16 AM
To: Holmes, Jim; PCD_Industry_And_Maritime_Strategy
Cc: Doug Ciserella; Katie Kendall
Subject: Industrial Lands DEIS Comment Letter

CAUTION: External Email

Dear Mr. Holmes,

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (“DEIS”) for the Industrial Lands planning proposal (“Proposal”), notice of which was issued on December 16, 2021. We are also members of the Seattle Industrial Coalition and join in those comments as well. I am a principal at Cantera Development Group and Manager of TOC Seattle Terminal 1, LLC, the owner of the former Time Oil site located at 2737-2805 & 2750-2800 West Commodore Way. The waterward portion of the site is zoned IG1-U/45 and the portion of the site south of Commodore Way is zoned IG2-U/65.

Prior to our purchase of the property, much of the Time Oil site sat unused for years, due to the severe environmental contamination at the site. We decided to purchase the site and voluntarily worked with the Department of Ecology on a plan to clean up the property for over 2.5 years. Our purchase, and the resulting environmental cleanup work that was recently completed, was only made possible due to the development potential for the property allowed by the existing IG2 zoning.

Unfortunately, the City is studying options to rezone this industrial area that would preclude our proposed development, or really any viable development at this site. Under any alternative, our site will be rezoned to Maritime, Manufacturing & Logistics (“MML”), which will, among other things, restrict nonindustrial uses to a 0.4 FAR total, restrict singular non-industrial uses to 10,000 s.f. or smaller, depending on the use, and ban both mini-storage and principal use parking. This new zoning will not encourage a shift back to manufacturing and industrial uses; it will simply continue the current condition of having vacant and underused land. It goes without saying that if this zoning had been in place when the property was purchased, we would not have made the investment at the Time Oil site, and certainly would not have made the investment to clean the contaminated soil. Nor would anyone else.

We encourage OPCD to provide true analysis of the existing conditions and consider additional alternatives that provide flexibility for development in areas of the City that are not currently being utilized for light industrial, industrial, or manufacturing uses. The alternatives that have been utilized thus far only show one option for much of the industrially-zoned land and do not seek to mitigate the real land use, aesthetics and blight, and environmental health impacts that will be caused by the more restrictive change in zoning being considered in this DEIS. For the reasons set forth above and in the Seattle Industrial Coalition’s comment letter, we ask the City to withdraw the DEIS and reissue a new DEIS that addresses and responds to our concerns.

Thanks again for this comment opportunity.

Sincerely,
Mike Ciserella

14-1

Mike Ciserella, PE | Principal

Cantera Development Group, LLC

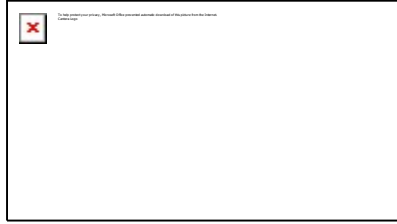
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Holmes, Jim

From: Lindsay McCormick <lindsay@cleantechalliance.org>
Sent: Wednesday, February 23, 2022 4:04 PM
To: PCD_Industry_And_Maritime_Strategy
Cc: Mel Clark
Subject: CleanTech Alliance Comments on DIES
Attachments: CleanTech Alliance DEIS Comments.docx

CAUTION: External Email

Hello!

Please see the attached letter which details the CleanTech Alliance's comments on the DEIS for the Seattle Industrial & Manufacturing Strategy (Seattle SIM).

Thank you for your time today.

Best regards,
Lindsay McCormick

Lindsay McCormick
Policy and Program Specialist

T (206) 389-7280 **E** lindsay@cleantechalliance.org
1301 Fifth Avenue, Suite 1500, Seattle, WA 98101
www.cleantechalliance.org



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Perpetua Resources | Premera | Puget Sound Energy | Snohomish County PUD | Tacoma Public Utilities | UMC
Washington State Department of Commerce



K&L Gates Debate:
Reframing the Discussion:
Building a Better Future by Decarbonizing the Built Environment
March 17 | 3-4:30 PM PT | Virtual



3/21/2022

Office of Planning & Community Development
City of Seattle

To Whom It May Concern:

Introduction. Thank you for the opportunity to provide comments in response to the draft Environmental Impact Statement for Seattle’s proposed Industrial and Maritime Strategy (SIM Strategy). On behalf of the CleanTech Alliance, we are in favor of a comprehensive strategy to strengthen and grow Seattle’s industrial and maritime sectors for the future and commend the updating of related policies and industrial zoning to meet related strategic goals.

Though we are not offering comments on the various action alternatives presented in the DEIS, we support the SIM Strategy’s proposed new industrial zones, particularly the so-called Industry/Innovation Zone that accommodates industrial businesses with compatible research, design, offices, and technology spaces. We also support the designation of the proposed Urban/Industrial Zone to ensure transitions at the edges between industrial areas and neighboring urban villages, residential, and mixed-use spaces.

15-1

Our comments provide additional information that may assist in the selection of the best alternative to successfully update Comprehensive Plan policies concerning industrial land and update the city’s industrial zoning. Zoned areas in Seattle that encourage and support research, development, and deployment (RD&D) for new technologies and home to light manufacturing and industrial businesses are critical to our sector’s growth and vitality.

About the CleanTech Alliance. The CleanTech Alliance represents the state’s cleantech sector, currently employing approximately 90,000 individuals and backed by more than \$200 million in venture capital funding. The CleanTech Alliance has over 1,100 members and was founded in 2007 by Seattle business leaders. Members partner to support and facilitate the formation and growth of cleantech companies, revenue, and jobs through advocacy, networking, education, business development, entrepreneurial support, and talent development. Learn more about the CleanTech Alliance: <https://www.cleantechalliance.org>

The CleanTech Alliance Supports the Seattle Industrial & Maritime Strategy. The Alliance strongly supports the SIM Strategy. Seattle’s two designated industrial centers are already home to cleantech companies focused on reducing greenhouse gas emissions and offering an array of cleantech products and services. The city is well-positioned as a global leader in cleantech innovation and entrepreneurship. The SIM Strategy could further catalyze intentional economic development supporting cleantech innovation and manufacturing and attract cleantech businesses and RD&D facilities in the two designated industrial centers.

15-2

The CleanTech Alliance supports the city’s land-use policy agenda that recognizes innovation and industrial jobs are vital to Seattle's current and future economy. We agree that the city should adopt land-use plans that support:

- Workforce development
- Environmental justice and climate action
- Safe movement of people and goods
- Public safety partnerships, and
- Proactive land-use policy agenda that ensures innovation and industrial jobs are an integral part of the city’s future economy

The Alliance also agrees with the city’s goals for providing strong and durable land-use protection for core industrial and maritime areas. We support policies that encourage high-density industrial development and create



affordable opportunities for small-scale light-industrial businesses and innovators while improving the environmental health of communities in and near industrial areas.

Indeed, the acceleration of actions towards net-zero carbon emissions by industries critical to Seattle's economy – aerospace, maritime, information technology, and online retail – will depend in part on leveraging the region's manufacturing capabilities and its history of innovation in related areas of sustainability, including waste management, recycling, and carbon-free materials management. Encouraging the local production of new low-carbon materials and technologies in Seattle is essential to ensuring net-zero products and materials are available to city residents, businesses, and beyond.

Relying on the SIM Strategy, the city can double down on additional implementing tactics to encourage locally based cleantech innovation-related businesses in Seattle's two zoned industrial centers. This includes creating incentive programs and promulgating tax policies that stimulate the cleantech industry's growth, among other tactics that promote business development and economic sustainability.

The CleanTech Alliance notes that there are recent events and programs aimed at accelerating cleantech innovations and related business development that specifically align with the social and economic goals in the SIM Strategy. Together, they enhance and incent partnership opportunities that can attract public/private sector investments to advance cleantech innovation and business development in the two zoned industrial centers.

Some examples include:

BINMIC - home of Maritime Blue and the Maritime Innovation Center. The Ballard-Interbay Manufacturing & Industrial Center will be home to the Maritime Innovation Center (<https://www.portseattle.org/projects/maritime-innovation-center-0>) and the headquarters for the Maritime Blue cluster initiative (<https://maritimeblue.org>).

Maritime Blue and 14 other partners, including the CleanTech Alliance, have coalesced as the Build Back Better coalition in response to federal funding opportunities. The coalition was recently selected as a finalist for the U.S. Department of Commerce's Economic Development Administration's (EDA) Build Back Better Regional Challenge (see: <https://eda.gov/arpa/build-back-better/finalists/Washington-Maritime-Blue.html>).

Finalists compete for up to \$100 million in grant dollars to support significant infrastructure and workforce development necessary to accelerate innovation for a clean energy and decarbonization future.

Each finalist has already received Phase I funding of \$500,000 to develop proposed projects further and strengthen growth clusters before submitting the second round of Phase II grant applications. The grants will help the consortium integrate the blue economy cluster with other key industries and partners like the CleanTech Alliance to commercialize and manufacture new technologies that decarbonize heavy-duty transportation, reduce emissions, generate local jobs, and provide sustainable economic growth. The main components include:

- Transformational Capital Projects in the Puget Sound and Columbia River Basin regions
- Ongoing Project Pipeline Planning for clean energy and clean tech projects for the port of the future
- Entrepreneurship and Startup Ecosystems
- Equity in Workforce Development

15-2 cont.



The SIM Strategy should mention the city's collaboration with Maritime Blue and the Build Back Better Coalition and how Seattle's industrial zoning and planning support the infrastructure needed to encourage maritime innovation and related enterprise, diverse and equitable workforce development, and access to capital. The SIM Strategy should act as a complementary, if not a critical, aspect of building a thriving, globally competitive blue maritime cluster centered in Seattle.

The Northwest Cleantech Innovation Network (NWCIN) Consortium. The NWCIN, which includes the CleanTech Alliance, and the Washington Clean Energy Testbeds at the University of Washington, Seattle, was recently awarded a U.S. Department of Energy (DOE) Energy Program for Innovation Clusters (EPIC) funding.

The SIM Strategy presents an unparalleled opportunity for the city to actively partner and intentionally strategize with the Marine Innovation Center and NWCIN and locate some of the new compatible businesses emanating from the project in the designated industrial/manufacturing centers covered by the SIM Strategy.

University of Washington West Campus Development and the Center for Advanced Materials and Clean Energy Testbeds (CAMCET). The UW Clean Energy Testbeds, the UW Clean Energy Institute, and the UW-Pacific Northwest National Lab's Northwest Institute for Material Physics, Chemistry, and Technology will be moved to a new building located in the University of Washington's West Campus.

The UW's 70-acre West Campus – *just four miles east from Fisherman's Terminal* - will bring together cleantech researchers with local civic and nonprofit institutions and private companies. The UW West Campus development is designed to encourage partnerships between UW experts and local businesses, government, nonprofit organizations, and the Seattle community and help solve challenges such as achieving a net-zero carbon economy. It will foster an inclusive community that leverages UW's culture of entrepreneurship and innovation.

The SIM Strategy has an unparalleled opportunity to partner with the UW and CAMCET to connect available industrial space with innovations and entrepreneurial activities from UW's West Campus. Linking BINMIC's industrial-innovation zone and the innovation activities at the UW West campus development expands the city's opportunities to serve as a cleantech innovation hub along the Ship Canal and advance Seattle-based manufacturing of clean, renewable energies and materials.

The Armory Site in BINMIC. The SIM Strategy calls for partnering with the state of Washington or future owners on the master planning process for the industrial redevelopment of the 25-acre armory site in the Interbay section of BINMIC. The state has released plans, and the legislature has proposed a public ownership authority to help guide the site's redevelopment. The CleanTech Alliance agrees on the importance of strengthening state and city partnerships to ensure the organizing and planning of the area are aligned and supportive of each other's goals.

We also assert that the redevelopment of the armory site could be an opportunity to showcase cleantech projects and products, similar in scope and scale to the University District in Spokane (<https://www.spokaneudistrict.org>).

The Spokane University District redevelopment is home to the Scott Morris Center for Energy Innovation and the Catalyst building (<https://www.spokaneudistrict.org/smart-city>). Both structures rely on a shared energy model called an Eco-District, where a centralized plant powers the two buildings and additional buildings in the future. The facilities are two of the largest zero-carbon, zero-energy buildings in North America, certified by the International Living Future Institute (ILFI). This collaborative project demonstrates how transformative and innovative approaches to the built environment can be used for new development.

15-2 cont.



The CleanTech Alliance is interested in collaborating with the city of Seattle through the SIM Strategy and the state of Washington through armory site redevelopment planning. We want to explore possible private/public partnerships and projects that will showcase clean energy and net-zero carbon technologies, services, and materials in the built environment. We believe the armory redevelopment site in BINMIC could serve as an innovative eco-district that attracts small businesses and incubator spaces, enhances industrial innovations, and advances the use of net-zero carbon energy practices and building strategies.

Innovation Cluster Accelerator Program – Decarbonizing the Built Environment Cluster: The state of Washington has recently invested in a multi-year innovation cluster development program to help promising industry sectors assemble the ingredients needed to grow, such as increasing access to capital and support for entrepreneurs. The CleanTech Alliance is the recipient of a \$500,000 grant to develop a cluster devoted to decarbonizing the built environment. The Decarbonizing the Built Environment Cluster (DBEC) aims to accelerate an innovation culture in the broadly defined construction and building sector.

15-2 cont.

Like the goals of the SIM Strategy, the DBEC encourages collaborative research and development, incubation, and the acceleration of commercially competitive technologies while ensuring a diverse and trained workforce in construction-oriented trades. Clusters have been proven to increase productivity, create specialized workers, entice investors, encourage rapid innovation, and stimulate strategic business formations.

The CleanTech Alliance and DBEC can serve as key stakeholders to champion the vision of the SIM Strategy, given the remarkable similarity in goals. Seattle's two industrial centers should be home to innovative cleantech-oriented eco-districts that include demonstration projects, incubators, and accelerators to assist cleantech entrepreneurs and businesses and encourage local cleantech manufacturing dedicated to decarbonizing climate goals. We look forward to working collaboratively with the city to leverage the SIM Strategy and support the location of innovative, cleantech businesses in the two industrial centers.

Thank you for the opportunity to comment on the DEIS.

Sincerely,

Mel Clark
President & CEO
mel@cleantechalliance.org
206-389-7201

Holmes, Jim

From: Jessica Clawson <jessica@mhseattle.com>
Sent: Wednesday, March 02, 2022 6:00 PM
To: PCD_Industry_And_Maritime_Strategy
Cc: Holmes, Jim; Wentlandt, Geoffrey
Subject: W Armory Way comment letter
Attachments: DEIS comment letter 3-2-22.pdf

CAUTION: External Email

This is my last one, I promise. Thank you.

Jessica M. Clawson
Partner

[MCCULLOUGH HILL LEARY, PS](#)

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March 2, 2022

VIA ELECTRONIC MAIL

Jim Holmes
City of Seattle OPCD
Seattle, WA 98104

Dear Jim:

Thank you for this opportunity to comment on the draft EIS. We are submitting this comment on behalf of Interbay Urban Investors, the owners of the properties located at 2210 W Armory Way (parcel numbers 2325039045 and -9018). The property is currently zoned and 900 Poplar Place South. The property is currently zoned IG2 and is located in the BINMIC. It is located in the south Interbay corridor (defined as south of the golf course, east of the tracks, all the way to downtown).

The property is nestled between two large retail developments (Michael's, Total Wine, Home Goods, etc., and Whole Foods complex) and the Armory. It is also directly adjacent to 15th Avenue West, which currently includes a Rapid Ride Line, and in the future may include a light rail line. The property is adjacent to C1-55 zoning to the east, and LR2 property is located on Queen Anne/Interbay a block east of the property. The location of this property sandwiched between major retailers and the Armory make it a poor choice for industrial development.

16-1

The DEIS is deficient because it failed to take into account the existing realities of this area of Interbay. Most of this portion of Interbay (south of the golf course, east of 15th, west of the tracks, down to Downtown) is simply not in industrial use any longer. The DEIS failed to undertake any meaningful accounting of the industrial jobs that actually exist in this area, and what contribution to industrial lands this area actually makes. In reality, this area is a mixture of office and retail. It contains the Expedia Campus, hardly an industrial use. The area is well-served by transit and is minutes away from Downtown Seattle via bus. The area is also being studied as part of the future light rail corridor. An alternative must be studied that takes this area out of the BINMIC and out of industrial zoning. The DEIS fails to take into account the years of study that have occurred along the Interbay Corridor regarding potential land use changes. It also fails to take into account what will happen on the Armory property, which may further isolate this property if it isn't allowed to develop in the way the Armory can.

In addition, the alternatives that do not take this area out of industrial zoning must analyze the following impacts of the environment that will suffer significant impacts:

- Contemplation of impacts of nonconformity. If the proposed policies are put into place, many of the properties in this subarea will become severely nonconforming. The 15th Avenue Corridor in this area is one of the City's few remaining thriving commercial retail areas with stores for goods and services finally being provided in an area that sorely needs it (Magnolia and Queen Anne). The DEIS fails to acknowledge what will happen to these

16-2

properties that were permitted to be built into non-industrial uses following the changes to the policies and codes. This impact must be analyzed.

16-2 cont.

- **Housing.** As stated above, the City is in a housing affordability crisis. The DEIS fails to analyze the impact of keeping properties like these, fully surrounded by residential uses and within walking distance of a light rail station and/or frequent transit, locked out of residential use. Even with the new potential zoning designations, which give some limited ability for residential development, housing development will suffer as a result of maintaining this land in industrial zoning. The City must complete an economic and affordability study of the impacts of keeping land such as on housing supply and affordability. The study should also include an analysis of how many affordable units and/or dollars would be provided to the City if the property was rezoned and a higher MHA designation was placed on the property.
- **Housing Displacement.** One of the benefits of taking this property out of industrial zoning is there are no residential uses in this Interbay subarea that would create a risk of displacement. Therefore, allowing residential use here displaces zero existing residents, unlike redevelopment in many parts of Seattle. This impact must be acknowledged and studied; decisionmakers should be able to see the relative different impacts of removing some areas that are no longer industrial from the industrial designation.
- **Suitability for Industrial Lands.** The DEIS fails to analyze whether this property is well-suited for industrial use under the city's and VISION 2050's criteria. The property lacks attributes of good industrial zoning and is surrounded by non-industrial uses. The DEIS must look at these large areas that are no longer in industrial use and determine whether they truly should be zoned industrial. Given the City's intention to lock down industrial lands with the Comprehensive Plan Amendment barring rezones of industrial land outside of major studies/updates, it is paramount that the City complete this study in earnest now. Not doing so is irresponsible as it inappropriately reduces the amount of land Seattle has for housing near transportation.
- **Climate.** The DEIS fails to analyze the impacts of the lost opportunity for housing in this area walkable to frequent transit, and between three existing residential neighborhoods (Magnolia, Queen Anne, Interbay). We are in a climate crisis in addition to a housing crisis; a main contributor of climate gases in the Pacific Northwest is from transportation/cars. Combining housing and transportation together is one of the main strategies to reduce climate emissions, supported by both the City's Climate Action Plan and Comprehensive Plan. Failure to study this area is not reasonable under SEPA and must be included as a new alternative.
- **Air Quality/Noise Issues.** The DEIS discusses these issues but fails to specifically address them in context of this property or Interbay generally. Interbay is nestled between Queen

16-3

16-4

16-5

16-6

Anne and Magnolia, and noise and air pollution from industrial uses impacts residential properties. The DEIS acknowledges that industrial properties should not be located near residential properties without significant buffers; this is definitely not the case for this property or most of the eastern portion of Interbay south to downtown. The impact of keeping this area industrial specifically should be studied in these areas of the environment.

16-6 cont.

- Stormwater/Environmental impacts. As with many older industrial properties, most of the properties in this area include no real stormwater detention or mitigation. There may also be environmental issues underground that will not be cleaned up should redevelopment never occur—due to the lack of real ability to use this property for industrial uses. The impacts of no redevelopment on this property should be studied as part of the DEIS.
- The DEIS has not taken into consideration the Sound Transit EIS that was just issued. Transportation and land use must be coordinated closely, as mentioned above. Alternatives must be studied that seriously take the alignment options into account.
- The DEIS has also not been clear about what may happen to the Armory property and what the relative impact from a land use perspective could be to surrounding properties. This is understandably a state process, but the City should show options on the Armory that could include housing, and should discuss the impacts of that potential change on surrounding properties such as the subject property, as well as the whole south Interbay corridor.

16-7

16-8

16-9

I appreciate the opportunity to comment on the DEIS and I appreciate your consideration of our comments. Most of this south Interbay corridor, including the property and its surrounds, is no longer in industrial use. It is important that the decisionmakers for the Industrial Policies are presented with alternatives that shows them the relative impacts of removing this corridor and this property from industrial designation, since almost the entirety of the corridor is no longer in industrial use today.

16-10

Sincerely,

/s/

Jessie Clawson

Cc: Charles Wathen, Jeff Hummel

Holmes, Jim

From: Jeffrey J. Hummel <jeffrey@hummelarchitects.com>
Sent: Friday, February 04, 2022 1:38 PM
To: Holmes, Jim
Cc: Wentlandt, Geoffrey; Mr. Charles P. Wathen; Jessica Clawson
Subject: Re: Industrial and Maritime Draft EIS
Attachments: Re: Industrial and Maritime Draft EIS

CAUTION: External Email

Holmes, Jim

From: Jessica Clawson <jessica@mhseattle.com>
Sent: Wednesday, March 02, 2022 5:14 PM
To: PCD_Industry_And_Maritime_Strategy
Cc: Skip Slavin (sslavin@newmarkrealtycapital.com); Holmes, Jim; Wentlandt, Geoffrey; Quirindongo, Rico; langer@brodericgroup.com
Subject: Judkins Park EIS comments
Attachments: DEIS comment letter.pdf

CAUTION: External Email

Hi Jim and Geoff,

Attached is a DEIS comment letter for the property located at 900 Poplar Place S. Please acknowledge receipt when you have a chance. Thank you!

Jessica M. Clawson
Partner

[MCCULLOUGH HILL LEARY, PS](#)

701 FIFTH AVENUE, SUITE 6600

SEATTLE, WA 98104

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McCULLOUGH HILL LEARY, PS

March 2, 2022

VIA ELECTRONIC MAIL

Jim Holmes
City of Seattle OPCD
Seattle, WA 98104

Dear Jim:

Thank you for this opportunity to comment on the draft EIS. We are submitting this comment on behalf of Madisonian Manager, LLC, the owner of the property located at 900 Poplar Place South. The property is currently zoned IC-65(M), and is not located in a Manufacturing/Industrial Center (“MIC”).

The property is located in a swath of remnant IC zoning that has never been included in the MIC. It is located just south of Little Saigon/CID neighborhood (located in the Downtown Urban Center), and is located across Rainier Avenue from the 23rd and Union-Jackson Residential Urban Village. Just across Rainier from this property is currently zoned NC3-55, and current development reflects this zoning with large apartment buildings being built to fill the desperate need for housing in the City. The property is well within the walkshed of the Judkins Park light rail station that will be open to the public in 18 months.

17-1

The DEIS is deficient because it failed to study taking this property out of industrial zoning and allowing it to be utilized for housing, just as the property directly to the east, south, and north, also within walking distance of future light rail, are. This is a reasonable alternative to have been studied given the context of the property, the fact that it was never included in the MIC, and the fact that the City is currently in a housing crisis. An alternative must be studied that takes this area of IC zoning out of industrial zoning.

In addition, the alternatives that do not take this area out of industrial zoning must analyze the following impacts of the environment that will suffer significant impacts:

- **Housing.** As stated above, the City is in a housing affordability crisis. The DEIS fails to analyze the impact of keeping properties like these, fully surrounded by residential uses and within walking distance of a light rail station and/or frequent transit, locked out of residential use. Even with the new potential zoning designations, which give some limited ability for residential development, housing development will suffer as a result of maintaining this land in industrial zoning. The City must complete an economic and affordability study of the impacts of keeping land such as this (and in West Ballard, Northlake, and all of the areas that are remnant non-MIC industrial areas) on housing supply and affordability. The study should also include an analysis of how many affordable units and/or dollars would be provided to the City if the property was rezoned and a higher MHA designation was placed on the property.

17-2

- Housing Displacement. One of the benefits of taking this property out of industrial zoning is there are no residential uses in the IC currently. Therefore, allowing residential use here displaces zero existing residents, unlike redevelopment in many parts of Seattle. This impact must be acknowledged and studied. 17-2 cont.
- Land Use Conflicts. As stated above, the property is surrounded and adjacent to housing uses, making it not well-suited for heavy industrial development. The DEIS did not detail the specific impacts in this area of keeping this property industrial, and the relative likelihood of extreme pushback from neighbors in the unlikely event of industrial redevelopment due to industrial incompatibility issues. 17-3
- Suitability for Industrial Lands. The DEIS fails to analyze whether this property is well-suited for industrial use under the city's and VISION 2050's criteria. While it enjoys good access to Rainier/Dearborn/I-5, it does not have the other attributes of good industrial land qualities, which is likely why it was excluded from the MIC. The DEIS must look at these large areas of border-industrial properties and determine whether they truly should be zoned industrial. Given the City's intention to lock down industrial lands with the Comprehensive Plan Amendment barring rezones of industrial land outside of major studies/updates, it is paramount that the City complete this study in earnest now. Not doing so is irresponsible as it inappropriately reduces the amount of land Seattle has for housing near transportation. 17-4
- Climate. The DEIS fails to analyze the impacts of the lost opportunity for housing in this area walkable to light rail. We are in a climate crisis in addition to a housing crisis; a main contributor of climate gases in the Pacific Northwest is from transportation/cars. Combining housing and transportation together is one of the main strategies to reduce climate emissions, supported by both the City's Climate Action Plan and Comprehensive Plan. Yet the City failed to even study a redesignation of property located within walking distance of the Judkins Park station. Failure to study this area is not reasonable under SEPA and must be included as a new alternative. 17-5
- Air Quality/Noise/Environmental Justice Issues. The DEIS discusses these issues but fails to specifically address them in context of this property. This property is an island of industrial property surrounded totally by residentially-zoned property, or property that could be and is being developed as residential. Industrial property next to residential property impacts people with air quality issues, noise issues. In addition, the 23rd and Union-Jackson Urban Village, as well as the CID, are equity areas with many low-income people and people of color who traditionally have been burdened with industrial impacts more than higher-income white people. These areas are directly adjacent to this industrial area. The impact of keeping this area industrial specifically should be studied in this areas of the environment. 17-6
- Stormwater/Environmental impacts. As with many older industrial properties, most of the properties in this area include no real stormwater detention or mitigation. There may also be 17-7

environmental issues underground that will not be cleaned up should redevelopment never occur—due to the lack of real ability to use this property for industrial uses. The impacts of no redevelopment on this property should be studied as part of the DEIS.

17-8

I appreciate the opportunity to comment on the DEIS and I appreciate your consideration of our comments. The City must take the climate and housing crises seriously when drafting these policies that will be very impactful. The Judkins Park area is not suited for industrial use and an option should be studied taking this area out of industrial zoning.

Sincerely,

/s/

Jessie Clawson

Cc: Skip Slavin, Chris Langer

Holmes, Jim

From: Jessica Clawson <jessica@mhseattle.com>
Sent: Wednesday, March 02, 2022 3:44 PM
To: PCD_Industry_And_Maritime_Strategy
Cc: Jim Blais (jblais@gmccinc.com); Holmes, Jim; Wentlandt, Geoffrey; Quirindongo, Rico
Subject: AnMarCo Pier One DEIS comment letter
Attachments: AnMarCo EIS comment letter.pdf

CAUTION: External Email

Hi All,

Attached is a comment letter submitted on behalf of AnMarCo, the owner of the Pier One property. Please acknowledge receipt when you have a chance, and please do reach out if you have any questions or would like to discuss further the contents of our letter.

Thank you!

Jessica M. Clawson
Partner

[MCCULLOUGH HILL LEARY, PS](#)
701 FIFTH AVENUE, SUITE 6600
SEATTLE, WA 98104
DIRECT: 206.812.3378
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McCULLOUGH HILL LEARY, PS

March 2, 2022

VIA ELECTRONIC MAIL

Jim Holmes
City of Seattle OPCD
Seattle, WA 98104

Dear Jim:

Thank you for this opportunity to comment on the draft EIS. We are submitting this comment on behalf of AnMarCo, which owns the property known as “Pier One,” located at 2130 Harbor Avenue S.W. The property is currently located in the Duwamish MIC and is zoned IG2.

AnMarCo has owned the property for three decades. AnMarCo is a company owned by Gary Merlino, who is also the owner of several industrial businesses (Gary Merlino Construction, Stoneway Concrete, among others), and owns many industrial properties located in the Duwamish MIC, the BINMIC, and other industrially-zoned locations around the region. In three decades, despite its expertise in owning, operating, and locating industrial businesses, AnMarCo has been unable to find a long-term industrial user for the property. This is due to the fact that despite “on paper” being a well-located industrial property (located on the water, on a rail tail track, near transportation), this property suffers from several fatal flaws that renders it unusable for industrial development and use. The property has been nearly vacant since 1992. As a user/owner with deep industrial experience, if the property were able to be utilized for industrial uses/industrial development, AnMarCo would have found a way to achieve this use/development. Because it is simply not possible given the property’s attributes, AnMarCo has pursued either a comprehensive plan amendment to take the property out of the MIC/industrial zoning, or a rezone to IC to allow for more flexible uses for the last 10 years. Now that the City is finally undertaking a wholesale review of its industrial lands inventory and policies, an alternative must be studied that takes this property out of the MIC and zone it consistent with its neighbor (Salty’s) to the south (NC zoning).

18-1

AnMarCo’s comments to the draft EIS include:

- An alternative must be studied that takes Pier One out of the MIC. The Pier One property does not meet the criteria of “industrial land” as defined by Vision 2050, the King County CPPs, and the City’s own criteria, in the following manner:
 - The property is too narrow to accommodate industrial uses. AnMarCo has studied industrial development on the property every which way—due to shoreline setbacks and the tail track to the west of the property, it cannot be redeveloped as an industrial building.
 - The property is located on the north side of Jack Block Park, which was built as the visual and sound buffer between the neighborhood and the original development of Terminal 5. Thus, the property is well-suited for redesignation out of the MIC, as

18-2

- there is a physical buffer between Terminal 5 and this property that will reduce land use conflicts.
- The property is located adjacent to single family and multifamily zoning (to the west across Harbor Avenue). The neighbors have complained about any use of the property for industrial purpose, including most recently when the property was utilized for crane storage—the concern was that the cranes being stored impaired residential views of the City skyline.
 - The property is located adjacent to commercially-zoned property to the north (Salty’s Restaurant). Salty’s has complained about the crane storage as well and complains about truck access to and from the property via SW Bronson Way. Salty’s parks their valet cars in the SW Bronson Street right-of-way during peak summer season, often blocking access to the property. The access difficulties via Bronson Way also make the property less available for industrial use, as the right-of-way is narrowed and blocked often by Salty’s—rendering it difficult to use by large trucks.
 - The property has no use of the BNSF-owned tail track and BNSF has made it abundantly clear that AnMarCo will never be allowed the use of this tail track. BNSF sued AnMarCo for illegal crossing of the tail track (the property used to be accessed directly from Harbor Avenue via a driveway over the track). This caused AnMarCo to be required to obtain a driveway access from SDOT from SW Bronson Way. The property is NOT accessible by rail, despite being adjacent to it. Even if BNSF were to cooperate with AnMarCo, only three rail cars would be accessible at a time, prior to reshuffling cars over thousands of feet of tail track, likely making any use of the rail cost prohibitive. This makes a difference in the viability of the property for industrial/rail loading use.
 - The property was studied by the Port as part of the Terminal 5 redevelopment and the Port of Seattle’s own study recommended that this property should not be in heavy industrial use any longer. We are more than happy to provide this study to OPCD. The Port’s own staff concluded that, “Speaking from the Seaport, it seems hard to think Pier 1 would be of much use to us. What container support activity we had going on at the CEM had to be removed because of neighborhood agreements and any similar use of Pier 1 would run into the same trouble.” The Port has killed any past rezone attempts by AnMarCo for this property due to the fact that, “Our real beef with the proposed change is based on their (AnMarCo’s) avenue for the re-zoning sets a bad precedent that could be emulated by other industrial property owners in the Duwamish MIC/SODO area. This wholistic review of Industrial lands is the appropriate time to study the true viability of the Pier 1 site.
 - AnMarCo offered to sell the property to the Port, and the Port has declined to purchase the property, even as part of the Terminal 5 project.

18-2 cont.

- The property was studied by the EIS completed for Elliott Bay Marina as a potential alternative location for a marina. Due to the north winds during high pressure aiming directly at this property, this location was rejected for a marina. AnMarCo discussed this property with Harley Marine for use as their headquarters/tug and barge storage. The wind issue also blocked this idea; Harley Marine instead decided to build its headquarters farther up the Duwamish in a more protected spot, near Spokane Street. Today, the property hosts a few barges that tie up to the decrepit docks that currently exist, but only for short periods of time.
- The property is a waterfront lot and much of it is located within the shoreline setback that cannot be developed. The difficulty of the property itself, plus the overlay of the shoreline zone that severely limits uses and development standards, is a significant problem in locating industrial uses on this property.
- Any jobs analysis that includes the Pier One property as a contributor in terms of jobs is faulty. The property has not created any jobs in 30 years. As stated, if the property remains industrially zoned, it will never be redeveloped, and it will never create jobs. Please ensure the jobs data that accompanies the EIS is honest about the jobs and can and cannot be created via complicated properties such as this one.
- The DEIS does not contemplate changes that would need to be made to the shoreline environments to achieve any of the proposed alternatives for properties in the shoreline. It is overwhelmingly difficult to develop anything in the shoreline environment. The Urban Industrial environment is notoriously restrictive in terms of uses and development regulations. Adding to this the other layers of regulations/regulators that may impact development in the shoreline/overwater environment—Corps of Engineers, Department of Ecology, Dept of Fish and Wildlife—it cannot be overstated exactly how difficult industrial development in the shoreline is to achieve.
- The DEIS must consider the negative environmental impacts that will occur if the property remains in the MIC/zoned industrial and continues to be undeveloped. Please note that even with the currently proposed changes to the industrial zone development standards, it will be impossible to develop this property into meaningful/real industrial use. The negative impacts of keeping this property as-is indefinitely have not been discussed or disclosed in the draft EIS. These negative impacts include, but are not limited to, the following:
 - Economic impacts including blight. As much as AnMarCo tries to keep a use on this property, the property includes a pier structure that dates back to 1905 (an old grain terminal) that is dangerous and falling down. Demolition or removal of this structure is expensive and will require extensive permitting just to remove, and so economic resources would be necessary to complete this. Without the ability to redevelop this property, the property will remain as-is, creating blight in the Alki neighborhood.

18-2 cont.

18-3

18-4

18-5

- Visual and aesthetic/view impacts. The property is on the other side of the visual buffer from the industrial area (Jack Block Park). Industrial use of this property, including its current use for crane storage, create significant visual and aesthetic impacts. In addition, Harbor Avenue SW is a designated SEPA view corridor. The impacts of remaining in industrial use will have a significant impact on this corridor. 18-6
- Environmental impacts. The property contains environmental contamination. Clean up of the contamination will not occur until/if the property is redeveloped. As a result, land use policies that result in no meaningful allowance for redevelopment will maintain the environmental status quo, keeping pollution in the ground close to Puget Sound. 18-7
- Land use impacts. It is inappropriate to locate industrial land on the outside of the designated industrial buffer (Jack Block Park). Creating an island of industrially-zoned property in the middle of residential and commercial properties create conflicts that should not exist. 18-8
- Shoreline/Fish/Natural Environment impacts. The existing over-water structure has impacted the shoreline environment in a negative manner since 1905. The structure will remain unless the property can be redeveloped. As a result, the structure will continue to cast shadows into fish habitat, and will continue to negatively impact the shoreline/natural habitat. This impact must be accounted for. 18-9
- Stormwater impacts. There is no stormwater infrastructure on the site, meaning much runoff occurs uncontrolled into Puget Sound. Without redevelopment, this impact will remain. This impact must be specifically stated and disclosed in the DEIS. 18-10

Again, we appreciate the opportunity to comment on the draft EIS, and we appreciate your careful consideration of our comments. We are more than happy to provide you with any additional information on the issues we have raised; we have files and files of documents related to this property in our work with it over the last 10 years.

Sincerely,

/s/

Jessie Clawson

Cc: Jim Blais, AnMarCo

Holmes, Jim

From: Abigail Pearl DeWeese <abigail.deweese@hcmp.com>
Sent: Tuesday, March 01, 2022 11:44 AM
To: PCD_Industry_And_Maritime_Strategy
Cc: Kevin Daniels; Ryan Durkan; Quirindongo, Rico; Wentlandt, Geoffrey; Holmes, Jim
Subject: First & Utah Industrial Lands DEIS Comments
Attachments: First and Utah Industrial Lands DEIS Comment Letter Final.pdf; Proposed I&I Boundary.pdf

CAUTION: External Email

Dear Jim and Geoff,

Please accept the attached comment letter from First & Utah Street Associates on the industrial lands DEIS. Also attached is a map showing graphically the requested expansion of the I&I zone boundaries. Please do not hesitate to contact us should you have any questions or need any clarifications. Thank you for your hard work on this important effort.

All the best,

Abbey

Abigail Pearl DeWeese

Hillis Clark Martin & Peterson P.S.

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FIRST AND UTAH STREET ASSOCIATES, LLC

2401 Utah Ave South, Suite 305
Seattle, WA 98134

March 1, 2022

Geoffrey Wentlandt, Planning Manager
Jim Holmes, Strategic Advisor
Seattle Office of Planning and Community Development
P.O. Box 94788
Seattle, WA 98124

Via email to PCD_Industry_and_Maritime@Seattle.gov

Dear Geoff and Jim,

Thank you for this opportunity to provide comment on the Industrial and Maritime Lands Strategy DEIS. First & Utah Street Associates, LLC (“First & Utah”) provides these comments as a longtime owner and community member in the SODO neighborhood, a vital part of the Duwamish Manufacturing and Industrial Center (“M/IC”). An original First & Utah partner is credited as having coined the name SODO, originally for “South of the Dome,” and we have a strong history of participation in efforts to revitalize the neighborhood for a range of uses complementary to the area’s industrial roots and function. We look forward to the next chapter for the neighborhood.

A. First & Utah Has Deep Roots in SODO

First & Utah is the proud legacy owner of the former Sears Roebuck & Co. catalog distribution building. We transformed the building with an industry-leading adaptive reuse project to convert the historic building into Starbucks Center, which has been the global corporate headquarters for Starbucks Corporation for more than two decades. The building contains approximately 1.4 million square feet of office space, as well as other uses including retail, food processing, warehousing, manufacturing and childcare. In addition to the Starbucks Center building, two parking garages, and the main surface parking lot (a separate development site), First & Utah owns several other nearby properties in “Industrial General” 1 and 2 zones, including the Home Depot parcel, and several lots on the west side of 1st Avenue South between South Lander Street and South Forest Street. These properties are all located within 0.4 miles of the SODO light rail station that will gain additional service with construction of the Ballard/West Seattle Sound Transit Link Light Rail extension. They are well-positioned for significant density for employment growth supported by transit and last-mile connections.

19-1

B. The City’s Preferred Alternative Should Support Legacy Businesses Near Light Rail Investments and Allow for Modern Industrial Uses with an Expanded and Modified Industry and Innovation Zone

The City has identified an “Industry and Innovation” (“I&I”) zone that would allow non-industrial uses, including office uses, as bonus development above a base FAR of standard industrial uses. First & Utah strongly supports this zone designation. It should be included in the City’s Preferred Alternative and

19-2

expanded to apply to all of First & Utah’s property as it could allow Starbucks to grow in place in our City and increase the quantity of living wage jobs and employment density near transit, consistent with the objectives of this industrial lands effort. This is also consistent with the goals of the I&I zone to encourage new development in multi-story buildings that accommodate industrial businesses mixed with other dense employment uses near transit stations. There are, however, several practical modifications to the potential development standards for this zone that should be incorporated in the proposal to increase its viability:

19-2 cont.

- **Height:** The maximum height limit should be increased to a minimum of 180’ to allow for innovative and sustainable mass timber construction types. Additional height is also appropriate because industrial manufacturing and laboratory uses often have taller floor to floor heights compared to traditional commercial buildings. Additional height for rooftop appurtenances supporting industrial uses or sustainability features should be allowed above this height limit.

19-3

- **FAR:** Maximum FAR achievable via the mixed development bonus program should be increased to at least 6-7 FAR to allow buildings to achieve the increased maximum height limit by stacking density to provide needed accompanying amenities. Further, the requirement of 0.5 FAR for industrial use should be retained along with the incentive system bonus ratio of 1:3, but all square footage in qualifying industrial uses should be FAR-exempt. Such a FAR exemption would further support the feasibility of future industrial uses. FAR should also be allowed to be combined and transferred across development sites and across City rights-of-way as part of a single, phased development through a modified major phased development process that would be allowed in this zone and applicable to projects greater than 200,000 gross square feet in size. Alternatively, the City should allow within-block TDR transfers or combined lot development techniques on I&I zoned properties to allow development capacity to be maximized in the most efficient manner.

19-4

- **Industrial Uses:** The expansive list of industrial uses in the current code should be used as the basis for uses qualifying for the mixed development bonus program. Reducing the list of qualifying uses or updating definitions to be more restrictive would limit the flexibility to locate modern industrial uses in the M/IC and undermine the goals of the I&I zone.

19-5

- **Ancillary Uses:** Instead of setting a bright-line rule at 30% of square footage, the City should set rules around ancillary uses that look at several factors like the actual function of spaces, use of technology, and the overall purpose of the business in a space, rather than just size of uses. A bright-line rule without flexible off-ramps will result in fewer innovative industrial uses locating in this zone and may not adequately support changes in industrial functions and technology over time.

19-6

- **Transportation:** The City should publish the Joint Director’s Rule contemplated by SMC 23.52.004.B. so that property owners can properly evaluate the available mitigation measures to help achieve the 51% SOV goal in the Duwamish M/IC and similar areas. The frontage landscaping and design requirements contemplated for the I&I zone like sidewalk and streetscape improvements encouraging pedestrian travel modes should qualify as applicable mitigation measures. Other qualifying measures should include last-mile corporate shuttle

19-7

service and additional bicycle infrastructure.

- **Design Review:** Retain the general exemption from design review in most industrial zones and extend this exemption to the I&I zone.

19-8

These modifications to development standards and available density should be incorporated into the Preferred Alternative and studied adequately in the Final EIS.

C. Specific Requested Map Changes

The Preferred Alternative should tailor the boundaries of the I&I zone to support and implement the objectives of the industrial lands effort. Accordingly, the Preferred Alternative zoning map should be amended to apply the I&I zone to all of First & Utah's property within a half mile of Light Rail. This would specifically mean expanding the zone from the extents shown in either Alternative 3 or Alternative 4 west to encompass the Starbucks Center building and garage, and south to encompass the Home Depot site and other properties along 1st Avenue South between S Lander Street on the north and S Forest Street on the south. Such expansion would allow First & Utah to redevelop its existing SODO properties to allow Starbucks to grow in place and provide critical living wage jobs and a variety of economic and social benefits, without compromising industrial land supply or creating adverse effects on industrial uses.

19-9

Thank you for this opportunity to provide comment. Please let us know if there were any points you would like to discuss further or if you have questions about implementation of these ideas. We would be happy to assist your work. On behalf of First & Utah, we look forward to the strong future that awaits the SODO community.

Sincerely,



Kevin Daniels

cc: Rico Quirindongo, OPCD
Ryan Durkan, HCMP
Abbey DeWeese, HCMP

Holmes, Jim

From: ffitch, Eric <ffitch.E@portseattle.org>
Sent: Wednesday, March 02, 2022 7:40 PM
To: Wentlandt, Geoffrey; Holmes, Jim; Persak, John
Cc: Dan McKisson; Terri Mast; Jordan Royer; Charles Costanzo; Jill Mackie (jill.mackie@vigor.net); Peter Tarabochia (ptarabochia@ebdg.com); Chad See (chadsee@freezerlongline.biz); Sarah Scherer; Wasserman, Eugene; Dave Gering (dgering@seattleindustry.org); Johan Hellman (johan.hellman@bnsf.com); Wolpa, Lindsay; Peter Schrappen
Subject: industrial and maritime stakeholder letter on DEIS
Attachments: Industrial and Maritime stakeholder letter to Mayor Harrell on Industrial and Maritime DEIS - Mar 2, 2022.pdf

CAUTION: External Email

Geoff, Jim, and John —Please see attached for a letter from the City’s industrial and maritime stakeholders on the Industrial and Maritime Strategy DEIS.

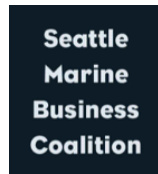
I hope it goes without saying that we appreciate your team’s work on this, your effort to communicate with us and ensure we had the chance to provide input, and the partnership overall.

Looking forward to future conversations, please feel free to contact us with any questions about the attached or any other DEIS issues.

-City Industrial and Maritime Stakeholders



Eric ffitch
Senior Government Relations Manager
Tel: (206) 787-3199 | Mobile: (206) 369-4968



March 2, 2022

The Honorable Bruce Harrell
Mayor, City of Seattle
600 4th Ave, 7th Floor
Seattle, WA 98104

Mayor Harrell:

As representatives of the City of Seattle’s industrial, maritime, and manufacturing sectors, we write to share our perspective on the Draft Environmental Impact Statement (EIS) for the Industrial and Maritime Strategy’s final recommendations.

Overall, we have strong consensus across our various sectors and organizations that **policies and regulations consistent with elements evaluated in Alternative 2 are the best choice for the long-term success and stability of the industrial, maritime, and manufacturing economy in Washington state.**

We came together in 2019 at the request of the prior Mayor, and the explicit charge of those that assembled in City Hall and in subsequent neighborhood group meetings was clear: “to develop a holistic and comprehensive approach to supporting the industrial and maritime sectors.” That is the focus with which we approach review of this DEIS.

20-1

Alternative 2—Future of Industry Limited: Alternative 2 retains current MIC boundaries. Alternative 2 would implement future of industry land use concepts with a greater emphasis on strengthening protections for core and legacy industrial and maritime activities. The proposed MML zone would cover approximately 90% of existing industrial lands. Application of the proposed II and UI zones would be limited in scope, covering approximately 10% of current industrial areas. II zoning would be focused on existing Industrial Commercial (IC) zones and areas within approximately 1/4 mile of light rail stations. UI zoning would be focused on existing Industrial Buffer (IB) zones and the existing Stadium Transition Area Overlay. There are no changes to housing allowances in Alternative 2.

20-1 cont.

In addition to our strong preference for an increase in the percentage of industrial jobs in the city, which as indicated will only occur with Alternative 2, our review generated a few other themes that we wanted to highlight in our comments.

First, the transportation section needs considerable improvement if it is to accurately account for the importance of freight mobility to the success of the industrial and maritime economy. Second, the DEIS makes clear the air quality, public health, and traffic safety choices that are inherent in siting incompatible development next to the City's Manufacturing/Industrial Centers (MICs), and we hope policymakers observe those trade-offs closely. And third, industrial jobs and their associated strong relative pay and the diversity of opportunity present in the MICs should be emphasized as this document is finalized, if it is intended to truly serve the aims of ensuring that everyone in our region has access to economic opportunity.

Transportation: The transportation section generated significant concern after our review, primarily because it seems to be almost entirely absent a freight focus that one might expect in a document about industrial and maritime sectors. A few specific thoughts:

20-2

- *Freight focus:* Freight corridors are vital, and many of us have served on or provided information and feedback to the Seattle Freight Advisory Board. What role did that Board have in developing the transportation section of this DEIS? Can the City engage the Freight Board as it works to finalize the DEIS, so it ensures that freight concerns are truly reflected in the final document?
- *Final connections/shoreline element:* While the document does contain some references to key freight corridors, such as 15th Avenue West and East Marginal Way, it does not address mobility concerns between the major truck streets and the connections to the driveways of businesses where equipment and workers are headed. In Ballard, where freight corridors give way to narrow streets that lead to the shoreline, giving industrial users more information and support for the final mile of their journey should be a focus of the transportation section of the DEIS.
- *Safety:* We respectfully observe that for purposes of the safety conversation in the DEIS, trucks are assumed to present the same safety concerns as cars. In other words, the final DEIS document must make a distinction between the safety issues posed by sight distance and turning radius conflicts between heavy freight trucks – like WB-67s—and bicycles and pedestrians, and those safety concerns inherent in car/pedestrian/bicycle conflict. They are not

the same, and we are concerned that the DEIS treats them as such. The difference between cars and trucks for safety must be emphasized in the final report.

20-2 cont.

Jobs: As noted in our introductory paragraphs, the entire goal of the Industrial and Maritime Strategy process convened by Mayor Durkan in 2019 was to promote the success of the businesses and workers that make their living in the City’s industrial areas. The introductory section of this EIS states:

“There are currently around 98,500 industrial jobs (2018) or about 15% of total jobs in the city—about two-thirds of these jobs are available with only a high school diploma, and over half of the jobs in the maritime sector are available to persons with no formal educational training. Average earnings per worker are over 70% of the Area Median Income (AMI) in the construction, aerospace/aviation, and logistics sectors, and a high number of jobs in logistics, maritime, and manufacturing sectors remain unionized and provide high quality benefits”

20-3

The report goes on to summarize the job impacts of the various alternatives and affirms that under Alternative 2 “the total number of jobs is expected to increase by 34,400 with 72% of that industrial in nature; the total share of industrial jobs in 2044 would increase from 55% in 2018 to 60% in 2044.” Whereas in Alternatives 3 and 4, the share of industrial jobs within the MICs decrease to 54 percent and 53 percent respectively. We therefore feel strongly that if the intent is to promote diversity of economic opportunity, as is represented by industrial jobs, the City must adopt policies and regulations that implement elements of Alternative 2.

Incompatible development: We entered this process with the strong belief residential development is incompatible with industrial development. The DEIS confirms our belief that the City must ensure a separation between residential and industrial development if the success of the industrial and maritime sector businesses is the goal. Incompatible development generates safety concerns, as residents interact with freight trucks. It generates environmental concerns, bringing new residents near industrial zones where we are already confronting environmental justice issues. And it generates one central question for us as we review this document: with so much of the City already zoned for residential development, why would we look to the two areas where it is prohibited—our MICs—to address housing supply and affordability issues? The final EIS must unequivocally affirm that increased density in current residential areas is preferable to bringing new residents into and alongside the Manufacturing Industrial Centers.

20-4

We thank you for your attention to our feedback and look forward to continued discussion with you and your Administration as you work to implement the findings of the EIS.

Sincerely,

BNSF Railway Company
Freezer Longline Coalition
ILWU Local 19
Inlandboatmen’s Union of the Pacific
Manufacturing Industrial Council
North Seattle Industrial Association
Pacific Merchant Shipping Association

Port of Seattle
Puget Sound Pilots
Seattle Marine Business Coalition
The Northwest Seaport Alliance
Transportation Institute
Vigor
Washington Maritime Federation

Holmes, Jim

From: Peggi Lewis Fu <peggi@naiopwa.org>
Sent: Wednesday, March 02, 2022 2:04 PM
To: PCD_Industry_And_Maritime_Strategy; Holmes, Jim; Wentlandt, Geoffrey
Cc: Lowe, Marco; Nelson, Sara; Strauss, Dan; Peggi Lewis Fu; natalie@nataliequick.com
Subject: NAIOP Washington Industrial Lands DEIS Comment Letter
Attachments: NAIOP Industrial Lands DEIS comment letter FINAL.pdf

CAUTION: External Email

Good afternoon. On behalf of NAIOP Washington State, the Commercial Real Estate Development Washington State (NAIOP) and our more than 1,000 members, we are writing to provide comments on the City of Seattle’s Industrial and Maritime Strategy Draft Environmental Impact Statement (DEIS); letter enclosed.

Please feel free to reach out if you have questions.

Peggi Lewis Fu | Executive Director
NAIOP Washington State
Hours: Mon-Fri | 7 am – 3 pm
P.O. Box 24183, Seattle, WA 98124
(206) 382-9121 (main) | **(206) 512-8915** (direct)

March 2, 2022

Geoff Wentlandt, Planning Manager
Jim Holmes, Strategic Advisor
Office of Planning and Community Development

Re: Seattle Industrial and Maritime Strategy DEIS Comment Letter

Dear Mr. Holmes and Mr. Wentlandt:

On behalf of NAIOP Washington State, the Commercial Real Estate Development Washington State (NAIOP) and our more than 1,000 members, we are writing to provide comments on the City of Seattle’s Industrial and Maritime Strategy Draft Environmental Impact Statement (DEIS).

We all agree that Seattle must continue to protect its valuable working waterfront along Elliott Bay and in Ballard’s Ship Canal. These are irreplaceable economic engines vital to our City and the broader industrial and maritime industries. That said, all 5,000 acres of Seattle’s industrial lands are not alike. New policy and zoning approaches must take into account these marked differences, as well as the hundreds of millions of dollars in tax-payer-funded light rail stations that are currently, and will be through ST3, sited within underutilized, non-waterfront industrial areas.

21-1

As such, we offer the following comments to the current Draft EIS to inform the analysis and preferred alternative in the Final Environmental Impact Statement (FEIS):

- The FEIS must accurately identify and describe existing conditions, particularly in SODO, in order to ascertain a clear baseline for existing industrial uses. This means acknowledging Port of Seattle and Boeing Field as separate, dedicated industrial uses, delineating between industrial and uses that are heavy commercial or commercial uses and acknowledging vacant or interim-use industrial buildings. Added together, this paints a much different and vastly more accurate picture of what is happening on the ground in industrially-zoned areas. With this in mind, the EIS also needs to more robustly study the no-action alternative.
- The FEIS must acknowledge that the current code-based definitions for industrial uses is outdated and therefore, drives solutions that do not currently reflect today’s industrial, maritime, and industrial-commercial markets. Using outdated definitions in the code will no doubt create recommendations that may not yield the intended result.
- The DEIS fails to address that many industrially-zoned areas in Seattle have few current industrial uses. Examples include:
 - Elliott Avenue Corridor: This area includes millions of square feet of office uses and hundreds of residential units, together with wineries, distilleries and other retail and medical services. It is also a high-capacity transit corridor.

21-2

21-3

- 15th Ave / Interbay Corridor: Similarly, this area still includes significant industrial zoning, which is hindering adding new housing near the Dravus rezoned area, which is along a high-capacity transit corridor. There is very little active industrial use in this area.
- Non-Waterfront Ballard / East Ballard: A large area east of 15th Ave W and north of Leary Way NW is zoned industrial, but has transitioned to breweries, office use, distilleries and other similar uses. There are also pockets of industrial west of 24th Ave NW and north of NW Market St.
- Non-Waterfront Fremont: Significant industrially-zoned areas of Fremont are devoted to office, retail and other uses.
- Non-Waterfront Eastlake: Remnant industrial zoning remains on Eastlake Avenue, even though there is no realistic prospect of industrial use in this area.
- Judkins Park: Significant industrially-zoned areas lie close to Judkins Park. These areas house a variety of uses, few of which are industrial. The prospect of future industrial use in this area is remote.
- SODO (North of Spokane St. and East of First Ave Corridor.): The 1st Avenue S. corridor in SODO has few industrial uses and includes millions of square feet cumulatively of office, retail, home improvement, entertainment and other commercial uses. The 4th Avenue S. corridor in SODO similarly includes mostly retail, fast food, office and other commercial uses.
- Georgetown: Portions of the heart of Georgetown are zoned industrial but have not housed industrial uses in decades and are unlikely to in the future.

21-4

- Many industrial areas lie within a walkshed of existing or future light rail walksheds and therefore represent candidate TOD areas. These areas, which represent hundreds of millions of dollars in taxpayer investment, include:
 - SODO Station
 - Stadium Station
 - Smith Cove Station
 - Dravus/Interbay Station
 - Ballard Station

21-5

As a result, hundreds of acres of industrial land in all the DEIS alternatives will be in 15 years within a ½ mi. walkshed of regional light rail stations. Most of these areas are not currently characterized by industrial use and are not likely to be so in 15 years. The DEIS does not sufficiently acknowledge or analyze the relationship of this future light rail service and the role that industrially-zoned – though not industrially-used – lands should play in the regional plan for transit-oriented development.

- We support continuing to not require design review in industrial areas, as design guidelines aren't well-suited to industrial development.
- The FEIS should study increased density for all I&I near current and future light rail stations. As proposed, the current Industry & Innovation density bonus is only for IG-zoned sites, not IC-zoned areas. The FEIS should also support and analyze higher density and heights for Industry & Innovation and Urban Industrial areas than the density and heights studied in the DEIS. In particular, height limits should be increased to at least 180' to allow for innovative and sustainable mass timber construction types.

21-6

21-7


- The new concept of limiting any future removal of land within a MIC or the BINMIC to every eight years is extremely onerous and ties the hands of future policy makers as Seattle continues to grow and evolve. This is a one-size-fits-all draconian approach that would have unintended consequences across the City. 21-8

- To achieve the desired mixed-use concept with light industrial and office/retail/housing, the permitted light industrial uses need to be broader to achieve essential flexibility and compatibility. 21-9

- The FEIS should explore more expansive options than Option 4. It should also:
 - Study all Urban Industrial lands with a residential allowance of Seattle Mixed Use zoning
 - Study Interbay and non-water-dependent Ballard lands within the BINMIC as Industry & Innovation
 - Study Interbay and non-water dependent Ballard lands within the BINMIC as Urban Industrial 21-10
 - Study adding all non-BINMIC Ballard lands as Seattle Mixed Use zoning
 - Study adding all non-BINMIC Ballard lands as Urban Industrial (with housing option)
 - Study adding land around Lake Union outside the BINMIC should be studied as (1) Industry & Innovation; (2) Urban Industrial (with housing option); and (3) Seattle Mixed.
 - Study the impact of removing non-industrial limitation caps in the Urban Industrial zones

In closure, we believe the current FEIS falls short of analyzing several key components necessary for a comprehensive study of Seattle’s industrial lands to be accurate and inform new zoning and land use codes. We sincerely hope this extensive feedback will be taken into consideration and appreciate the opportunity to provide these comments. Please feel free to reach out if you have questions. 21-11

Sincerely,


 Pegg Lewis Fu
 Executive Director
 NAIOP Washington State

cc: Marco Lowe, City of Seattle Mayor’s Office
 Council President Debora Juarez
 Council Member Dan Strauss
 Council Member Sara Nelson

Holmes, Jim

From: Dave Gering <dgering@seattleindustry.org>
Sent: Wednesday, March 02, 2022 4:54 PM
To: Wentlandt, Geoffrey; Holmes, Jim
Subject: forgot the attachment
Attachments: Mayor and OPCD re industry .pdf

CAUTION: External Email

Holmes, Jim

From: Dave Gering <dgering@seattleindustry.org>
Sent: Wednesday, March 02, 2022 4:45 PM
To: Harrell, Bruce; Quirindongo, Rico
Cc: Harrell, Monisha; Burgess, Tim; Tarleton, Gael; Holmes, Jim
Subject: Mayor Industry and Seattle Schools
Attachments: Mayor and OPCD re industry .pdf; Mayor Durkan .jpg; Final Ad_.pdf

CAUTION: External Email

Dear Mayor Harrell and Team:

DEIS for industrial strategies presents an opportunity for the city to build on success of an industrial career learning initiative already in place and ready to grow in the Seattle Public Schools. PDF copy of the letter to the Mayor and Rico Quirindongo. Photo attached with Mayor Durkan along with full-page ad in the Times highlighting success of students at RBHS.

22-1

Happy to answer questions.



Dave Gering, Executive Director
Manufacturing Industrial Council of Seattle



MANUFACTURING INDUSTRIAL COUNCIL

March 2, 2022

Mayor Bruce Harrell
City of Seattle
Seattle, WA.

RE: Draft Environmental Impact Statement for
Seattle Industrial and Maritime Strategy

Dear Mayor Harrell:

The Manufacturing Industrial Council of Seattle requests a meeting with you or your staff team regarding the opportunity to incorporate the Seattle Public Schools into the Seattle Industrial Maritime Strategy. For this reason, we are including you in our input letter to departmental staff regarding the Draft Environmental Impact Statement for the strategy.

22-2

We agree with the input letters submitted by the Seattle Freight Advisory Board and the Port of Seattle. Our specific concerns are with development Alternatives 3 and 4. These alternatives would result in significant increases in residential and worker populations.

In our view, the DEIS fails to account for the following:

- How will the aging infrastructure in these industrial areas be upgraded to accommodate increased truck and rail traffic?
- How will the same aging infrastructure respond in an earthquake of magnitude 7 or higher given the liquefaction potential?
- How much earthquake damage will occur in evacuation routes and emergency response facilities?
- How quickly can functional infrastructure be restored?

22-3

The DEIS also needs to more fully address climate concerns and these additional issues.

- Increased noise and lighting cannot be fully mitigated in industrial zones. This will conflict with residential uses resulting in complaints and severe restrictions on industrial users.
- Increased traffic will result in increased non-point source stormwater pollution from roadways with no mitigation offered in the DEIS.
- Industrial soil cleanup levels cannot be applied in areas near residential and other vulnerable populations. Consequently, parcels cleaned up to industrial standards must have a wide buffer zone and be protected from upzoning in the future.

22-4

22-5

22-6

While these concerns can likely be managed at the departmental level, it appears a leadership intervention is necessary to achieve stakeholder goals for more equitable access for more Seattle residents to high-wage industrial careers.

22-7

MIC efforts to increase opportunities for career learning began in 2007. In 2012, that community-based effort resulted in the rollout of the Core Plus career learning initiative now available at 70 schools across the state with instruction programs for nearly 5,000 students. Rainier Beach High School in Seattle was one of the 2012 launch sites and the RBHS “skill center” effort continues today.

Mayor Bruce Harrell
March 2, 2022
Page Two

Given the depth of this commitment by our members, we were excited to learn about the priority placed on career learning in the city's industrial strategic initiative. However, throughout the initiative, we were unable to interest city staff in learning more about Core Plus. This frustration was compounded when we later learned city staff assigned to the strategic effort was focused on a project to create a maritime-themed high school in the Highline Public Schools.

The Highline project is a worthy effort. However, we do not understand why it was or is appropriate for city staff to expend time on the Highline schools while short changing students in the Seattle schools.

22-7 cont.

We have worked successfully with the Seattle schools for the past 15 years. We know when and why patience is required. We also know the rewards available when such efforts succeed. Mayor Durkan had an opportunity to see this success first hand with Core Plus graduates of RBHS at a "Family-Wage" summit with industrial stakeholders in 2018. Photos attached.

As events turned out, we were not able to keep Mayor Durkan personally engaged in the Seattle school effort. Perhaps you and your team can pick up the baton.

Sincerely,



Dave Gering, Executive Director
Manufacturing Industrial Council of Seattle

cc: Rico Quirindongo, Interim Director
Office of Planning and Community Development

Holmes, Jim

From: Ginny Gilder <ginny@gilder4growth.com>
Sent: Wednesday, March 09, 2022 11:15 AM
To: Holmes, Jim
Subject: Industrial & Maritime Strategy DEIS Comment Letter
Attachments: Industrial Lands DEIS Comment Letter (3-2-22).pdf

CAUTION: External Email

Dear Mr. Holmes,

I am writing to endorse the comments in the attached letter regarding the City’s Industrial Lands DEIS. There are many concerns raised in the attachment that need to be addressed, and I hope the City decides to do so. 23-1

Ginny Gilder
GILDER OFFICE FOR GROWTH, LLC
FORCE 10 ENTERPRISES



From: Jack McCullough <jack@mhseattle.com>
Sent: Wednesday, March 2, 2022 10:33 AM
To: Jack McCullough <jack@mhseattle.com>
Subject: Industrial Lands DEIS Comment Letter

Here is the final letter, submitted today.

Jack

John C. McCullough
Attorney at Law
MCCULLOUGH HILL LEARY, PS
701 Fifth Avenue, Suite 6600
Seattle, Washington 98104
Tel: 206.812.3388
Fax: 206.812.3389
www.mhseattle.com

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Holmes, Jim

From: Bob Gillespie <gillespie1000@msn.com>
Sent: Monday, February 28, 2022 2:37 PM
To: Holmes, Jim
Subject: Comment Letter-DEIS
Attachments: 2-28-22 Jim Holmes City of Seattle.pdf

CAUTION: External Email

Mr. Holmes, attached for your review is our comment letter on the Industrial and Maritime Strategy DEIS. I have also mailed a hard copy, but wanted to ensure our comments made it in the record by the deadline.

Thank you, in advance, for considering out thoughts.

Bob Gillespie

Lander Street Partners LLC
206-719-6234



February 28, 2022

Mr. Jim Holmes - City of Seattle
Office of Planning and Community Development
P.O. Box 94788
Seattle, Washington 98124-94788

OFFICE OF PLANNING &
COMMUNITY DEVELOPMENT
MAR 03 2022
RECEIVED

Re: Industrial and Maritime Strategy D.E.I.S.

Dear Mr. Holmes:

Our partnership owns commercial properties across from the SODO light rail station. Proposals in the city's Draft Environmental Impact Statement (DEIS) negatively impact the future of our land, buildings and tenants. As such, we have added our support to the Seattle Industrial Coalition and the formal comments submitted to you on 2/27/22 by Attorney Jack McCullough.

Mr. Holmes, the industrial emperor has no clothes. Such uses have been leaving the district at the rate of one million square feet a year for more than two decades. A 2007 "downzone" did nothing to stop this outmigration. Councilmember Sally Clark said at the time the city must "maintain a critical mass of industrial manufacturing within the city." It didn't work then. It won't work now, especially with land use restrictions that are even more draconian. In 20 years, despite a focus on working-class jobs, you have seen the disappearance of hundreds of what were once considered desired uses. Fabricators, manufacturers of copper pipe, boilers, winches, steel, cranes and other heavy equipment have moved south and east of Seattle. Institutional investors will acquire land in SODO, because time is real estate's best friend and the investment will grow within their billion-dollar portfolios. But, they are not going to construct facilities for truck and trailer parking or large scale manufacturing.

24-1

Even on a much smaller scale, economic decisions are not being made on the basis of blue collar jobs and industry. We are such a case. We don't spend hundreds of millions of dollars like this region's largest and most successful development companies. But before we open our checkbook, we follow a similar process: review the market for credit tenants; decide what space they might like; assess the cost of rebuilding our properties to meet their needs; agree on how long we must keep them to recover our investment with a return; and commit to the inherent risk. I see nothing in the proposed combinations of floor area ratios, various workspaces, housing and industrial uses that would even come close to encouraging us to invest in a redeveloped layout for our

properties. In fact, one of the designs is almost amusing in its suggestion; with one local owner calling it a proposal to serve the "rebirth of the New England textile industry", with dormitory housing for workers wearing uniforms.

A decade ago, our partnership lost 27 percent of our tenant base when our only industrial customer relocated to Kent. They left because the access was better, rent was lower, infrastructure was newer and the yard space was in abundance. Not one company wanted to lease our vacant space with three-phase power, high doors, winches and compressors. So, we divided it among four different, allowed, commercial uses. Since 2000, no broker nor company representative has ever approached us with an industrial tenant. The bulk of the property ownership in the district is accounted for in smaller partnerships like ours and I can bet that not a one looks for the 1940's employment base as the future for their properties.

Non-industrial uses are about 33 percent of the district and will continue to grow. Please see Mr. McCullough's letter in that regard. Restaurants, coffee shops, tool sales, barbecue joints, safety equipment sales, cannabis growers, offices, clothing stores, outdoor equipment sales, trapeze instruction, car dealerships, unauthorized residences, homeless encampments and interim uses will become the tenants du jour.

24-1

Opening this area to larger-scale, coordinated, development is supported by the city's comprehensive plan – EDG3 "Encourage a business climate that supports new investment, job creation..." Additionally, the city proposals do not encourage transit-oriented development, which Sound Transit's new CEO strongly supports. If the city truly cares about job equity and growth, it should honestly admit that industrial uses are gone and consider a mixed-use approach for the district.

Or, you can pass these proposals - which stifle necessary or visionary growth of job, retail and housing opportunities in our area - onto Mayor Bruce Harrell. He has already shown a willingness to strike out with bold proposals for the homeless. Should we not wait until he has time to consider the opportunities that exist within SODO before closing out his options and restricting the district from new investment?

Thank you, in advance, for considering these comments in your review process.

Very truly yours,



Robert L. Gillespie
Lander Street Partners, LLC

Transmitted to Jim.Holmes@Seattle.gov

Lander Street Partners, LLC
P.O. Box 129
Bellevue, Washington 98009-0129

OFFICE OF PLANNING &
COMMUNITY DEVELOPMENT

MAR 02 2022

RECEIVED

Mr. Jim Holmes - City of Seattle
Office of Planning and Community Development
P.O. Box 94788
Seattle, Washington 98124-94788

SEATTLE WA 980
28 FEB 2022 PM 7 L



98124-708888



Holmes, Jim

From: Steve Gillespie <steve.gillespie@foster.com>
Sent: Wednesday, March 02, 2022 3:01 PM
To: PCD_Industry_And_Maritime_Strategy
Cc: Wentlandt, Geoffrey
Subject: Public Comment on Seattle Industrial & Maritime Strategy DEIS

CAUTION: External Email

Hello, Geoff and Jim. Thank you for the extended opportunity to provide public comment regarding the DEIS for the Industrial Lands rezone effort. The DEIS represents a massive effort on the part of your team and consultants, and we appreciate the extra time that enabled us to begin to digest it. We represent Hess Callahan Grey, who develop and manage several properties in Fremont’s industrial areas, including several that are part of the “Silicon Canal” tech hub.

25-1

Silicon Canal has grown into a major employer in a neighborhood with relatively dense housing opportunities, good non-motorized transportation facilities, and decent public transit, all near the UW and its world-class computer science and technology programs. It is an employment hub that any other city would covet, and the City should protect it. To ensure its continuing success, land use regulations governing the area should be handled with care, not incidentally altered as a minor subarea of Seattle’s 6,900 acres of industrially zoned land.

25-2

Although the EIS acknowledges the existence of the Silicon Canal, it does not meaningfully analyze the impacts of the proposal on its continued existence and future growth. Rather, it lumps that part of Fremont together with Wallingford, the University of Washington MIO, and Ballard as the “Ballard Subarea.” The discussion of the Ballard subarea properly focuses on actual Ballard, but these other neighborhoods are unique and will endure unique environmental impacts that must be studied.

If the industrial zoning governing many Silicon Canal structures is to be tinkered with, it should be as part of a stand-alone planning effort that meaningfully analyzes the impacts to the existing tech uses that co-exist with current industrial uses, as well as the potential impacts for future co-existence of these two important employment sectors. For example, several Silicon Canal properties will be zoned Industry/Innovation under all three action alternatives, but it is not at all clear that the market will support the light industrial uses that the new zone will require in new buildings. If such constraints jeopardize the ability of tech companies to meet their space needs within the hub, the economic impacts to the region could be huge, and also create knock-on environmental impacts that the EIS should study.

25-3

This lack of analysis of impacts to Silicon Canal is likely repeated in several unique areas within Seattle’s industrial zones, and may be the inevitable result of the enormous effort OPCD has undertaken. It is not clear that any single document could meaningfully analyze the environmental impacts of a rezone of nearly 7,000 acres of land stretching from Tukwila to Ballard.

More broadly, despite the obvious time and effort that went into the DEIS, it nevertheless suffers from several foundational flaws, beginning with an ill-defined proposal. Other than to advance the thirteen general and sometimes contradictory goals listed on Ex. 2.1-2, the DEIS does not set forth any specific proposed action. The document lacks the typical purpose and needs statement required by SMC 25.05.440.C, and OPCD has not published a SEPA review draft ordinance for the public to digest when evaluating the analysis of environmental impacts. Without a clear proposed action, it is impossible to identify “reasonable alternatives” to

25-4

that proposed action, or “actions that could feasibly attain or approximate a proposal’s objectives, but at a lower environmental cost or decreased level of environmental degradation.” SMC 25.05.440.D.1. 25-4 cont.

As a result, the selection of alternatives does not highlight the environmental impacts of any proposed action. Of the potentially dozens of regulatory prescriptions that could serve the thirteen goals in different ways, the action alternatives really study only one. All three action alternatives study the same zones, so the difference between the three alternatives is minor, with only slight variations regarding the geographic location of each new zone. Why did the DEIS not study different zones? Instead of, say, an II zone that requires light industrial or manufacturing in every building, what impacts would allowing stand-alone office create? What about a zone that allows bigger restaurants? We don’t know. 25-5

This selection of alternatives limits the choice of reasonable alternatives Council can consider. Council could not adopt a rezone package that changes the particulars of any of the zones without risking impacts that were not studied in the EIS.

In addition, the proposal includes new size-of-use limits for the UI zones that will replace Industrial Buffer, but the DEIS does not appear to analyze whether the market will support any development under such size limits. For example, the proposal will reduce the maximum size limit for office use in the IB zone by 85%: from the current 100,000 sq. ft. in IB to 15,000 sq. ft. in UI. Lodging and Medical Service uses will be reduced by 2/3, from 75,000 sq. ft. to 25,000 sq. ft. Restaurants, currently unlimited in size, will be limited to 3,000 sq. ft. Without a market analysis of whether such uses can operate profitably while complying with these new size limits, the DEIS cannot anticipate what impacts the proposal will create on the built environment. 25-6

Finally, the DEIS does not meaningfully analyze the interplay between the action alternatives and the Shoreline Master Program. In some places the action alternatives will have no effect because the changes contradict the SMP, but other than acknowledging that the eventual proposal will not affect the SMP and that the SMP controls in a conflict, the DEIS does not analyze any impacts of the contradiction, which makes it difficult to anticipate what will actually be built under new regulations. For example, the proposal has the potential to allow 160’ buildings outside of the Shoreline District but step down to 35’ in the Shoreline District—sometimes within a single lot. But such impacts are not meaningfully studied in the DEIS. 25-7

Without a clear proposal, analysis of environmental impacts is bound to be legally inadequate and reasonable alternatives cannot be identified. Without a recognition of the unique impacts of the several unique areas zoned industrial, such as Silicon Canal, the DEIS cannot accurately identify and analyze the probable significant adverse environmental impacts of the proposed action. In short, the DEIS is inadequate to serve its purpose to inform City decisions about the impacts of the proposal and reasonable alternatives to that proposal. 25-8

Thank you again for the opportunity to submit public comment, and we look forward to working with OPCD on this.

Steve

Steve Gillespie (he/him) | FOSTER GARVEY PC | D: 206-447-5942 | C: 206-446-6784

Holmes, Jim

From: Erin Goodman <erin@sodoseattle.org>
Sent: Wednesday, February 16, 2022 12:50 PM
To: PCD_Industry_And_Maritime_Strategy
Subject: Seattle Industrial & Maritime Strategy DEIS Comments
Attachments: Seattle Industrial and Maritime DEIS Comments SODO BIA 2.16.22.docx

CAUTION: External Email

Attached you find the SODO BIA's comments of the Industry and Maritime DEIS. We look forward to these being addressed as the process moves towards the final EIS.

Thanks,

Erin

Erin Goodman
Executive Director

SODO Business Improvement Area

270 S Hanford St, Suite 112, Seattle, WA 98134

T 206.294.3285 | **F** 206.294.3328 | **C** 206.981.9877

erin@sodoseattle.org | sodoseattle.org



TECHNICAL MEMORANDUM

Subject: Seattle Industrial & Maritime Strategy DEIS

Date: February 15, 2022

The purpose of this technical memorandum is to provide preliminary comments on the transportation and traffic analysis in the Seattle Industrial & Maritime Strategy DEIS. The comments will focus on the Greater Duwamish Maritime and Industrial Center (MIC).

3.10 Transportation

The transportation chapter is missing the subject of freight including trucks and rail. The heading “Auto & Freight” only addresses vehicular traffic volumes and not conditions for freight movement or facilities. The freight subject as a stand-alone subject heading is included in an environmental document whenever the study area overlaps with freight facilities such as truck streets and rail lines. The “Freight” subject should cover existing conditions, future no action, and future action conditions of each alternative.

26-1

Request: Add the “Freight” subject as a subheading, with appropriate analysis, to the transportation chapter. Include truck and rail existing conditions, future no action, and future action conditions. Include relevant basis for analysis from the City of Seattle *Freight Master Plan*. Include potential future operating policies on rail lines.

3.10.1 Data and Methods

The traffic analysis is missing daytime conditions in the MIC. Daytime operating conditions are critical to commercial and industrial land uses. It is an error in methodology to ignore daytime conditions within the manufacturing and industrial areas. The mid-day traffic peak should be disclosed. The DEIS presents an analysis of the PM peak hour transportation conditions in 2044. It is acknowledged within the DEIS that during PM peak hour conditions at or near capacity there is little change to the PM peak hour and that peak hour spreading occurs. The DEIS does not present daily trips and traffic generated by the alternatives using absolute numbers which would disclose the incremental impacts of daytime operating conditions.

26-2

Request: The methodology should present daily trips generated by the alternatives and the subsequent mode split in absolute numbers so that the reader can better understand the potential increases in traffic throughout the day. The absolute number of trips should be followed by presenting in figures the changes in daily and PM peak hour traffic on streets in the study area for each alternative. In addition, the DEIS should present the extent of peak hour spreading and show the daytime peak hour.

3.10 Transportation Impacts

Travel Time Level of Service

The thresholds for travel time level of service are shown in Exhibit 3.10-2. Operating conditions for each threshold should be supplemented by a description of each level of service so that the average reader can understand the conditions represented by each level of service.

26-3

Request: Prepare text describing operating conditions for each level of service. For example, LOS F results in travel times longer than 3 times the free-flow speed, reflecting operating conditions with long queues at signals, waiting through more than one signal, queues behind vehicles waiting to make turns, impacts to intersecting streets when vehicle queues back up across the intersecting street.

PM Peak Hour Analysis

The PM peak hour analysis results in approximately the same condition for each alternative. The PM peak hour, which is acknowledged as at capacity does not disclose the differences in traffic impacts by alternative because daytime operating conditions are missing.

Request: Prepare a table of trips generated by alternative and the distribution to each mode using absolute numbers (not percentages). The assumed number of trips distributed the pedestrian, bicycle, and transit should be disclosed and the resulting daily vehicular traffic volumes.

26-4

Request: Prepare analysis and disclose the impact of daily traffic generated by alternative, midday conditions, and peak hour spreading for the maritime and industrial land uses. These land uses need a functioning street system and the more hours of the day at LOS F means future hours in which to efficiently conduct business.

Impacts with rail operations

Rail operations are a significant mode of transportation in the Greater Duwamish MIC, affecting all other modes of transportation and safety. A freight section of the DEIS should include rail, addressing freight and passenger rail, and describing rail operations for existing conditions, future no action, and the action alternatives.

The analysis is missing conditions when rail lines block streets and the relative conditions for existing conditions and each alternative. In addition, with peak hour spreading will there be more hours of the day with LOS F conditions at the same time a train is blocking a street.

26-5

Future No Action should disclose the status of Holgate being removed for general-purpose traffic by the railroad. Such an outcome would dramatically change the future No Action condition.

Request: present rail operating conditions, rail operating policies, frequency, and length of time streets are blocked during daytime and PM peak hour conditions. Present existing conditions data for queuing and delays when streets are blocked, present future No Action conditions that could occur through railroad action and assess future conditions for each alternative.

Interim conditions and risk in analysis

The no-impact conclusion appears to be the result of an embedded assumption that for Alternatives 3 and 4, with the relatively high increase in employment, those employees are arriving by transit, walking, and biking. That model assumption should be disclosed. The assumption may be fine within ¼ to ½ mile of transit stations, but there is an element of risk – if transit is not feasible for the employees or if the types of businesses that occupy the new land use designations near stations are not able to achieve mode split goals or transportation demand management (TDM) goals due to their business operations.

26-6

The analysis is in the year 2044 and assumes full buildout of the transportation system - SDOT projects *and* Sound Transit Phase 3. Land-use changes and the subsequent development can occur much faster and be in place much sooner than Sound Transit can complete the projects in Phase 3. The MICs could be impacted by the traffic generated from the land-use changes for approximately 15 years in advance of the transit facilities being in place.

Request: Using the table of daily traffic impacts discuss relevant conditions before full buildout of the 2044 transportation system and the relative impacts that could occur.

The mode split assumptions may or may not recognize the non-typical commute patterns of commercial and industrial employees in terms of working hours and origins and destinations.

Request: Provide existing conditions information on various businesses in the Greater Duwamish MIC and their typical working hours for employees. Acknowledge the unique challenges of using transit for commercial and industrial businesses in the MICs in achieving the mode split and transit ridership forecast.

Safety

Businesses in the Greater Duwamish MIC report that one reason employees are not using transit is their concern for personal safety. In addition, employees' hours in commercial and industrial areas are outside of the typical 8 a.m. to 5 p.m. hours putting transit riders more often in a dark environment with little other activity providing eyes on the street that provide an element of personal safety.

26-7

Request: Add personal safety for transit riders to the safety section. Assess conditions relative to personal safety such as walking conditions, lighting, crime rates, distances between transit stops and destinations, etc.

Parking

Parking demand, impacts, and mitigation analysis is the standard approach to an EIS but should be modified for analysis in the MIC. This approach is an evaluation of new demand generated by the proposed land use on the existing parking supply. The analysis is qualitative, which limits the extent to which conclusions can be made. The City acknowledged that many streets in industrial lands are without definition of curbs or parking, making an inventory of parking difficult and therefore difficult to conclude the relative demand to inventory.

26-8

The EIS approach to parking does not address that there is a need for parking with changes in land use, except that the EIS text acknowledges that street frontages would be improved with new development. Industrial and manufacturing areas have unique demands for parking and access to facilities.

26-8
cont.

Request: Acknowledge within the EIS the limitations of a qualitative parking analysis. Present and acknowledge the need for parking along street frontages and missing a defined curb based on changes in land use.

Equity

The equity analysis is strictly an analysis of whether each of the alternatives, as evaluated for each of the elements of the environment will have an impact on lower-income and people of color. The analysis should address the opportunity to advance equity by the well-paying jobs in an industrial area.

26-9

Request: Include the subject of the quality of employment and access to that employment for commercial and industrial land uses by alternative.

3.10.3 Transportation Mitigation

On pages 3-419 (pdf page 576) transportation mitigation is described in the call-out box as, “Given the programmatic nature of this study, this EIS simply lists the types of projects that could be considered to mitigate potential impacts of the proposed alternatives.” The text on the same page states, “This section identifies a range of potential mitigation strategies that could be implemented to help reduce the severity of the adverse impacts of the Action Alternatives identified in the previous section.” These statements are very general and not particularly tangible to the average person attempting to understand the mitigation, except that Seattle staff said the purpose is to guide policy decisions.

26-10

On pages 3-419 (pdf page 576) the *Incorporated Plan Features* section lists three approaches to development regulations for the new land-use concepts.

1. “Standards for pedestrian and cyclist-oriented frontage improvements (sidewalks, pedestrian lighting, street trees, etc.)—Industry & Innovation and Urban Industrial”.

26-11

Request: Provide text that acknowledges that these standards need to be developed to ensure functionality for the primary uses – industrial and maritime. There is risk in approaching the standard primarily for the pedestrian, cyclists, and landscaping, recognizing that these elements would not be ignored as select components of the street system.

2. "Vehicle parking maximums and strong commute trip reduction program requirements— Industry & Innovation" This is fine near stations due to the higher density and assumed characteristics of the employees (able to take transit to work and encouraged to take transit to work). It is important to recognize the unique parking needs of industrial land use and not assume that all parking supply is a negative impact relative to trip reduction policy.

26-12

Request: Provide text that acknowledges the parking and vehicular curbside access needs for commercial and industrial land uses.

3. “Proximity to a light rail station—Industry & Innovation” It is unclear what is meant by this third bullet.

Request: Provide text adding clarity to the intent of this bullet.

The “Regulations and Commitments” section addresses as mitigation, in the following order, these programmatic mitigations:

- Transportation System Management and Operations (TSMO)
- Travel Demand Management
- Pedestrian and Bicycle System Improvements
- Parking Strategies
- Other Potential Mitigation Measures

26-13

The first two and fourth are a part of street operations and management of the system. These items are fine, however, not mitigation or improvements of the street infrastructure unless the TSMO mitigation identifies the infrastructure needed to improve TSMO.

The fifth bullet is where street infrastructure improvements are identified (page 3-424, pdf page 581). There are no mitigation measures within the Greater Duwamish MIC other than programmatic and operational. There are no mitigation measures because the PM peak hour analysis shows no impact relative to the 2044 No Action alternative.

Request: Prepare text that acknowledges the deteriorating conditions in the 2044 No Action alternative and impact on land uses in the MIC. Described programmed projects that would mitigate future No Action conditions including PM peak hour spreading, daytime peak conditions, and conditions with rail operations.

Existing conditions were improved with the temporary traffic signal at Forrest and 4th Avenue South during the Lander Street over-crossing construction. Local businesses report that traffic and back-ups are a lot worse since the signal was removed. The back-ups block access to businesses.

Request: Include the temporary traffic signal at Forrest and 4th Avenue South as a temporary improvement to existing conditions that could be included in mitigation relevant to 2044 No Action and Action alternatives.

26-14

Personal safety for transit riders is requested in the analysis of impacts. Following this analysis, identification of improvements for the personal safety of transit riders should be added to the mitigation section as a strategy to achieve transit ridership forecasts.

Request: Add a mitigation measure identifying strategies to improve the personal safety of transit riders.

Conclusion

The Seattle Industrial & Maritime Strategy DEIS is a very clean document and the clarity of what is presented is appreciated. The approach used in the is DEIS is a very standard approach for average land use mixes throughout the urban area. The comments and requests for additional methodology, data, analysis of impacts, and mitigation are based on the missing information relative to the unique needs of commercial and industrial land uses in the Greater Duwamish MIC.

26-15

From: Erin Goodman <erin@sodoseattle.org>
Sent: Monday, January 24, 2022 10:37 AM
To: Wentlandt, Geoffrey <Geoffrey.Wentlandt@seattle.gov>; Holmes, Jim <Jim.Holmes@seattle.gov>
Subject: Questions on DEIS

CAUTION: External Email

We are working to prepare our formal response to the DEIS, but have noticed an omission in the DEIS that I am hoping you can assist with.

The DEIS presents an analysis of the PM peak hour transportation conditions in 2044. The DEIS also acknowledges that during PM peak hour conditions at or near capacity there is little change to the PM peak hour and that peak hour spreading occurs. The DEIS does not present daily trips and traffic generated by the alternatives using absolute numbers. Daytime street operating conditions are critical commercial and industrial land uses. It is an error in methodology to ignore daytime conditions within the manufacturing and industrial areas.

26-16

The methodology should present daily trips generated by the alternatives and the subsequent mode split in absolute numbers so that the reader can better understand the potential increases in traffic throughout the day. These absolute numbers should be followed by presenting in figures the changes in daily and PM peak hour traffic on streets in the study area. In addition, the DEIS should present the extent of peak hour spreading.

Are you able to supply these numbers and figures so that we can properly respond to the DEIS?

THanks,

Erin
Erin Goodman
Executive Director

SODO Business Improvement Area
270 S Hanford St, Suite 112, Seattle, WA 98134
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Business Improvement Area
Advocating for a Safe, Clean & Moving SODO

Holmes, Jim

From: Colleen Horn <colleenhorn@makassets.com>
Sent: Wednesday, March 02, 2022 11:24 AM
To: PCD_Industry_And_Maritime_Strategy; Wentlandt, Geoffrey; Holmes, Jim
Subject: Industrial and Maritime Strategy DEIS Comments
Attachments: 2022.3.2 MAK DEIS comments_Final.pdf

CAUTION: External Email

Good morning,

Please find attached MAK's comments on the City of Seattle's Draft Environmental Impact Statement for its Industrial and Maritime Strategy Report. We look forward to continuing to work with the City on these very important plans.

All the best,

Colleen Horn
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Neither MAK Management LLC nor its employees or representatives are licensed real estate professionals. MAK Management LLC only serves certain family owned entities and properties and is not available to manage, purchase or sell properties on behalf of third parties.



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March 2, 2022

Via email: PCD_Industry_And_Maritime_Strategy@seattle.gov.

Seattle OPCD
Attn: Geoffrey Wentlandt & Jim Holmes
PO Box 94788
Seattle, WA 98124-94788

RE: Seattle Industrial & Maritime Strategy Draft Environmental Impact Statement

City of Seattle, Office of Planning and Community Development:

Thank you for the opportunity to comment on the Seattle Industrial & Maritime Strategy Draft EIS. MAK is a local family-owned business that owns several properties in Seattle's industrial zones in the Ballard/Interbay/Magnolia areas. MAK's business plan is to improve existing in-city industrial buildings with a long-term investment horizon and a neighborhood improvement focus, to provide excellent, modern spaces for small to medium sized light industrial businesses. While MAK has been able to create opportunities for industrial uses like breweries in Ballard, MAK has been challenged by restrictive zoning and inflexible building code regulations in its efforts to redevelop new and existing structures to modern, affordable spaces. We look forward to working with the City to modernize Seattle's industrial lands policies.

27-1

MAK has the following general comments to the DEIS, followed by additional property-specific comments. In addition, enclosed as Appendix A are additional comments on the DEIS developed in consultation with our counsel.

General Comments

DEVELOPMENT STANDARDS

- The DEIS is inadequate because the specific Development Standards have not been proposed. The impacts from the proposed action cannot be meaningfully assessed until the City develops the specific development standards that will implement the new zones. MAK is concerned that the proposed Development Standards, as currently written, will effectively bar non-industrial uses due to level of industrial required to achieve non industrial uses, and due to low sub-limits on ancillary uses. This is especially true for smaller lots which predominate large portions of the north

27-2

BINMIC. UI and II should be more flexible to encourage certain non-industrial uses that do not create conflicts with industrial uses.

26-2 cont.

- MAK notes that there was no economic analysis completed as part of this DEIS that tests feasibility of or provides examples of the new development standards. The DEIS can't assess whether the proposal will meet the proposals redevelopment objectives without a feasibility analysis. Based on the information available we have significant concerns that proposal will not provide sufficient flexibility needed to finance and develop new projects in the Study Area. Analysis should show, for example, whether the 30% ratio is enough for industrial development, and if not, what percentage or FAR would be required to facilitate the construction of a mixed-use industrial building. This analysis should be completed for various sub-areas around the City, as economics in Ballard, Interbay, Magnolia, and SODO may be different.

27-3

- MAK believes uses such as office should be permitted outright to allow for "stacking" of uses to achieve density and FAR desired. In certain locations, housing, like expanded caretakers quarters could be further beneficial to "stacking"/density in new industrial development (as shown in alternative 4). Where appropriate, mixing of uses will make for a modern industrial flex which is a fit for urban locations like East Ballard north of Leary, east of 15th, south of Market and west of 8th though not a fit for industrial lands south of Leary or other maritime concentrated areas in the BINMIC. Mixed or stacked use also provides more cohesive transition to adjacent residential uses, especially where IB is currently located.

27-4

- MAK suggests allowance for scenarios where a brewery/distillery can have ancillary tasting room/tap room/restaurant space that is adjacent or near the brewery/distillery but may be on a separate parcel. Ancillary use regulations should not discourage these configurations. MAK suggests using a linear distance or an area boundary. As an example, and for consideration when drafting Development Standards, a prominent existing brewery has two facilities within the East Ballard brewery district that are ~1,875' apart "as the crow flies."

27-5

- MAK believes the limitations proposed on restaurant/bar/outdoor patios are too low and would result in many existing facilities being non conforming. MAK strongly urges the City to encourage the expansions of these uses particularly those tied to breweries that reside within the district. And to establish separate definition for breweries, restaurants and bars.

27-6

- The DEIS has not adequately assessed transportation impacts. For instance, MAK notes the suggested 1/1000 maximum parking limit for the II zone. This will create significant impacts that have not been assessed as parking may be required (particularly away from transit-rich areas) to support non-industrial uses in industrial development. Industrial businesses require street space to operate and especially early morning loading zones.

27-7

- To fully evaluate industrial uses and impacts, as described in this DEIS, the City must clearly define what uses will be industrial. MAK suggests an expansive definition of users that participate in the creation, production and movement of goods. And to expand the definition of goods to include and encourage innovate uses such as computing information and medical research. Further the definition should not strictly require service from, for example, a service elevator with certain capacities instead base the definition on the activity needs of the use.

27-7

- The DEIS does not adequately assess how further limiting non-industrial uses will impact surrounding neighborhoods. If non-industrial uses are significantly limited in the former IG zones

27-8

then office and some other uses often complimentary or adjacent to industrial, should be allowed outright to some extent in the areas around IG (or MML). 27-8 cont.

- The DEIS has not adequately considered how frontage and landscaping improvements might impact freight mobility. These requirements may be hard to achieve in industrial areas and may take away needed ROW for vehicle circulation, parking and loading needs. Consider reducing some requirements to narrower sidewalks and smaller landscaped areas. Consider allowing waiver/reduction of these requirements through a Type I Director Decision, under certain criteria, since industrial will not be subject to Design Review and will need some flexibility in some of these requirements. 27-9
- MAK supports no design review. Design review creates a cost, timing, and risk burden. 27-10
- Consider a Transfer of Development Rights program for industrial lands within the BINMIC.

EXISTING BUILDINGS

- The DEIS does not adequately assess impacts to the proposal will have on the existing built environment in particular impacts to buildings or uses that will be rendered non-conforming through implementation of the proposal. As part of mitigation strategies related to land use impacts, a recommended mitigation should be flexibility in building codes to adaptively reuse aging warehouses/industrial buildings. Currently substantial alteration rules make it extremely difficult and costly, for both developer and tenant, to reuse existing buildings—substantial alterations are almost always triggered by the “change of use” provision alone and are not made by DCI in a timely manner. This leads to uncertain and protracted outcomes that make planning for and implementing these projects difficult. 27-11
- MAK encourages the City to improve TIPS sheet, additional guidance, or other streamlining practices for permitting breweries in Ballard; consider removing substantial alteration triggers or exempting certain projects under 10,000sf; and consider no parking requirements for certain brewery spaces.
- The focus of the Development Standards and rezoning in general, is for NEW developments, not the expansion of existing businesses into existing buildings: this is a very common process by which small businesses have been able to successfully grow in the Ballard area. The new code could hinder expansion of existing businesses, especially if their expansion was for an ancillary use, like office. For example, if a brewery wanted to locate their offices in an adjacent, existing warehouse it should be permitted to do so. In the absence of such allowances, the proposal will likely force existing business out of the area because of lack space or the cost of new development to unify operations under one roof on one parcel.

EXISTING BUILDINGS, NONCONFORMING USE

- MAK is concerned with nonconforming uses. The DEIS and general development standards do not explain how lawful nonconforming uses will be addressed under the proposal. Existing uses legally permitted under current industrial zoning should not be rendered nonconforming as a result of these changes. And flexibility should be conferred whenever possible to meet needs of a changing City, and as building stock adapts to changing behaviors and uses resulting from COVID (for example, how/if offices are used). 27-12

- If Magnolia-Interbay/Fisherman’s Terminal adjacent is designated MML, all of the current office buildings along 21st would become nonconforming. This is problematic as many of these office buildings actually assist industrial uses. And will require flexibility to adapt to how/if users of office interact/utilize with the built environment post COVID.
- Existing nonconformities related to loading should be able to occur for changes of use from industrial to industrial in existing buildings. Currently different industrial categories require the addition of loading areas, which make reuse of existing buildings impossible. Again, allow for the waiver of this requirement as a Type I Director’s Decision, as design review departures are not available.

27-12 cont.

COORDINATING WITH OTHER PLANS, INCLUDING SOUND TRANSIT

- The City should delay implementation of the proposal and FEIS until Sound Transit selects the route for its planned light rail extension into Ballard (expected in 2023). The ultimate locations of the stations will have profound impacts to the proposal and analysis of the proposals suitability and impacts. Land use and transportation must work together, and the impact of the final location of the Ballard station on the land uses surrounding it cannot be understated. It would seem that waiting for a location decision from Sound Transit prior to choosing a preferred alternative and moving ahead would be a good idea.
- The DEIS mentioned Ballard specific sub area plans, but this was not clearly included.
- The MIC boundaries have not been changed significantly since their inception in 1994 (EIS, p. 1-7). Much has changed in the City since 1994. Examination of whether certain areas within the MIC, or that are zoned industrial, should continue to be zoned industrial, must be completed (we have provided a list of examples of areas that should be rezoned out of industrial) The DEIS has not adequately assessed how the proposal will impact these areas. Notably, the City did not state that an objective of the proposal is to achieve “no net loss” of industrial lands. Indeed, Alternatives 3 and 4 take some areas of Georgetown and South Park out of industrial zoning. Similarly, areas on industrial edges should be closely examined to determine if they warrant industrial zoning, or whether other zones would be a better fit for the property.
- The area of existing IC and IB zoning along Market St. at the west end of Ballard is shown in the MML zone under Alternatives 2 and 3. This is not a good fit for this area and the DEIS does not adequately assess the light, air, noise, traffic and land use compatibility impacts the proposal would have on the surrounding neighborhood. MAK discussed with local stakeholders, and there appears to be agreement that the area of Market from 24th Ave NW to 30th Ave NW could be NC3-75, due to the adjacent zoning north of Market of the same, and that this is an edge OUTSIDE the BINMIC; density, mixed use, and housing make sense here. While NC is MAK’s preferred alternative, a denser form of UI that encourages residential uses in the mixed use/“stacking” format discussed above, could also meet the demands of this immediate area. The emphasis should be on stacked/mixed uses, that includes more flexibility and density within non industrial uses and encourages industrial uses more compatible w this surrounding neighborhood (for example breweries, craft food manufacturing, etc) as opposed to more environmentally impactful industrial uses (for example, scrap metal, recycling, waste disposal, heavy manufacturing.

27-13

27-14

27-15

27-16

- This body of work is significant and should be incorporated into, and considered with, the City's Major Comprehensive Plan update. Buildable lands analyses and jobs growth targets will be significantly impacted by this update to the industrial lands policies.

27-16 cont.

Property-Specific Comments

Address: 21st Ave W, North of W Emerson Place and South of Commodore Way

Neighborhood: Interbay

Current Zoning: Mainly IG2 U/65

Current Use: 4 story office

Discussion: 21st Ave W before turning into Commodore consists primarily of low to medium height office much of which is used to support industrial business. Converting this area to MML would render the existing built environment non-conforming and therefore difficult to modify, permit or improve. This issue is further magnified by need for flexibility to adapt spaces in existing office buildings to whatever office users need in covid to post covid (or endemic) phase. Please see comments above regarding nonconforming uses. Please designate this area, which is not heavy industrial but more industrial-supportive office, as a more flexible zone (IC or IG, modified version of II or UI), with additional flexibility for existing office to remain and adapt (replace existing nonconforming use with nonconforming use allowed), as well as be supportive of potential redevelopment that would allow industrial and office together, per comments above.

27-17

Address: 2715 W Fort St, 98199

Neighborhood: Interbay

Current Zoning: IG2 U/65

Current Use: Brewery, production and taproom

Discussion: This property is on a small lot and is likely highest and best use/is unlikely to be further developed. MAK's issues/concerns here would be those for MML and land use policy changes currently under consideration more generally. MAK does not want to render this, or any property, use nonconforming.

27-18

Address: North side of NW 53rd St, Between 15th Ave NW and 14th Ave NW, 98107

Neighborhood: East Ballard

Current Zoning: IG2 U/65

Current Use: auto repair; distribution/logistics

Discussion: This area is uniquely close to all the 15th and 14th alternatives for the future Ballard light rail station. It's hard to consider the City's proposal for industrial lands without considering the Sound Transit EIS. MAK assumes the City may add an overlay or requirements that applies to the station and the immediate area surrounding the new station. Overall, MAK's goal is to be able to manage as is, without future development blight (see nonconforming use issues above), then achieve highest density possible once transit station development begins in collaboration with neighborhood stakeholders. II or UI with an overlay for the highest FAR, and some housing allowed in this edge location near a station would be a good option for this general area.

27-19

Address: 5010-5014 14th Ave NW, 98107
Neighborhood: East Ballard
Current Zoning: IG2 U/65
Current Use: Brewery, production and taproom w large outdoor beer garden
Discussion: MAK's general comments apply here. But this property has one unique consideration –Sound Transit could potentially purchase it for light rail construction. This is obviously problematic for the brewery cluster. This property should be designated UI, and ensure brewery uses, outdoor patios, are allowed and encouraged. And the City should advocate against Sound Transit from harassing and disrupting Ballard breweries in the industrial neighborhood.

27-20

Addresses: NW 50th and NW 52st between 14th Ave NW and 11th Ave NW
Neighborhood: East Ballard
Current Zoning: Mostly IG2 U/65 some IB U/45
Current Use: IG/IB uses including office, storage, light manufacturing, brewery and taproom
Discussion: MAK owns property in this area and wants to be able to manage these properties with their current uses and with current tenants, as they grow and needs change/evolve, without concern about restriction associated with classification as non-conforming use. This area is proximate to existing residential neighborhoods and the largest park in the BINMIC (Gilman Playground). Given these characteristics in addition to a new light rail station more flexibility and density seems appropriate for this area.

MAK has warehouses on NW 51st St that are concrete tilt up type that have been recently modernized with high clearances, fire sprinklers, big power and gas, plus several other upgrades for industrial use. While these properties could form an assemblage in the future, these recent improvements would make redevelopment difficult unless the new land use allows a much higher FAR w more flexibility than the MML/II/UI proposed. MAK is generally open to more density, but is concerned about being able to manage these properties with current uses, particularly the taproom and beer garden, if the change renders these uses non-conforming.

27-21

Additionally, MAK is evaluating design to expand an existing brewery taproom in this area, but is unsure when/if we will pursue this project. MAK's conceptual planning, pre MML/II/UI, had focused on something similar to the Trail Bend development located at 1118 NW 50th St, 98107. Unfortunately, both this taproom/beer garden expansion, and redevelopment to Trail Bend type property, would not be allowed in UI/II as currently written, even though this type of development seems to provide a good transitional combination of uses between the residential neighborhood to the east and industrial core to the south and west.

Addresses: 800 NW 46th St, 98107
 4515 8th Ave NW, 98107
Neighborhood: Frelard
Current Zoning: IB U/45
Current Use: Brewery including production, storage, office and taproom

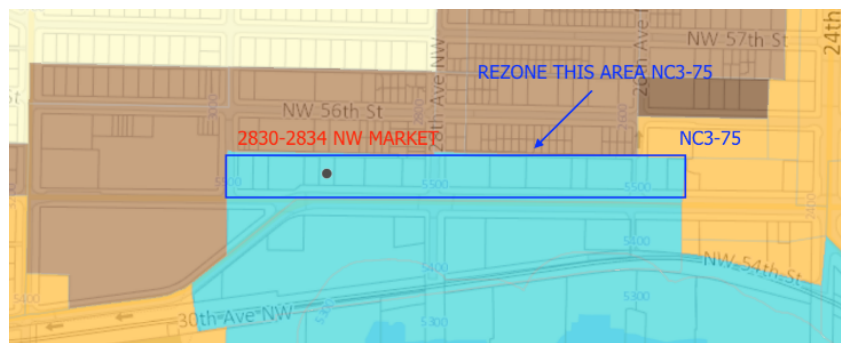
27-22

Discussion: MAK and the tenant brewery have invested heavily in the 800 property as a beer production facility and 4515 as support for production including storage and office. In general, MAK and brewery tenant want to be able to manage these locations w flexibility for the brewery’s “entrepreneurial spirit.” **An issue unique to these properties, is they are shown as MML on the maps, even though they are north of Leary. Please correct this mistake, as these properties are intended to be UI.** Unfortunately, the error was not corrected in the latest version of the EIS. Moreover, due to the absence of development standards it not clear if industrial uses like beer production will be permitted to have related taprooms and support services on parcels other than the one where production occurs. This is a significant issue for this area where businesses rely on taprooms to provide support for their operations but parcel size may not allow it to occur on the same parcel. Please ensure that the error designating as MML is corrected to II/UI, and all of MAK’s comments related to nonconformities and flexibility to expand for other properties apply here.

27-22 cont.

Addresses: NW Market St, 98107 west of 28th Ave NW
Neighborhood: Adams neighborhood of Ballard, west of 15th
Current Zoning: IB U/45
Current Uses: Tavern/restaurant (Sloop); retail w storage (currently vacant)
Discussion: MML is not a good fit for this micro location. The emphasis of MML on industrial use is not consistent with the character of the immediate neighborhood. The northern part of the same block is developed with townhomes and apartments. MAK discussed with neighborhood stakeholders, and at this time there seems to be agreement that the area of Market from 24th Ave NW to 30th Ave NW could be non-industrial like NC3-75, due to the adjacent zoning North of Market of the same, and that this is an edge OUTSIDE the BINMIC; density, mixed use, and housing make most sense here. While NC is MAK’s preferred alternative, a form of UI that encourages residential uses in the mixed use/“stacking” format discussed above, could also meet the demands of this immediate area. The emphasis on stacked/mixed uses, that includes more flexibility and density within non industrial uses and encourages industrial uses more compatible w this surrounding neighborhood (for example breweries, craft food manufacturing, etc) as opposed to more environmentally impactful industrial uses (for example, scrap metal, recycling, waste disposal, heavy manufacturing).

27-23



APPENDIX A

General Comments on the DEIS

A. The Proposal is a De Facto Zone Change and Must be Considered Together with the Specific Implementing Development Regulations

The DEIS is inadequate because the City has not proposed (and therefore cannot assess the impacts from) the specific development regulations that will implement the proposal. The DEIS positions the proposed action as a comprehensive plan amendment and declares that specific development standards will be developed later (and presumably assessed in a subsequent or supplemental EIS). The proposal, however, is a de facto rezone and the specific, implementing zoning regulations must be included to assess the environmental impacts adequately and reasonably.

While the DEIS posits the proposal as an amendment to the comprehensive plan it admits in numerous instances that it is a “rezone”. See e.g. DEIS at 1-43 (“The alternatives differ in the amount of area that would be rezoned as well as the number of residential units that would be constructed.”); 1-63 (“Alternatives 2, 3, and 4 feature different amounts of land rezoned to the proposed new UI and II zones that would allow denser development—with alternatives 3 and 4 having more land rezoned to II or UI.”). The proposed boundaries of the new industrial land designations in the comprehensive plan will become the de facto boundaries of the corresponding industrial zones. As with any rezone, the environmental impacts can only be adequately assessed based upon the specific development regulations that will implement the zone designations and policies.

The Growth Management Act requires that municipalities adopt development regulations that are consistent with and implement the comprehensive plan. Thus, once the plan designations, policies and map amendments are adopted the City must adopt implementing regulations that are consistent with the designations regardless of the impacts the specific regulations might have. Piecemeal, or phased, environmental review is inappropriate in cases such as these:

27-24

An oft-cited reason for denying piecemeal review is that it may permit adverse consequences to go unidentified until after the project has progressed that preventing its completion, or mitigating its consequence, becomes either unlikely or impossible.

Cathcart-Maltby-Clearview Comm. Cncl. V. Snohomish Cnty., 96 Wn.2d 201, 210 (1981). Here phased or piecemealed environmental review of what amounts to a zone change without the context of the specific development regulations is inappropriate because the zoning boundaries are being set by the proposed action. And, because the City has elected to marry the comprehensive plan designations to the future zones, moving zone boundaries to mitigate for unknown and unknowable impacts from the specific development regulations to mitigate those impacts becomes unlikely or impossible.¹

¹ The inability to move boundaries to address impacts during review of the specific development regulations cannot be understated. As part of the proposal the City proposes to prohibit changes to the proposed industrial

The City cannot and should not leave parties having to guess what the possible impacts of the proposal will be. And, parties are forced to guess unless and until specific development regulations that are consistent with the new policies are proposed. SEPA requires more.

27-24 cont.

To the extent that City decides to proceed with phased review, which it should not, it should confirm in the FEIS that the selected boundaries for the new plan designations and zones are subject to change during environmental review of the specific implementing development regulations.

B. The “Action” or “Proposal” is not Sufficiently Defined to Allow Meaningful Environmental Review Because “Industrial” is not Defined

The inability to adequately assess impacts because of the lack of specific development regulations is highlighted by the absence of a concrete proposal of what is and is not “industrial”. The DEIS mentions “industrial” 2,862 times over 722 pages. Yet, nowhere does the DEIS comprehensively define either by policy or regulation what is or is not industrial. The DEIS cannot meaningfully review the alternatives or the environmental impacts of the new designations and policies for industrial lands without qualifying what it means by “industrial”.

For example, and without limitation, one of the objectives, if not the primary objective, for the proposed action is the preservation of land for “industrial” job growth and creation. Accordingly, the DEIS assesses the industrial employment projections of the various alternatives. Buried in a footnote, however, is a statement that industrial employment numbers relied upon by the DEIS include jobs in Information Computer Technology. (DEIS at 2-44). It is not clear how the DEIS can project employment numbers under the various alternatives without a policy or development regulation defining whether and to what extent uses that generate ICT jobs (among other categories of jobs) will be allowed in some or all the new zones.

27-25

The Seattle Maritime and Industrial Strategy Updated Employment Trends and Land Use Alternatives Analysis (“ILETL”) acknowledges that companies that generate large number of ICT jobs are typically classified as “office” uses:

ICT has been growing significantly in industrial areas, at an annual average rate of 10.4% from 2010 to 2018 and 8.4% from 2000 to 2018. With Expedia locating their Seattle headquarters in the Interbay Neighborhood and an Amazon office already present here, ICT is expected to continue growing in industrial areas.

(ILETL at 16 (emphasis added)). Expedia’s headquarters and Amazon offices are “office” uses. The proposed general development standards would seem to prohibit or significantly restrict uses in the

designations to non-industrial uses unless it is part of a City-initiated study or major update to the Comprehensive Plan. (DEIS 3-245).

study area that would permit the projected increase of ICT jobs referenced in the ILETL like a technology headquarters or office.

27-25 cont.

C. The Alternatives are not Reasonable Because they are Inconsistent with the Locational Criteria and Proposed Policies

The alternatives do not reflect the location criteria for the new designations and are not reasonable. For example, one of the criteria for MML is that lands designated MML be within a MIC. Yet, all alternatives designate land outside of MICs as MML. For example, and without limitation, Alternative 2 designates land that is currently outside of the BINMIC and zoned Industrial Buffer and Industrial Commercial as MML along NW Market and Leary Way NW.

Likewise, all alternatives designate areas dominated by small parcels as MML. For example, and without limitation, the DEIS acknowledges that parcels fronting N. 36th in the Fremont Urban Village are small (DEIS at 3-263), yet most of the area is designated MML contrary to the predominate parcel sizes and existing built environment. All alternatives also appear to designate the land along 14th Ave south of 51st as MML even though the lots between 50th and 51st are predominantly smaller in size. The general development standards state that areas within ¼ to ½ mile of existing or planned transit stations should be designated II. Alternatives 2 and 3, however, do not designate II within Sound Transit’s planned stations in Ballard, and elsewhere. In order to properly evaluate impacts the proposed alternatives must be in alignment with the proposed locational criteria.

27-26

Finally, the alternative maps are not sufficiently clear and may conflict with the textual descriptions. The alternative maps do not provide a sufficient degree of detail to determine actual zone boundaries. As a result, the text describing the alternatives conflicts with the maps depicting the changes. For instance, the Land Use Compatibility section discussing Alternative 3 in Ballard states that the “Ballard uplands in the 14th Avenue NW corridor north of NW Leary would be placed in the UI zone”. (DEIS 3-295). Yet, the map for Alternative 3 shows MML north of Leary Way NW along 14th up until what appears to be 52nd. It is impossible to assess, much less comment on, the impacts of these boundaries without clear delineation of the proposed boundaries.

D. The DEIS is Inadequate Because the Alternatives are not Adequately Segregated or Assessed for Each Sub-Area in the Study Area

The DEIS acknowledges that the characteristics of the study area vary greatly. The characteristics of the BINMIC and its surrounding areas are entirely different from those in the Duwamish MIC and its surrounding areas. Yet, the DEIS alternatives present a one-size fits all approach to reviewing and considering alternatives. The DEIS’s alternative analysis forces selection of a single alternative based on its ability to meet objectives and minimize impacts on a region-wide basis instead of a subarea basis. This is inconsistent with SEPA.

27-27

The City should follow the lead of other government entities and propose, review and select alternatives on a sub-area basis. For example, Sound Transit commonly proposes alternative alignments for discrete sub-areas of a larger expansion which allows them to evaluate and select alternatives that

best achieve objectives and minimize environmental impacts on sub-area basis. (See e.g. West Seattle and Ballard Link Extension Draft Environmental Impact Statement). This approach is not only required by SEPA, but will result in an alternative analysis and selection that best meets the objectives and the needs of each subarea.

27-27 cont.

E. The DEIS Does not Adequately Consider Sound Transit’s Planned Ballard Light Rail Extension Project.

The DEIS is inadequate because it fails to consider Sound Transit’s planned light rail expansion through significant portions of the study area. For instance, Sound Transit’s Ballard Extension considers four alignments through the Study Area. Sound Transit anticipates selecting a location in 2023. The ultimate selection will place a light rail line and a light rail station in the areas under consideration including Interbay and Ballard.

27-28

The location criteria for MML requires large parcel sizes. Some of the route selections would bisect existing parcels rendering them unsuitable for MML—not to mention unsuitable for actual development. Similarly, there are four stations proposed between 15th Ave NW and 16th Ave NW and NW Market Street. The locational criteria for the proposed II designation is within ¼ mile (1,320 feet) or ½ mile (1,640 feet) of an existing or planned high capacity transit station. None of the alternatives map or assess the II designation to account for a station in this area. A ½ mile radius around the planned stations along NW Market would encompass the area as far west as 24th and Market and as far south as Salmon Bay.

F. The DEIS Does Not Adequately Assess Impacts on Land and Shoreline Use

The DEIS Does Not Adequately Assess Impacts on Land and Shoreline Use because it does not consider how implementation of the new policy and mapping changes will impact the existing built environment and does not assess conflicts with Shoreline Management Program. The general development standards in the DEIS propose significant departures from current development regulations and sites developed under those regulations. For example, areas presently zoned IG2 are allowed to develop and have been developed with 25,000 square feet of office. The proposal would designate most of the IG2 zoned property to MML and limit office to 10,000 square feet. The DEIS makes no attempt to determine how implementation of those general development regulations might conflict with current permitted development and the non-binding general development standards are silent (with the exception of II) with respect to how the nonconforming uses created by the proposal will be addressed.

27-29

Additionally, the DEIS does not adequately assess impacts on shoreline use. The DEIS asserts that “[n]o amendments [to the SMP] are a part of the proposal”. (DEIS at 3-253.) This is incorrect. Development in the shoreline must meet the development standards of both the underlying zone and shoreline designation in which it is located. SMC 23.60A.016.B; -C.1. Thus, the SMP incorporates the regulations of the underlying zone if they are more restrictive. The proposed Comprehensive Plan policies and general development regulations that will implement those policies will result in de-facto changes to the SMP by prohibiting or further restricting development and uses that are otherwise allowed in the SMP. For example, much of the current shoreline along the canal is zoned IG and is located within the

Urban General, Urban Industrial and Urban Maritime Environments. All of these designations permit “non-industrial” uses that the planned amendments would either eliminate or significantly restrict. The DEIS does not assess these conflicts with the SMP.

Finally, the DEIS does not assess how limiting previously allowed non-industrial uses will impact the availability of services to the growing populations in and around the Study Area. By restricting the size and type of non-industrial uses the City is limiting the available land for services provided by those uses. For instance, much of the development in the BINMIC study area that the City now perceives as undesirable occurred, in part, because of changes the City made to neighborhood commercial zones that restricted the size of certain commercial uses like grocery stores. The inability of these services to locate in NC zones proximate to their customer base likely forced them to locate to the next closest area—the industrial zones. The impacts of further restricting these uses in the new industrial designations will have impacts that have not been addressed in the DEIS including, but not limited to, transportation impacts and air quality impacts as residents of neighborhoods proximate to the Study Area will be required to travel further away from their neighborhoods to secure goods and services.

27-29 cont.

G. The City Should Assess Purely Economic Impacts

The City emphasizes the need to examine the “equity” impacts of its proposal while steadfastly maintaining that it has no obligation to address “purely economic impacts on individual businesses.” (DEIS 3-273). The purely economic impacts to existing businesses and land owners in the Study Area from the proposal are significant. The Proposed Action, as far as we can tell, will result in a significant downzoning of the Study Area. These economic impacts will extend far beyond impacts to the business and land owners in the study area.

27-30

The City discounts economic concerns by claiming that “[a] wide variety of land uses would be allowed . . . under all alternatives sufficient for robust economic use of property.” The statement is self-serving, lacks support and ignores that the City has not presented the proposed development regulations that will implement the new policy changes. If indeed a wide variety of land uses will be allowed the City should specify those uses now and allow those persons most familiar with economics of development and managing property in the study area to determine whether they provide sufficient robust economic use of property as the City contends they will—not to mention whether they will encourage redevelopment of land in the Study Area.

Holmes, Jim

From: Lisa Howard <lisa@pioneersquare.org>
Sent: Friday, February 11, 2022 2:53 PM
To: PCD_Industry_And_Maritime_Strategy
Subject: Alliance for Pioneer Square DEIS comments
Attachments: 220211 Industrial and Maritime DEIS APS.pdf

CAUTION: External Email

Hello

Pleased see the attached on behalf of the Alliance for Pioneer Square. Thank you for the opportunity to submit comments.

Best,

Lisa Dixon Howard

Executive Director

ALLIANCE FOR PIONEER SQUARE

lisa@pioneersquare.org

O: 206-667-0687 ext 102 | C: 206-384-5715

www.pioneersquare.org | www.allianceforpioneersquare.org

(mailing address): PO Box 4507 | Seattle, WA 98194

(if you're stopping by): 105 S Main St, Suite 201 | Seattle, WA 98104



February 11, 2022

Via email

Jim Holmes
Office of Planning & Community Development
P.O. Box 94755
Seattle, WA 98124

Re: Comments of Alliance for Pioneer Square on the Draft Environmental Impact Statement on the Seattle Industrial & Maritime Strategy

Dear Mr. Holmes:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Seattle Industrial & Maritime Strategy. These comments are submitted on behalf of Alliance for Pioneer Square (“Alliance”).

Alliance is a neighborhood association that exists to foster and preserve the qualities and characteristics that make the Pioneer Square neighborhood historic, and that have made it one of the most unique, inviting, and exciting neighborhoods in Seattle. Alliance has helped keep the Pioneer Square neighborhood vibrant by promoting a mix of office and residential uses along with shopping, dining, and cultural attractions, with pedestrian oriented streetscapes, human scaled buildings, and friendly public spaces. Over the last 30 years the Pioneer Square neighborhood has succeeded in attracting hundreds of millions of dollars in new investment, hundreds of new residential units, and become not just home of the new headquarters of Weyerhaeuser Company, a regional icon, but also many technology startups – all while continuing to host the highest concentration of social service providers in the region and a wide mix of socioeconomic groups.

That remarkable balance of old and new, rich and poor, and all types of people is a fragile thing, however. The combination of the global pandemic and the homelessness crisis in our region has been brutal to Pioneer Square. While Alliance is confident that Pioneer Square will spring back, at this time it needs all the help from the City and the region that it can get.

In that regard, we appreciate that the Seattle Industrial & Maritime Strategy sets as one of its objectives to “promote mutually reinforcing mixes of activities at the transitions between industrial areas and urban villages or residential neighborhoods.” DEIS at 1-12. Pioneer Square abuts the SODO/Stadium subarea of the Duwamish MIC, and the development of the transition area presents the opportunity to aid the recovery and future development of Pioneer Square – or to detract from that process. We are particularly encouraged by the City’s stated intent to “work with owners or future owners of the Washington Oregon Shippers Cooperative Association (WOSCA) and Interbay Armory sites on a master planning process for the future reuse according to the goals and policies of the MICs.” *Id* at 1-16, 1-25, 2-20, 2-43. At approximately six acres, the WOSCA site has the potential to make a significant contribution to both the City’s goals for industrial land and to the stabilization and recovery of Pioneer Square. Alliance believes that a robust master planning process for the WOSCA property,

28-1

including surrounding stakeholders can assist in insuring that it realizes its potential as a major public asset.

We are concerned, however, that the proposed UI zoning may hinder the best development of the WOSCA site from both the perspective of the goal of greater equity and environmental justice and the goal of a transition between Pioneer Square and the SODO/Stadium subarea of the Duwamish MIC, by fostering unneeded office use and restricting development of needed workforce housing.

One of the defining characteristics of industrial areas from an urban fabric standpoint is that they tend to be devoid of street life. Industrial uses may or may not function on a 24/7 basis – but their workers are focused on the job to be done, and not on shopping, dining or other street-facing activities. Office workers tend to come in the morning, and leave before 6 p.m., leaving their areas deserted the rest of the day. Thus, both office and industrial use tend to leave a vacant street scape.

What Alliance has learned in its decades of fostering the balanced development of Pioneer Square is that the key to attracting both its residential uses and investment in high tech and signature office spaces such as the new Weyerhaeuser headquarters is the attractiveness of life on its streets. And the first requisite for those vibrant streets is the perception of public safety. Only when people feel safe on the streets will they fill the sidewalks, and thereby support the attractive retail and entertainment uses that in turn attract more residential and desirable office use. The key to creating the virtuous circle that has propelled Pioneer Square for the last 30 years is adequate density of housing, because only adequate housing density puts enough eyes on the street, 24/7, to create the perception of public safety. To further that goal, Alliance has worked for decades to increase the quantity and type of housing available in and around the Pioneer Square neighborhood. We believe that master planning of the WOSCA site should set as one of its objectives increasing the stock of work force housing in close proximity to both the industrial jobs of the Duwamish MIC, and the residential amenities in and around Pioneer Square.

28-2

Increasing workforce housing close to the jobs in the Duwamish MIC will also foster the City's goals of increased equity and environmental justice. Decades of policies based on old rules that redlined the City and created segregation and inequality from the south end of the financial district south to Tacoma, have contributed to the conditions we see today—concentrations of people experiencing homelessness relegated to “transition zone areas” with the City and the County focusing on trying to house the unhoused where they concentrate, not where they originate or where they are better equipped through services and support, to recover and learn to thrive. While Alliance has worked to improve the quality of existing homeless services in the neighborhood to address the needs of our street residential population, we have sought to increase the diversity of our residential population. To that end, we have sought specifically to increase work force housing, as well as market rate housing. Pioneer Square is located between downtown and the industrial lands the City seeks to protect, in order to provide more jobs, and thus equity to women, and black, indigenous and peoples of color. If the City is to do more than pay lip service to equity and livability, the city must make explicit its commitment to making good industrial jobs accessible by ensuring that ample affordable housing is located near such jobs, in neighborhoods and areas that are enjoyable to live in. Pioneer Square and the transition properties located to the west and immediately south of the neighborhood provide good locations to live near amenities such as the newly redeveloped Waterfront, Elliott Bay, major transit hubs such as King Street and Union Street stations and Colman Dock. Land use policies immediately adjacent to livable neighborhoods should prioritize housing and development opportunities that protect good paying jobs, and increase access to them.

The draft EIS states that the “place” objectives in the Industrial and Maritime proposal seek to create “mutually reinforcing mixes of activities” and “increase access to workforce and affordable housing for employees in the industrial maritime sectors.” Mutual reinforcement to Pioneer Square would mean that available, immediately adjacent properties to the neighborhood, such as the WOSCA property, are zoned for opportunities that complement the objectives of the Industrial and Maritime proposal and Pioneer Square’s strategic goals. This should mean that more diverse housing opportunities are possible on the WOSCA property.

Conversely, Pioneer Square does not need more office space, and it does not need more office space nearby. Office space would only serve to reinforce the limited 7-to-5 activity that comes from a population of office workers. The DEIS recognizes that one of the important characteristics of jobs in the City’s industrial areas is that about two-thirds of the 98,500 current industrial jobs are available with only a high school diploma, and over half of the jobs in the maritime sector are available to persons with no formal educational training. DEIS at 1-6. Using industrial land to provide office uses, unless those offices are ancillary to the industrial uses on the property, does little or nothing to provide jobs for people with only a high school diploma. Thus, both Pioneer Square’s goals and the goals of the City’s industrial policies are not furthered by placing additional office use on the WOSCA site. As the City has currently described its new Urban Industrial land use designation, it would appear to leave the WOSCA site at risk of becoming an office mega block. That will serve none of the City’s objectives for its industrial areas.

28-2 cont.

While the DEIS’s description of the desired uses in the UI and II zones is attractive, the City must realize that the zones are also experimental. We do not know that the desired first floor industrial use will materialize just because the space is created. The apparent reason for permitting office uses on upper floors is to create a revenue stream for the landowner, while requiring that the street level be reserved for industrial uses. But if land is developed on “spec” for industrial use, with upper floor office use, there is a real possibility that the street level will simply remain vacant. That would create the worst possible situation for Pioneer Square – as the vacant street level would provide nothing to attract people to the area, and will result in a feeling of lack of safety that can blight not just the area in question but the area around it. Thus we urge the City to place limitations on the ability to utilize the II and UI zoning without first demonstrating that the industrial use will occur.

In summary, we look forward to participating in a robust master planning process for the WOSCA property. We urge the city to tailor its UI zoning so that it leaves open the opportunity to use upper floors of the WOSCA site for industry supportive or work force housing, while encouraging new spaces for makers, artists, and other uses appropriate for transitional industrial sites.

Very truly yours,

Lisa Dixon Howard

Lisa Dixon Howard
Executive Director

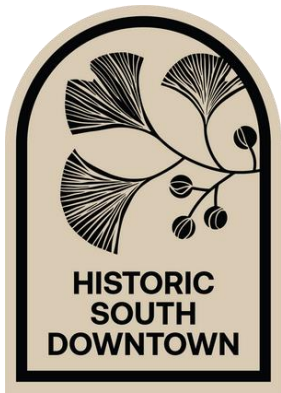
Holmes, Jim

From: Kathleen Johnson <kathleen@historicsouthdowntown.org>
Sent: Monday, January 31, 2022 11:32 AM
To: PCD_Industry_And_Maritime_Strategy
Cc: MaryKate; lisa@pioneersquare.org; Phelan, Dana
Subject: HSD DEIS Comment Letter - M&I
Attachments: 2022 HSD Comment Letter on Marine & Industrial DEIS.pdf

CAUTION: External Email

Thank you for the opportunity to comment on the M&I DEIS. Please find HSD's comment letter, attached.

Kathleen Barry Johnson
Executive Director
Historic South Downtown
historicsouthdowntown.org
206-351-4813



27 January 2022

Seattle Office of Planning and Community Development
Comments delivered by email

RE: Seattle Industrial & Maritime Strategy

City of Seattle,

HSD BOARD

Dana Phelan, President
PS Arts & Theatre

Derek Lum, Vice President
Planning

Jessica Rubenacker, Secretary
CID Arts & Theatre

Shava Lawson, Treasurer
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Jessa Timmer
PS Non-profit Organization

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CID Non-profit Organization

Aleksa Manila
CID Culture & History

Ken Takahashi
Local Legislative Authority

Stephanie Pure
Local Legislative Authority

www.historicsouthdowntown.org
409B Maynard Ave S
Seattle, WA 98104
206.351.4813

Thank you for the opportunity to comment on the proposed Industrial and Maritime zoning strategy through the Draft Environmental Impact Statement. Historic South Downtown is a state-chartered authority charged with the preserving, restoring, and promoting the health, safety, and cultural identity of Seattle’s Pioneer Square and Chinatown-International District (C-ID) neighborhoods. Our geographic boundaries match those of the city’s historic preservation review districts. As such, changes in the Stadium/SODO area of the Duwamish MIC border and intersect our areas of concern.

29-1

We believe that specific definition of the different functions that industrial lands serve in Seattle could benefit our neighborhoods, particularly in defining marine/maritime functions along the waterfront. Additionally, the “Urban Industrial” and “Industry/Innovation” zones that would define a transition area along the west side of the stadium area and the south side of the CID have the potential to benefit the edges of both historic neighborhoods. Increasing housing and creative industrial spaces, particularly if both of these are affordable, could benefit our neighborhoods, as would the increase in pedestrian and bicycle infrastructure.

Rezoning can only benefit the neighborhoods of Pioneer Square and the C-ID if it does not cause displacement of existing businesses and residents. The City should consider providing additional resources to the Pioneer Square Preservation Board to review changes to historic buildings and to the International Special Review District or the Office of Economic Development for discussions with the remaining industrial properties within the CID boundaries.

29-2

Local ownership of buildings in the historic districts is a priority for the neighborhoods. The displacement pressure brought on by rezoning, coupled with the cost of retrofitting unreinforced masonry, can accelerate the loss of local control, which carries with it risks to the historic character of South Downtown, loss of affordability, loss of neighborhood cohesion and other issues. For these reasons, we believe the City should proactively prioritize support for unreinforced masonry retrofitting for landmarked buildings within this zone, which will decrease the risk of loss of local control.

For areas with increased residential units, the zoning should allow for provision of all services necessary for an increased residential population, particularly grocery stores and pharmacies located in reasonable walking or transit distances. HSD is concerned that the mitigation outlined in this DEIS for services including parks, schools, and libraries is limited to notations that the corresponding city agencies have existing master planning processes. Greater integration of this rezoning plan and the master plans would be desirable. Increasing residential units without integrating plans to increase the necessary amenities will unnecessarily increase critical service gaps.

29-3

We would like to see additional information on the new II zoning area adjacent to C-ID, which should include an analysis of how increased need for housing, services and other zoning changes may affect the historic neighborhood. For example, light industry has the potential to benefit this historic neighborhood if it is integrated well .

29-4

Pier 48 is not clearly addressed in the DEIS. This is a substantial omission. Historic South Downtown and the City of Seattle Office of the Waterfront have developed vision material relating to the redevelopment of pier 48 for public access. Such redevelopment would address the some of the need for increased park space in this part of the city, as well as add additional shoreline access. Furthermore, all work done at or near Pier 48 must be conducted with reference to the significant historical, cultural, and archeological value of the site. Pier 48 incorporates the historic Ballast Island, which was the location of the last Native American settlement within Seattle until it was destroyed in the 1890s. Additionally, the site is connected to the expulsion of Chinese residents from the city in 1886. None of this is included in the cultural resources chapter.

29-5

As the entire Duwamish MIC area rates as having a high potential for archaeological discovery, we would like to see mitigation recommendations for proactive survey on publicly-owned parcels of land, as well as on vacant lands. In the mitigations for cultural resource impacts, the study area histories should center indigenous perspectives, yes, but should also include the histories of the many equity-seeking populations who have worked on the waterfront and lived in adjacent neighborhoods.

29-6

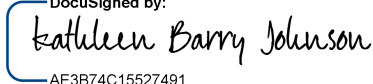
Conclusion:

The city's Industrial and Marine Strategy, if carefully implemented, could create more small industrial spaces as well as additional transitional spaces between the city's industrial areas and the historic neighborhoods of Pioneer Square and the Chinatown International District. In order for these changes to be equitable, mitigation in the form of city oversight of zoning implementation, additional resources for city departments who can help to enforce equitable practices, and proactive protection of historic and cultural places are needed. Additionally, for areas where additional housing will be allowed, provision of appropriate services must be allowable under the zoning. The DEIS addresses these issues, but the final EIS would better serve its purpose with enhanced attention to the equity and culture issues we have identified for the areas adjacent to Pioneer Square and the CID.

29-7

Thank you for the opportunity to provide comments on this draft EIS.

Sincerely,

DocuSigned by:

AE3B74C15527491...

Kathleen Barry Johnson
Executive Director
Historic South Downtown

Holmes, Jim

From: HS Krohn <hskrohn55@hotmail.com>
Sent: Thursday, March 03, 2022 10:26 PM
To: PCD_Industry_and_Maritime@seattle.gov
Cc: Quirindongo, Rico; Holmes, Jim; Harrell, Monisha; Persak, John
Subject: Comments - Draft EIS - Seattle Industrial and Maritime Strategy
Attachments: Comments - Draft EIS - Seattle Industrial & Maritime Strategy.pdf

Importance: High

CAUTION: External Email

Dear Director Quirindongo:

Please find the attached comments regarding our organization’s concerns with the draft EIS. We only learned of this process and EIS last week, so please consider accepting our input even though it is one day late.

Very Truly Yours,

Herb Krohn
Washington State Legislative Director
SMART Transportation Division/United Transportation Union
206-713-5442

Legislative Representatives:
Local # 117 – Trudie Peck
Local # 324 – Todd Kester
Local # 426 – Darren Volland
Local # 556 – Kirk Sides
Local # 845 – Ben Thuney
Local # 855 – Steve Mazulo
Local # 977 – Gary Howell



Legislative Representatives:
Local # 1238 – Shane Sadler
Local # 1348 – Herb Krohn
Local # 1505 – Donald “Bud” Newton
Local # 1637 – Jeremy Wurzer
Local # 1713 – James Wolgamuth
Local # 1977 – Travis Anderson

Washington State Legislative Board

Representing Railroad Train & Bus Service Employees of Washington State

11225 Roosevelt Way N.E., Seattle, WA. 98125

Washington State Legislative Board Executive Committee:

Herb Krohn – Washington State Legislative Director – 206-713-5442 email: hskrohn55@hotmail.com

Steve Mazulo – Assistant Legislative Director / Gary Howell – Board Chair & Alternate Legislative Director / Todd Kester – Secretary / Darren Volland – Vice Chairman

March 3, 2022

Mr. Rico Quirindongo, Interim Director
City of Seattle - Office of Planning & Community Development
P. O. Box # 94788
Seattle, WA. 98124-7088

RE: Comments regarding Draft EIS – Seattle Industrial & Maritime Strategy

Dear Director Quirindongo:

Our organization represents railroad workers including train service employees on BNSF, Union Pacific, AMTRAK as well as several short-line railroads across the state of Washington; our membership is a substantially large workforce within the industrial areas of Seattle being reviewed in this EIS. Unfortunately, we just became aware of this process and draft proposal last week, so we have not had adequate time yet to thoroughly review all of the aspects of the draft proposed actions and each of the Alternatives at every location where our members work. We regret this submission is one day late and ask you to please give consideration to the issues we have raised. 30-1

Nonetheless, the one issue that immediately stands out as seriously problematic are the proposals contained in Alternative 3 & Alternative 4 to upzone-focused MIC lands currently zoned as IG-2 in Georgetown into non-industrial mixed-use zones. 30-2

We are very concerned about the significantly increased safety risks to the public and our members who operate trains along the Union Pacific Track 101 lead spur in the Georgetown industrial area, from increased residential and mixed-use development adjacent to or near this track. Additionally, we are extremely alarmed by the prospect of considerably increased danger to our members that would result from a complete closure of the track 101 lead spur; as it completely cuts off yard switching access to the south end of intermodal ramps 6 through 10, this would create enormously greater safety risks and operational complications for our members working at Union Pacific’s Argo yard. 30-3

Upzoning of the areas adjacent to this track would create additional pressure on the carrier to consider the possibility of abandonment; history proves that US rail carriers are highly motivated by increasing their ever-greater record profits which are a significantly higher corporate priority than the safety and the lives of their expendable railroad workers! 30-4

BACKGROUND: UNION PACIFIC’S ARGO YARD & TRACK 101 LEAD SPUR:

Our greatest concerns center on any zoning changes near, adjacent to, or affecting Union Pacific’s track 101 lead spur track extending southward from Argo yard, its been in use for at least 100 years traversing the Georgetown area that has been undergoing gentrification over the last 20 years. 30-5

Track 101 lead has at-grade crossings at three active streets (S. Lucille Street, Corson Ave S., and S. Carstens Place), and two relatively quiet streets (S. Homer Street and S. Nebraska Street) as well as one adjacent parking lot crossing; railroad crossing signs are posted at all intersections, but no electric crossing warning devices or gates are in place along this track. The 101 lead spur runs approximately 3000 feet in a southward direction from Argo Yard in what is essentially a railroad alley behind a stretch of historic business buildings and alongside the edge of a park/playfield which is fenced off; Jersey barriers run on both sides in that block to Corson Ave S. The remaining length runs behind run-down industrial buildings on both sides, many with loading docks and doors across S. Homer and S. Doris Street, it terminates just north of S. Nebraska Street.

Someone seeing this lead track, with no concept of the work railroad employees perform or the layout and operations at Argo Yard may have an inaccurate impression that it might be an abandoned track due to the lack of electric grade crossing warning devices.

However, upon closer examination, the existence and use of this track substantially reduces safety risks to both the public and rail worker safety, lowers operational hazards, and contributes substantially to the efficiency of switching operations at Argo Yard.

Argo Yard is a narrow yard that runs in a southeast-(Georgetown, near Airport Way S. & S. Lucille Street) to-northwest direction (near E. Marginal Way S. and Highway 99). Argo yard consists of ten intermodal ramp loading tracks, eleven yard classification tracks, and one running track (track 24), as well as a roundhouse and locomotive service zone with multiple tracks and spurs for locomotives, centered within and around a railroad wye (used for changing the direction of locomotives).

There are four points of rail egress at Argo Yard:

- The Argo Interlocking access from/to the BNSF main-lines at the southeast end in Georgetown, the Argo interlocking connects to Argo yard; into two south end switching leads, the west side leads into yard classification tracks 3 through 8 as well as onto running track 24, and the east side leads into yard classification tracks 601 through 605. Running Track 24 accesses the south end of Intermodal Ramps 1 through 5, running northward adjacent to the Argo yard office, and accesses the north ends of Intermodal Ramps 6 through 10, track 24 continues northward into the locomotive service zone and roundhouse and the south end of the wye.
- The East Marginal Way industrial lead off of the north end of the wye and locomotive service zone where it connects to running track 24, after crossing Marginal Way at Diagonal Ave S.; this track runs approximately 4 miles southward to numerous industries along E. Marginal Way S.
- The BNSF Stacey Street lead enters Argo from the northeast side of the yard just west of 1st Ave S. onto Argo's east side classification tracks.
- The Harbor Island lead at the northwest end of the facility from the north end classification tracks, track 500, and the locomotive service zone as well as from the wye. The Harbor Island lead crosses under Highway 99 and across Marginal Way past two industries just outside the yard accessed by a street switch. Additionally, a switch just inside Argo yard at the north end leads northward under Highway 99 to the Whatcom Yard situated between Hwy 99 and East Marginal Way S. across from Terminal 30.

Argo yard is an origin and termination point for all UP trains, the locomotive service zone and roundhouse is a very busy and congested area where engines are fueled and serviced, locomotive consists for inbound and outbound trains are built and broken up by roundhouse employees within the roundhouse service zone around the clock seven days a week.

Intermodal loading Ramps 6-8 are used for intermodal containerized freight and are generally pulled and spotted once or twice daily. Ramps 9 and 10 (and often 8) are exclusively used for handling outbound City of Seattle garbage and are generally pulled and spotted twice daily. All productive switching at Argo Yard occurs on the south end, which is also where most departing trains are built. The north-end switching leads at Argo were constructed on a slight grade, as a result, work activities at this location are restricted to slow flat switching operations (“pull and shove rail cars to a stop”) due to safety concerns and the likelihood of rail car rollouts.

30-5
cont.

If the track 101 lead spur were eliminated, it would completely cut off south-end yard access to intermodal loading ramps 6 through 10 to switching crews assigned to work on the high production south-end switching lead at Argo Yard, where most of the car switching activity is performed!

GRAVE SAFETY CONCERNS:

Several years ago, UP obtained access to use a BNSF running track in the rail corridor to the east of Airport Way, as it’s much longer and provides much greater headroom for more efficient switching operations than the 3000-foot long track 101 lead spur. Since the carrier no longer required the use of the 101 lead spur track for ALL south end yard switching 24/7/365, consideration was given to its possible elimination; our organization (I as their representative) was directly involved in analyzing and evaluating the potential impacts of such a closure.

30-6

If the 101 lead spur had been removed from service, pulling and spotting rail cars on intermodal ramps 6-10 would have required very lengthy pulling and shoving movements of approximately half a mile from the north end of Argo yard and required traversing through the Locomotive Service Zone and Roundhouse areas each time, as well as crossing yet another very busy public industrial street to the north via track 500 and the Harbor Island lead (crossing two one-way directional lanes on Marginal Way at the south end of the Highway 99 overpass), that also has no electric crossing warning devices or gates.

Switch crewmembers would have been required to engage in extremely lengthy slow-moving shoving train movements (and pulls) through dangerous congested areas of the yard while having to ride on the sides of rail cars, an average of fourteen times every day.

The only route to access intermodal ramps 6 through 10 from the north end requires very lengthy shoving movements (the most dangerous way of moving trains) traversing eleven yard switches and at least two permanent derails, utilized by three different service crafts (roundhouse, road train service, and yard switching crews), each time movements occurred along the route. Additionally, these shoves would require a crewmember to ride on the side of a rail car to protect the shoving movement, through a very busy semi-tractor-trailer grade crossing of approximately one thousand feet in length built on and around running track 24. It would also have required traversing at least four additional yard and truck grade crossings, one car department workers crossing, as well as the public grade crossings on Marginal Way with two industry rail tracks accessed by a switch in the middle of the street at that intersection just outside the north end of Argo yard.

30-7

The traffic congestion on Marginal Way and adjacent streets has increased greatly as drivers seek alternatives to get through the city since the closure of the West Seattle bridge. This would have also significantly increased rail traffic congestion through the locomotive service zones and the north end of Argo yard and created new safety hazards. The relining of track switches by other crews for their train movements, the very slow 5 mph speed limit in the locomotive service zone, and the competition for use of this small limited area by increased switching movements and train crews, as well as roundhouse employees would have created traffic bottlenecks due to time constraints imposed on each crew’s use.

Employees in both operating and roundhouse crafts would have been rushed to complete their movements and under greatly increased pressure to work quickly and clear up so other waiting crews could move through the locomotive service zone. Increased switching traffic through this area would have only worsened the congestion resulting in more frequent safety lapses, derailments, and accidents, many involving track switches relined for use by other train or switching crews engaged in conflicting train movements, so switches will seldom remain lined up for the movement of a given train for any length of time. Slow speeds, constant stopping, and switch relining would have only added to the pressure on train crews to clear up for other movements. This increased pressure on crews focused on clearing up would have distracted crews from safety-sensitive activities and concerns, and the result would constitute a significant escalation in risk along with possible derailments and unnecessary injuries. Such a scenario was completely avoidable and unnecessary!

30-7
cont.

Were all ramp 6-10 switching movements required to be conducted from the north end, that would result from closing the 101 switching lead spur, would increase risk factors and reduce safety for switching crew exponentially.

DETERMINATION AGAINST ELIMINATION OF TRACK 101 LEAD SPUR:

It was determined after this comprehensive examination that eliminating track 101 only shifts and significantly increases risks while dramatically reducing efficiency. Accessing and switching ramps 6-10 from the south end using the 101 lead is both the safest and most efficient method, the shoving distances are extremely short with minimal track switches to traverse, while crew members riding rail cars during much shorter shoving movements have no public crossings to traverse, no conflicting train movements or congestion, and no need to traverse restricted locomotive service or access zones.

If track 101 had been removed, ramps 6-10 would have become the ONLY working tracks at Argo NOT accessible from both the south and north end.

30-8

It was determined that elimination of the track 101 lead spur would have created an enormous increased risk to the safety of rail crew members and equipment and resulted in significantly more derailments and accidents, as well as greater inefficiency by causing more conflicting train movements, and increased congestion at both ends of Argo Yard as well as in the locomotive service zone. **In summary, Union Pacific determined that abandonment of the track 101 spur would NOT reduce or eliminate risk from current practices; it would only INCREASE AND TRANSFER RISK to other public crossings and onto railroad operating crew employees.**

CONCLUSION:

While the increase in activities occurring as a result of gentrification in the Georgetown Industrial area has taken place over the last two decades, we have not seen any significant increase in rail grade crossing incidents along the Track 101 lead spur. Additionally, while the frequency of use of the 101 lead spur track is much less than when it was previously required for all switching activity at Argo yard, this does not reduce its critical importance to the ongoing safety of switching crews who, by its continued existence, can continue to pull and spot rail cars on Intermodal Ramp Tracks 6 through 10 from the south end of Argo yard.

30-9

Nonetheless, myopic proposals to add 3,784 housing units within the predominantly industrial and commercial triangle between Airport Way S., S. Corson Street, and Bailey Street on the south should be seriously reconsidered; once built the residents would certainly seek a quiet zone along the rail corridor, limiting the use of locomotive horns by train crew members to warn of approaching trains.

The land and structures in the triangle north of Bailey Street are primarily industrial and commercial. Once we lose these industrial areas and businesses, we also lose the solid middle-wage level jobs forever! There are plenty of other lands in the area that can be redeveloped for housing without displacing industrial entities, or encroaching on railroad properties that are critical to the safety of workers. The greatest fear of most rail crew members is injuring or killing members of the public who foul the tracks when trains approach. Moving thousands of families onto new residential units in areas adjacent to this track will result in horrible accidents and the needless deaths of families and children.

30-9
cont.

We strongly oppose the provisions contained in Alternative 3 and Alternative 4 to rezone this limited industrial area and allow the development of such large residential housing within the confines of this location. We urge the City to remove these provisions from the EIS.

Thank you for your review and consideration of our comments.

Sincerely Yours,



Herb Krohn
Washington State Legislative Director
SMART Transportation Division/United Transportation Union

cc: Jim Holmes –Planning and Community Development
Monisha Harrell – Mayor’s Office
John Persak – Office of Economic Development

Holmes, Jim

From: Ted Lehmann <ted@cmsenergyadvisors.com>
Sent: Wednesday, March 02, 2022 9:16 AM
To: Holmes, Jim
Cc: Peter A Nitze
Subject: OPCD March 1, 2022 DEIS Comments
Attachments: OPCD DEIS Comment Letter.pdf

CAUTION: External Email

Jim,

Attached please find Peter and my comments on the current DEIS. Thanks again for keeping us part of the dialogue.

Regards,

Ted and Peter

March 2, 2022

VIA ELECTRONIC MAIL

City of Seattle, OPCD
Attn: Jim Holmes
P.O. Box 94788
Seattle, WA 98124-94788
Jim.Holmes@Seattle.gov

Re: A New Zoning Proposal for SODO

Dear Mr. Holmes,

We both had the privilege of serving on the Mayor's Industrial and Maritime Strategy Council and actively engaged in its lengthy deliberations, particularly with respect to reforming land use in the SODO industrial area. Over the more than 18 months that the Council met, we witnessed the emergence of two dramatically different perspectives: one, expressed primarily by representatives of the Port and ILWU, committed to preserving and further expanding the restrictions on traditional non-industrial/maritime uses throughout the roughly 5,000 acres presently zoned IG1 and IG2; and the other advocating a change to the zoning in a small percentage (5% to 6%) of those lands, concentrated along major commercial thoroughfares and around existing and planned light rail hubs, to permit a broader range of commercial activities and the development of limited workforce housing.

31-1

We strongly support the latter approach, in the belief that it aligns with longstanding trends in the area, and that it would help address a number of challenges facing both the city and the SODO neighborhood. Specifically, this modest change would contribute to alleviating the city-wide shortage of affordable housing, while reducing single-occupancy vehicular congestion by locating residences near public transit; it would provide incentives to developers to permanently remediate environmentally polluted sites, thereby addressing concerns over the health effects of living in these areas; and it would support the creation of new spaces for a more diverse range of businesses, increasing employment density and leading to a more vibrant and secure neighborhood. All of this could be accomplished without impinging on those areas close to the waterfront and heavy rail lines where traditional maritime and industrial businesses continue to operate.

Unfortunately, the effort to reach a reasonable compromise was rejected by the Council on the basis of a "take it or leave it" up-or-down vote on a package of 11 recommendations that included the restrictive land use proposals. If enacted, these proposals will result in no meaningful change to the status quo, with the prospect of a continuing deterioration in environmental conditions, infrastructure, employment, and public health and safety in the majority of the SODO

31-2

neighborhood, and a wasted opportunity to leverage our investment in a world-class light rail system for the benefit of all of our citizens.

As further background, we have summarized the history of past efforts to reform land use in SODO below, highlighting the systemic challenges that show why just hoping for manufacturing to come back to most of Seattle's industrial lands is wishful thinking. As well, we have further fleshed out our alternative approach with a number of specific recommended changes and shared this finding with your Office. We need your leadership to say "No" to the Council's proposals and ask City Hall to expand their EIS study to include greater commercial density and workforce housing and prove that concepts like "Industrial Innovation Zones" even exist elsewhere in this Country.

Thank you very much for your consideration.

Regards,

Theodore S. Lehmann

Ted Lehmann and Peter Nitze



1. Recent history of SODO zoning.

Much of the current zoning in SODO dates back to the Greater Duwamish MIC Plan from 2000 (the "2000 Plan"). The 2000 Plan reinforced the industrial use emphasis in SODO, maintained maximum size-of-use limits for various commercial uses and created the Stadium Transition District Overlay. Despite these protective measures, land prices in SODO continued to escalate in the following years and industrial users continued to depart the area. In 2007, Mayor Nickels proposed to the City Council a tighter set of protections for industrial uses in SODO, principally a series of significant reductions in the maximum size-of-use limits for commercial uses. These amendments were adopted in December 2007 (the "2007 Downzone") and remain in effect today. For example, the 2007 Downzone reduced the per-lot office allowance in SODO to 25,000 s.f. or 10,000 s.f., depending upon the zone. Even stricter restrictions were adopted for retail, restaurant and entertainment uses. Once again, despite these protective measures, land values continued to rise and the departure of prior industrial users continued, although a new group of small-scale "maker space" users did enter the scene.

Following 2007, the City and the Planning Commission conducted various studies of SODO zoning, but no major changes were proposed as a result. In 2015, Mayor Murray convened the 2015 Task Force, which had drafted a series of recommendations by late 2017. Those recommendations were never finalized.

31-2
cont.

31-3

2. The Challenges in SODO

As an area, SODO is beset by a constellation of challenges, which together have prevented its development for any uses in the last several decades. These challenges are chronic and are only worsening over time.

- a. Escalating land value. For more than two decades, land values in SODO have escalated substantially, in spite of increasing protective and restrictive zoning regimes. These increases reflect the market’s assessment that the industrial uses promoted by current zoning are not feasible in the medium- to long-term. Even the much tougher restrictions incorporated in the 2007 Downzone did not stem the tide of escalating land prices in SODO. Increasing land values increase the property tax burden on existing owners and place substantial upward pressure on industrial rents, which have combined to continue the exodus of historic industrial users from SODO. Smaller scale “maker space” users have entered the market in a nominal way, since their space requirements (and thus, rent burden) are significantly smaller. There is no indication that this long-term trend of escalating land values will abate, and in fact, for reasons discussed below, it may only increase further in the years ahead.
- b. Sites not conducive to large-scale industrial uses. Historic industrial uses in SODO were relatively land-consumptive, utilizing large building spaces and large exterior areas for truck yards, storage and staging. But in the last several decades, the trend toward larger industrial facilities has only intensified, and users of scale have departed SODO for the much larger sites available in South King County, Pierce County and points further south. Today, the lot and block pattern in SODO cannot support significant industrial users of this era; thus, the only real growth in industrial demand in SODO has been in small-scale spaces in recent years.
- c. Existing land uses in SODO are predominantly non-industrial. Most land uses in SODO today are not industrial uses. These include:
 - i. Public uses (Metro/Sound Transit/City)
 - ii. Office uses (Starbucks/School District)
 - iii. 1st Avenue corridor (home furnishings/apparel/clubs)
 - iv. 4th Avenue corridor (fast food/retail)
 - v. Heavy commercial uses (many existing uses in SODO are not truly “industrial” uses, but rather commercial and heavy commercial uses, which can locate in commercial zones in the City)

The growth of these non-industrial uses over the last few decades has continued to crowd out existing industrial uses, despite the intervention of strict new zoning controls. As noted, some new industrial uses in SODO are smaller-scale “maker” type uses

- d. Congestion. While north/south corridors in SODO provide good accessibility, the area suffers from the lack of good east/west connectivity. The dramatic increase in train traffic through SODO in the last decade has significantly impacted the operations of at-grade crossings. The new Lander Street bridge will help address this issue, but continued deterioration at other at-grade crossings will simply put more pressure on this connection. In addition, the lack of adequate street infrastructure in SODO results in continuing conflicts between bicyclists and freight and vehicular movement through the area. 31-5
- e. Environmental conditions. The presence of soil and groundwater contamination throughout areas of SODO is well-documented, and can impose extraordinary costs on new development. The smaller-scale industrial users that more commonly frequent SODO today cannot economically support solutions to any of these issues. In addition, stormwater collection and treatment are issues of increasing focus in SODO. Again, potential industrial use in the area cannot attract the level of capital necessary to address any of these issues. 31-6
- f. Soil conditions: Recently, the Seattle Department of Construction and Inspections (SDCI) has embraced stricter standards for ground improvement and foundation systems in the liquefiable soils of SODO. The significant costs of these below-grade improvements cannot be underwritten by industrial development; thus, these new standards will effectively preclude new ground-up industrial development. In order to attract the level of capital necessary to undertake such improvements, greater density of higher-value uses like office and research and development would be required. 31-7
- g. Unreinforced masonry buildings. SODO is home to a significant proportion of the unreinforced masonry buildings in the City of Seattle. But given the relative unavailability of capital for development, the likelihood of remedial work being feasible in the current environment is small. 31-8
- h. Failure to capitalize on light rail. SODO has as many light rail stations today as South Lake Union will have in 2035. But current zoning restrictions prevent the area from capitalizing on this enormous regional investment in high-capacity rail transit. 31-9
- i. Inability to attract capital investment. Long-standing protective zoning precludes uses and development that can support new capital investment in SODO. As a result, the market will not make funding available to address any of the challenges in SODO and the area will continue its decades-long pattern of being starved of private capital. 31-10

3. The Challenges and Opportunity for the Region

In addition to the challenges that are unique to SODO, the larger region faces critical issues regarding employment growth and optimal light rail usage. SODO's location adjacent to the Center City also provides it an opportunity to play a role in resolving these issues.

- a. Lack of new office sites in Center City Seattle. Seattle's Comprehensive Plan targets tens of thousands of new jobs in the Center City over the next twenty years, and Sound Transit is doubling down on the Center City as the hub of its expanding regional light rail network, with plans to add a new Downtown tunnel and several new stations over the next 15 years – at a cost of billions of dollars. Unfortunately, the inventory of available sites in the Center City large enough to host a new office development is dwindling to almost none. Due to floorplate requirements, an office development site requires at least 25,000 s.f. of area, and today almost all of the redevelopable sites of this size are spoken for. By 2026, when this current pipeline of projects completes delivery, there will be virtually no inventory of suitable office sites in the Center City.

31-11

Bellevue will be more than happy to make up for this future shortfall, but our regional rail strategy and the City's own Comprehensive Plan are predicated on continued employment growth Downtown. SODO is the only direction this growth can occur, and the area is already served by light rail – service that will only improve by 2035.

- b. Challenges for regional light rail. As noted, Sound Transit building a \$50+ billion regional light rail system based around an employment hub in Center City Seattle that will soon be maxed out.
- c. These challenges also create a unique opportunity in SODO. While SODO has its own challenges, it is also uniquely located to play a role in resolving some of the regional problems noted above.

4. The Future of SODO

The 2007 Downzone and other protective zoning measures adopted in the past have done nothing to restore significant industrial use in SODO. In truth, these actions have just created a “holding zone” in SODO to prevent capital investment. With commercial FARs remaining so low, there will be little reinvestment in the area and SODO will continue to sit underutilized, its challenges unaddressed.

31-12

Importantly, these circumstances will attract to SODO uses that do not depend upon capital investment, such as last-mile delivery services. Given its proximity to Downtown and other urban centers, SODO is well-positioned to grow in the future as a headquarters for vehicle delivery services. Ironically, the protective zoning measures

designed to save industrial uses now only makes SODO attractive for existing non-industrial uses and jobs for delivery drivers.

This likely future for SODO will see little new capital investment, a continuation of the long-standing challenges besetting the area, a persistent increase in land values and ongoing underutilization of light-rail infrastructure.

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cont.

5. A New Zoning Proposal for SODO

The 2015 Task Force was unique in that it confronted many of these issues and considered an alternate course for the future of SODO. This approach was not oppositional and restrictive, but instead considered a structure in which uses became interdependent, capital investment could be attracted and steps could be taken to address SODO's chronic challenges. What follows is an updated version of this concept.

- a. Develop a new zoning overlay for SODO. Keep the present industrial zoning, but impose an overlay on all of SODO from the sports stadiums to Spokane Street. Under the overlay, projects that qualified under certain criteria could achieve greater office density.
- b. Use & Density: Allow up to 6 FAR of commercial office use on a site, as long as the site includes 1 FAR of industrial uses. Industrial uses would include maker space, breweries, R&D, high-tech assembly, small-scale manufacture and the like. Maintain limits on retail use to prevent destination or large-scale retail. This structure will ensure the capital investment necessary for new development in SODO and will require new office development to protect and support on-site industrial uses over the long-term.
- c. FAR Bonus: Charge bonus fees for office FAR, dedicated as follows:
 - i. Affordable Housing: 25% to support production of affordable housing in appropriate locations in the City
 - ii. Freight & Bicycle Mobility: 25% to support capital improvements to enhance freight mobility and bicycle connections through SODO
 - iii. URM Buildings: 25% to create a fund for loans and grants to support retrofit of unreinforced masonry buildings in SODO
 - iv. Environmental: 25% to create a fund for loans and grants for site remediation and stormwater treatment

31-13

Preliminary estimates prepared by City staff for the 2015 Task Force indicated that such a bonus program could raise hundreds of millions of dollars in the decades ahead.

- d. Transportation Management: In the past decade, the marginal SOV rate for the 60,000+ new jobs added Downtown has been a mere 10%. New office

development in SODO would be subject to strict TMP controls to ensure similar performance. Local shuttle service and enhanced Metro service could connect employees to light rail stations and the Center City.

- e. Maritime Uses: The Port of Seattle is pursuing its own long-term plans for its maritime properties. This overlay would not apply to Port properties.
- f. Residential Uses: Portions of SODO could be appropriate for workforce housing and other residential uses, and there are examples around the world of peaceful coexistence between industrial and residential uses. But the 2015 Task Force did not address this issue. Given the urgent need for affordable housing in our City, the emphasis on transit-oriented development, and the presence of two light rail stations in SODO, land around those two stations should include housing. We all benefit when people live near their work and don't have to rely on single occupancy cars for transport. Allowing true mixed-use development would also help deter future erosion in the city's tax base from the relocation of businesses to other areas.

31-13
cont.

6. Conclusion.

The recent history of zoning in SODO has been predicated on maintaining opposition between commercial and industrial uses. But while policy decisions have consistently favored industrial uses, the last several decades of protective zoning have done nothing to preserve industrial uses. Instead, these measures have only succeeded in starving SODO of new capital investment. The key to a real future in SODO is to attract capital investment that will support long-term industrial uses, while at the same time help to address the challenges of the area. The need for more employment space in the larger Center City and the continuing investment by Sound Transit in light rail together create a singular opportunity: to marry housing use, office use, and industrial use in a way that can promote a path to address the infrastructure deficiencies in SODO that have been ignored for so long. Simply put, capital starvation in SODO is a failed strategy. It is time to put capital to work.

31-14

Signature:

Email: peter.nitze@nsco.com

Holmes, Jim

From: Ted Lehmann <ted@cmsenergyadvisors.com>
Sent: Wednesday, February 23, 2022 10:45 AM
To: Wentlandt, Geoffrey; Holmes, Jim
Cc: Peter A Nitze; McCullough, Jack
Subject: MIC Industrial Land Comments
Attachments: CAI Model comments v1.docx

CAUTION: External Email

Geoff and Jim,

The comment period deadline for the Industrial Lands DEIS is fast approaching and we would like our comments to include the economic work produced by CAI and your Team, with the input from our group. Is there an updated 'public' version that you can send over, and was CAI able to incorporate any of the changes we suggested in our email of January 28? This data is critically important in informing our response to the DEIS.

Further, we are not alone in believing that a robust economic analysis of the proposed land use concepts is vital to assessing their feasibility as can be seen in this excerpt from the draft letter produced by the Seattle Planning Commission, which states:

"The EIS should clearly document economic impacts such as demand for industrial property, square footage rents, and projected vacancy rates.

The Planning Commission suggests seeking input from industrial stakeholders for this analysis, rather than rely on data generated by City staff or its consultants (emphasis added)....

While we understand that economic analysis may be beyond the scope of the EIS, we strongly encourage this analysis to fully understand the implications of these land use concepts, to compare the Action Alternatives, and to inform the final policy decisions."

We believe that our collaboration to date has addressed some of the above requests, but still has a long way to go to be fully fleshed out. We would strongly support a more detailed economic analysis, including examination of additional prototypes, either in the next phase or through an extension to the DEIS process to continue helping you and the City of Seattle develop more detailed answers to these questions.

Finally, we've made some minor changes to our earlier comments based on additional feedback from additional developers. Please see attached.

Thanks,

Ted Lehmann
Peter Nitze
Jack McCullough

31-15

Holmes, Jim

From: Laura Loe <lauraloe@sharethecities.org>
Sent: Wednesday, March 02, 2022 3:37 PM
To: PCD_Industry_And_Maritime_Strategy
Cc: Wentlandt, Geoffrey; Holmes, Jim
Subject: Draft Environmental Impact Statement (EIS) for Seattle’s Industrial and Maritime Strategy - Share The Cities Action Fund DEIS Comments
Attachments: Share The Cites March 2 DEIS comments.pdf

CAUTION: External Email

These comments are submitted by Laura Loe, Share The Cities Action Fund's Executive Director on behalf of our whole organization.

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for Seattle’s Industrial and Maritime Strategy.

Share The Cities would like to specifically appreciate the work of [Ray Dubicki](#) who has offered extensive volunteer support for our work to understand and respond to the DEIS.

We want to emphasize our support for engagement events and materials for non-English speaking residents brought to our attention by [Duwamish River Community Coalition](#).

32-1

Please amend the Draft Environmental Impact Statement to address the following issues:

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-
- Engage communities to more clearly explain the purpose of this EIS, the difference between the
- proposed zones and the Alternatives, and the legislative steps yet to come; (See below for expanded thoughts on this)
-
-
- Address small business displacement fears since much of the environmental improvements expected
- under these new zones are reliant on new construction whose rents may be out of reach for tenant businesses
-

32-2

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-
- Emphasize a greater partnership with Indigenous communities and Indigenous sovereignty
-
-
-
- Present a clear path to support daily air monitoring in Ballard - Interbay
-
-
-
- Prioritize dramatic visual cues in built environment to get people who are driving vehicles to slow down on major arterials and urban freeways, like 15th Avenue NW
-
-
-
- Address the power and values imbalance created by the freight lobby's political pressure which causes an overemphasis on freight in decision making
-
-
-
- Highlight the unique importance of Ballard-Interbay as a freshwater harbor which allows shipping
- fleets less destructive port environment for docking and repair of their ships
-
-
-
- Highlight BNSF's historic and continuing lack of transparency and accountability
-
-
-
- Clarify which existing and proposed uses in the industrial areas will be considered nonconforming
- under the MML, II, and UI zones; Provide a comprehensive list of uses with active exemptions or that operate under amended development standards. (i.e. Storm practice facility)
-
-
-
- Clarify the definition of "industry supportive housing," provide examples from other locations of mixed use housing/industrial, and propose thresholds for mixed use buildings
-
-
-
- Develop a complete list of the neighborhood-level comprehensive plan recommendations in areas that
- will be impacted by these zoning changes, and analyze whether they conform or contradict the Draft Comprehensive Plan Goal and Policy Language found in Appendix D
-
-
-
- Specify which groups of zoning changes within each alternative should be treated as divisible or

32-2
cont.

- as a cluster/group and describe why. (i.e. what are the issues with splitting Ballard Brewery District between UI and MML?)
-
-
-
- Add documentation, analysis, and maps that connect Seattle’s historic segregation, redlining and exclusion to the present day location of industrial uses.
-
-
-
- Complete a city-wide analysis of zoning that looks specifically at the ways commercial and multi-family exclusions in other parts of the city lead to the competition for industrial land. Use maps of the entire city.
-
-
-
- Examine which recommendations and boundaries are carried over from older plans that have never been vetted for equity or impact, including transportation and public facilities.
-

32-2
cont.

We would also like to direct you and Seattle residents to examine the comments submitted by the following organizations: Duwamish River Community Coalition, Seattle Cruise Control, and the Georgetown/South Park Advisory Group. Each of their perspectives is valuable, since we have primarily focused on Ballard-Interbay.

In these comments, we want to emphasize the importance of additional scrutiny regarding the impacts of the systemic racist policies that created Seattle’s industrial land and exacerbated the disparate impacts of pollution and disinvestment on nearby underserved neighborhoods of color.

32-3

The idea to rezone the city’s industrial lands is a good one. However, the impacts listed in the draft EIS are not addressed by the mitigations proposed. There is a disconnection between the greenhouse gasses, soil contamination, and water pollution created by the city’s industrial zones and their area of impact. That is because the underlying boundaries used to create the EIS study area and subareas are relics of inequities the EIS purports to address. The Environmental Impact Statement must struggle with the racialized history that formed our industrial areas in the first place.

I. Comments on the proposed zones.

Seattle’s existing industrial zoning designations are failing. The General Industrial zones are worded so broadly that grocery stores and mini-storage proliferate instead of employers who manufacture things. Car-intensive commercial uses are taking up space next to ports, rail, and vital infrastructure that cannot be moved or replaced.

32-4

The three proposed industrial zoning designations appear to recognize the changing needs of industry and its employment role. However, the actual text of the zones is not included in the document. These comments look to add information to the EIS in order to steer the creation of the zones during the legislative process.

- A.
- B.
- C. Manufacturing, Maritime, and Logistics (MML) zone will replace most of the
- D. current general industrial zoning. As such, the EIS should be more explicit on which uses will become nonconforming uses. Not all commercial uses are unwelcome in industrial zones. Additionally, recent exceptions have been granted for developments such as
- E. the WNBA Storm practice facility. In lieu of extending an exemption and adding text to the hefty zoning ordinance, the code should be written to accommodate such uses. A comprehensive list of uses with active exemptions should appear in the EIS.
- F.
- G.
- H.
- I. The Urban Industrial (UI) zone will be established at the boundaries between
- J. industrial areas and urban villages. As discussed further below, Urban Villages are separated from waterways by industrial land. That would make some of the UI zoned properties the most desirable locations in the city for new homes, particularly penthouse
- K. units on top of a quasi-industrial space. This would accelerate issues of pricing out legacy industry in neighborhoods where that is already most acute. The EIS should be clearer on the definition of "industry supportive housing," provide examples from other
- L. locations of housing on top of industry, and propose thresholds for mixed use buildings.
- M.
- N.
- O.
- P. Industrial Innovation (II) zones are for areas around transportation hubs where
- Q. office and manufacturing can coexist with transit. We find this zone very exciting with mixed uses between industrial and commercial as well as specifically stated support for pedestrian and cycling infrastructure. However, the current neighborhood plans and
- R. Comprehensive Plan have multiple provisions to separate bike and ped paths from industrial areas. The EIS does not examine where the II zone expressly contradicts existing neighborhood plans. Proposed changes to the Comprehensive Plan do not specifically address
- S. this issue. More broadly, the EIS should develop a complete list of the neighborhood-level comprehensive plan recommendations impacted by these zoning changes and analyze whether they conform or contradict the Draft Comprehensive Plan Goal and Policy Language

32-4
cont.

32-5

T. found in Appendix D.

U.

II. Comments on the proposed Alternatives.

In discussing the EIS publicly, we have found many Seattleites are confused, including many in Share The Cities, that the three alternatives EIS are not aligned with three new zoning designations. The EIS Alternatives examine how much the new zones will be laid out across the city's existing industrial areas. We agree that this is a smart way of setting up the EIS because it focuses the discussion on specific locations rather than ephemeral concepts in zoning. But the document can be clearer about the distinction.

We support Alternative 4 - The Future of Industry Expanded, only because there are no alternatives that more liberally use the UI and II zones across larger portions of the city. With time, we look for those zones to be used outside of the narrow boundaries of this EIS.

32-6

As the City Council moves to adopt the new industrial zones and the accompanying zoning map, they will be able to pick and choose between parts of the Alternatives. That means the boundaries can end up erratic and narrow due to legislative horse trading. The EIS must do a better job establishing why areas change under each of these Alternatives, and which areas should be treated as a cohesive cluster.

At the neighborhood level, the proposed maps do not offer a picture of cohesiveness. Besides raw acreage or numbers of houses, what does it mean if blocks are divided? Ballard's Brewery District is a good example. It's the area north of Leary Avenue on either side of 14th Avenue. Alternative 2 puts it in MML, Alternative 3 in Urban Industrial, and Alternative 4 sets it as Industry and Innovation. But the legislative process can split that apart. The EIS does not strongly justify what, if anything, is keeping these clusters together. (It should be kept together.)

Speaking of splitting the baby, it must be said that Alternative 1 should be considered a non-starter in its entirety. Even a compromise where some of the current industrial zones are maintained in certain areas should be dismissed completely. The current zoning ordinance is 1,400 unreadable pages. Adding a couple hundred more for new zones without removing any of the existing would be idiotic. The EIS should reflect

III.

Comments on boundaries.

While the proposed EIS Alternatives offer needed updates to industrial and manufacturing centers, they are stuffed within the existing boundaries of the current industrial zones. And that is the source of a much deeper problem. The city's industrial boundaries themselves carry the history of segregation that cannot be washed away with a cursory equity analysis.

32-7

This issue was brought up in scoping. In Appendix A, the EIS drafters respond to scoping comments that requested including an overview of historic land use actions by saying “The EIS will include a review of past plans and policies...Mitigation measures that further equity and environmental justice can be linked to this objective.” (Scoping Report 4) In response to the request that the scoping include more area than just the existing industrial areas, the EIS states: “The City of Seattle, as the Lead Agency, has the prerogative to define the range of alternatives it studies in the EIS.” (Scoping Report 7)

SDCI staff and consultants have made an extensive analysis of Seattle’s industrial areas across 14 different categories, including land use, public services, geology, and noise. Each of these sections deep dives into the topic and compares possible impacts of each alternative.

But the EIS doesn’t tell the story of how these industrial zones came to exist in their current locations. Take this paragraph from the Land Use section:

32-8

“Historical land use decisions also led to the location of multi-family housing in areas bordering industrial lands that caused environmental justice harms. Seattle’s first zoning ordinance in 1923 and its major update in 1956 located multi-family residential districts at the edges of rail lines, industrial districts, and manufacturing districts. Relatively less affluent renters were exposed to noise and air quality and other impacts, while single family districts removed from the edges of industrial areas were not. The continued pattern of multi-family housing and zoning districts bordering MICs. Continues to be evident today in areas including Interbay and the northeast edge of Ballard.” (DEIS 3-241)

While accurate, this obscures two important facts. First, not only were apartments located near industrial areas, but both industrial and multi-family uses were **excluded** from a vast majority of the city. Second, the pattern is not just evident today. It is our city’s current policy.

Between racially restrictive covenants and apartment bans written into zoning, multifamily housing was actively pushed out of many Seattle neighborhoods. Exclusion from the remaining city is important in understanding the issues that the EIS is trying to address. The document lists six emerging factors affecting industrial lands:

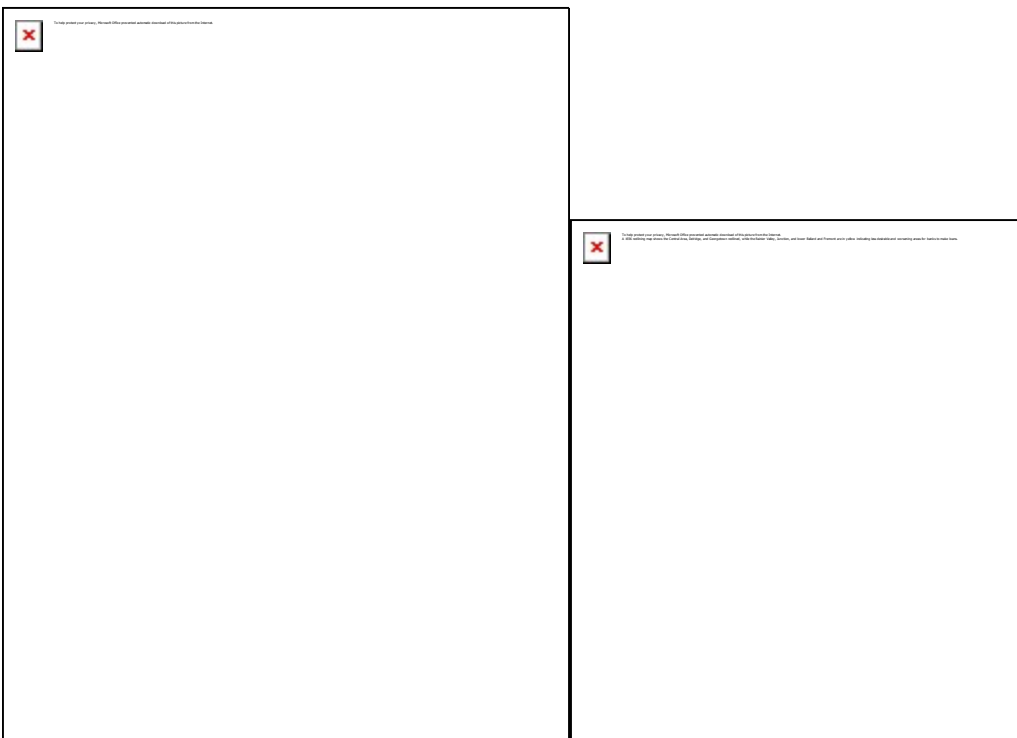
-
-
- Pressures to convert industrial lands
-
-
- Emerging technologies and processes
-
-
- Unintended development
-
-
-

- Pending port, transportation, and new industrial building typology
-
-
- Environment and climate change
-
-
-
- Equity and accessibility
-

32-8
cont.

Three of these – conversion pressures, unintended development, and equity – are directly tied to forcing apartments and shops and factories to compete over a small portion of the city’s land. The fourth, Environment and Climate Change, is deeply tied to how pollution is concentrated in small areas and poisoning neighboring communities of color. There is not a map of the entire city in the EIS. They all cut off just above Greenlake. This is a city-wide rezoning of industrial lands, yet it does not show the whole city. It is impossible to develop policies that address land use and zoning issues without once mentioning the other side of the story – the portion of the city devoted exclusively to single-family housing.

More broadly, the EIS mentions patterns of exclusion and redlining as if they happened in the past. Exclusion and redlining are current issues supported by current policy. In Exhibit 3.8-2, the EIS did an amazing thing by combining the Urban Villages map with the Industrial Centers map, two that are not normally put together. They show that density never touches water, only industrial waterfront. Beaches are reserved for Seattle’s homeowners.



Examining Exhibit 3.8-2 (left above) side-by-side with the 1930's Home Ownership Lending Corporation map (right above) that established mortgage patterns which "redlined" communities of color shows that nothing has changed in 100 years of Seattle's zoning. Industrial and downtown neighborhoods are left unshaded. "Undesirable" neighborhoods, still the city's most diverse, were in red. The boundaries of the industrial zones and urban villages are the same lines that separated White mortgagees from Black and industrial neighborhoods in the 1930s. (HOLC map from The Seattle Civil Rights and Labor History Project, University of Washington)

In the Seattle 2035 Comprehensive Plan from 2015, the Urban Village strategy is described as "places that **already have** active business districts and concentrations of housing" (Seattle 2035 10, emphasis added). This continued the Urban Village concept that was adopted in the 1994 comprehensive plan, where the first goal was to "Maintain and enhance Seattle's character" which it started to define as "large single family areas of detached houses." (Toward a Sustainable Seattle 5) That plan never once mentioned how many of those single family neighborhoods had restrictive covenants written into their deeds. The comprehensive plans did not break any barriers, they reinforced them and continue as the basis for zoning we have today. The EIS states "since MICs were established in 1994, there have not been large-scale alterations to their geographic boundaries" (DEIS 1-6) That same recognition can go back to the HOLC maps decades earlier.

The EIS struggles to explain how new zones will overcome the disparate impacts to communities burdened by the impacts of industry. As extensively documented by the Duwamish River Community Coalition in their comments, many of the EIS mitigation measures come down to "new zones will prompt construction of new buildings that will be better." No matter how good a new building is, it cannot surpass the boundaries it is dropped into. And those boundaries have remained unchanged for 100 years. The industrial boundaries are steeped in systemic racism and continued by this Industrial and Maritime Strategy. The city is once again specifying factories and manufacturers are only allowed in certain areas that are next to communities of color. The boundaries are the segregation. This EIS maintains each and every one of them.

32-9

And that's the reason it's vitally important that this story be told within this EIS. There are 100 years of policies squeezed between that first Seattle zoning code in 1923 and today. Each one builds upon the last. Unquestioningly carrying forward the framework of racial segregation and exclusion from one copy to another is just putting a new book cover on the same redlining manual. This EIS fails to recognize that chain, much less break it.

It is indeed the city's prerogative, as the Lead Agency, to define the range of alternatives it studies in the EIS. But that is exactly the same prerogative it has used to segregate and redline for the last century. While this EIS cannot single-handedly undo that damage, it can make some steps in the right direction:

- 1.
- 2.
3. Add documentation, analysis, and maps that connect Seattle's historic segregation, redlining, and
4. exclusion to the present day location of industrial uses.
- 5.
- 6.
- 7.

8. Complete a city-wide analysis of zoning that looks specifically at the ways commercial and multi-family
9. exclusions in other parts of the city lead to the competition for industrial land. Use maps of the entire city.
- 10.
- 11.
- 12.

13. Examine which recommendations and boundaries are carried over from older plans that have never

14. been vetted for equity or impact, including transportation and public facilities.

- 15.

32-9
cont.

IV. Conclusion and Summary of Comments

These comments are not offered to summarily reject or undermine the Industrial and Maritime Strategy or the draft EIS. As said, the proposal to update the city's industrial zoning is good. The proposed zones have a lot of potential to reflect the new realities of manufacturing. They offer a chance for employers to be participants in the neighborhoods rather than kept segregated and apart. We look forward to making further comments during the legislative process to draft and locate the zones in order to prevent petty, classist, or biased exceptions. But the proposal is strong and having it on the table is a massive step forward.

32-10

However, the EIS is missing any recognition that the lines themselves are part of the issue. These historical boundaries made their own problems, and we are left to unquestioningly continue being constrained within them. To address the impacts of the Seattle Industrial and Maritime Strategy, the Environmental Impact Statement must make robust efforts to understand history and the sources of inequity in shaping land use decisions. Without those components, the mitigations proposed are simply inadequate, and the City will set itself up for unlimited challenges as it moves ahead with this rezoning and the coming 2024 Comprehensive Plan.

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for Seattle's Industrial and Maritime Strategy.

Share The Cities would like to specifically appreciate the work of [Ray Dubicki](#) who has offered extensive volunteer support for our work to understand and respond to the DEIS.

We want to emphasize our support for engagement events and materials for non-English speaking residents brought to our attention by [Duwamish River Community Coalition](#).

Please amend the Draft Environmental Impact Statement to address the following issues:

- Engage communities to more clearly explain the purpose of this EIS, the difference between the proposed zones and the Alternatives, and the legislative steps yet to come; (See below for expanded thoughts on this)
- Address small business displacement fears since much of the environmental improvements expected under these new zones are reliant on new construction whose rents may be out of reach for tenant businesses
- Emphasize a greater partnership with Indigenous communities and Indigenous sovereignty
- Present a clear path to support daily air monitoring in Ballard - Interbay
- Prioritize dramatic visual cues in built environment to get people who are driving vehicles to slow down on major arterials and urban freeways, like 15th Avenue NW
- Address the power and values imbalance created by the freight lobby's political pressure which causes an overemphasis on freight in decision making
- Highlight the unique importance of Ballard-Interbay as a freshwater harbor which allows shipping fleets less destructive port environment for docking and repair of their ships
- Highlight BNSF's historic and continuing lack of transparency and accountability

- Clarify which existing and proposed uses in the industrial areas will be considered nonconforming under the MML, II, and UI zones; Provide a comprehensive list of uses with active exemptions or that operate under amended development standards. (i.e. Storm practice facility)
- Clarify the definition of “industry supportive housing,” provide examples from other locations of mixed use housing/industrial, and propose thresholds for mixed use buildings
- Develop a complete list of the neighborhood-level comprehensive plan recommendations in areas that will be impacted by these zoning changes, and analyze whether they conform or contradict the Draft Comprehensive Plan Goal and Policy Language found in Appendix D
- Specify which groups of zoning changes within each alternative should be treated as divisible or as a cluster/group and describe why. (i.e. what are the issues with splitting Ballard Brewery District between UI and MML?)
- Add documentation, analysis, and maps that connect Seattle’s historic segregation, redlining, and exclusion to the present day location of industrial uses.
- Complete a city-wide analysis of zoning that looks specifically at the ways commercial and multi-family exclusions in other parts of the city lead to the competition for industrial land. Use maps of the entire city.
- Examine which recommendations and boundaries are carried over from older plans that have never been vetted for equity or impact, including transportation and public facilities.

We would also like to direct you and Seattle residents to examine the comments submitted by the following organizations: Duwamish River Community Coalition, Seattle Cruise Control, and the Georgetown/South Park Advisory Group. Each of their perspectives is valuable, since we have primarily focused on Ballard-Interbay.

In these comments, we want to emphasize the importance of additional scrutiny regarding the impacts of the systemic racist policies that created Seattle's industrial land and exacerbated the disparate impacts of pollution and disinvestment on nearby underserved neighborhoods of color.

The idea to rezone the city's industrial lands is a good one. However, the impacts listed in the draft EIS are not addressed by the mitigations proposed. There is a disconnection between the greenhouse gasses, soil contamination, and water pollution created by the city's industrial zones and their area of impact. That is because the underlying boundaries used to create the EIS study area and subareas are relics of inequities the EIS purports to address. The Environmental Impact Statement must struggle with the racialized history that formed our industrial areas in the first place.

I. Comments on the proposed zones.

Seattle's existing industrial zoning designations are failing. The General Industrial zones are worded so broadly that grocery stores and mini-storage proliferate instead of employers who manufacture things. Car-intensive commercial uses are taking up space next to ports, rail, and vital infrastructure that cannot be moved or replaced.

The three proposed industrial zoning designations appear to recognize the changing needs of industry and its employment role. However, the actual text of the zones is not included in the document. These comments look to add information to the EIS in order to steer the creation of the zones during the legislative process.

- A. Manufacturing, Maritime, and Logistics (MML) zone will replace most of the current general industrial zoning. As such, the EIS should be more explicit on which uses will become nonconforming uses. Not all commercial uses are unwelcome in industrial zones. Additionally, recent exceptions have been granted for

developments such as the WNBA Storm practice facility. In lieu of extending an exemption and adding text to the hefty zoning ordinance, the code should be written to accommodate such uses. A comprehensive list of uses with active exemptions should appear in the EIS.

- B. The Urban Industrial (UI) zone will be established at the boundaries between industrial areas and urban villages. As discussed further below, Urban Villages are separated from waterways by industrial land. That would make some of the UI zoned properties the most desirable locations in the city for new homes, particularly penthouse units on top of a quasi-industrial space. This would accelerate issues of pricing out legacy industry in neighborhoods where that is already most acute. The EIS should be clearer on the definition of “industry supportive housing,” provide examples from other locations of housing on top of industry, and propose thresholds for mixed use buildings.
- C. Industrial Innovation (II) zones are for areas around transportation hubs where office and manufacturing can coexist with transit. We find this zone very exciting with mixed uses between industrial and commercial as well as specifically stated support for pedestrian and cycling infrastructure. However, the current neighborhood plans and Comprehensive Plan have multiple provisions to separate bike and ped paths from industrial areas. The EIS does not examine where the II zone expressly contradicts existing neighborhood plans. Proposed changes to the Comprehensive Plan do not specifically address this issue. More broadly, the EIS should develop a complete list of the neighborhood-level comprehensive plan recommendations impacted by these zoning changes and analyze whether they conform or contradict the Draft Comprehensive Plan Goal and Policy Language found in Appendix D.

II. Comments on the proposed Alternatives.

In discussing the EIS publicly, we have found many Seattleites are confused, including many in Share The Cities, that the three alternatives EIS are not aligned with three new zoning

designations. The EIS Alternatives examine how much the new zones will be laid out across the city's existing industrial areas. We agree that this is a smart way of setting up the EIS because it focuses the discussion on specific locations rather than ephemeral concepts in zoning. But the document can be clearer about the distinction.

We support Alternative 4 - The Future of Industry Expanded, only because there are no alternatives that more liberally use the UI and II zones across larger portions of the city. With time, we look for those zones to be used outside of the narrow boundaries of this EIS.

As the City Council moves to adopt the new industrial zones and the accompanying zoning map, they will be able to pick and choose between parts of the Alternatives. That means the boundaries can end up erratic and narrow due to legislative horse trading. The EIS must do a better job establishing why areas change under each of these Alternatives, and which areas should be treated as a cohesive cluster.

At the neighborhood level, the proposed maps do not offer a picture of cohesiveness. Besides raw acreage or numbers of houses, what does it mean if blocks are divided? Ballard's Brewery District is a good example. It's the area north of Leary Avenue on either side of 14th Avenue. Alternative 2 puts it in MML, Alternative 3 in Urban Industrial, and Alternative 4 sets it as Industry and Innovation. But the legislative process can split that apart. The EIS does not strongly justify what, if anything, is keeping these clusters together. (It should be kept together.)

Speaking of splitting the baby, it must be said that Alternative 1 should be considered a non-starter in its entirety. Even a compromise where some of the current industrial zones are maintained in certain areas should be dismissed completely. The current zoning ordinance is 1,400 unreadable pages. Adding a couple hundred more for new zones without removing any of the existing would be idiotic. The EIS should reflect

III. Comments on boundaries.

While the proposed EIS Alternatives offer needed updates to industrial and manufacturing centers, they are stuffed within the existing boundaries of the current industrial zones. And that is the source of a much deeper problem. The city's industrial boundaries themselves carry the history of segregation that cannot be washed away with a cursory equity analysis.

This issue was brought up in scoping. In Appendix A, the EIS drafters respond to scoping comments that requested including an overview of historic land use actions by saying "The EIS will include a review of past plans and policies...Mitigation measures that further equity and environmental justice can be linked to this objective." (Scoping Report 4) In response to the request that the scoping include more area than just the existing industrial areas, the EIS states: "The City of Seattle, as the Lead Agency, has the prerogative to define the range of alternatives it studies in the EIS." (Scoping Report 7)

SDCI staff and consultants have made an extensive analysis of Seattle's industrial areas across 14 different categories, including land use, public services, geology, and noise. Each of these sections deep dives into the topic and compares possible impacts of each alternative.

But the EIS doesn't tell the story of how these industrial zones came to exist in their current locations. Take this paragraph from the Land Use section:

"Historical land use decisions also led to the location of multi-family housing in areas bordering industrial lands that caused environmental justice harms. Seattle's first zoning ordinance in 1923 and its major update in 1956 located multi-family residential districts at the edges of rail lines, industrial districts, and manufacturing districts. Relatively less affluent renters were exposed to noise and air quality and other impacts, while single family districts removed from the edges of industrial areas were not. The continued

pattern of multi-family housing and zoning districts bordering MICs. Continues to be evident today in areas including Interbay and the northeast edge of Ballard.” (DEIS 3-241)

While accurate, this obscures two important facts. First, not only were apartments located near industrial areas, but both industrial and multi-family uses were **excluded** from a vast majority of the city. Second, the pattern is not just evident today. It is our city’s current policy.

Between racially restrictive covenants and apartment bans written into zoning, multifamily housing was actively pushed out of many Seattle neighborhoods. Exclusion from the remaining city is important in understanding the issues that the EIS is trying to address.

The document lists six emerging factors affecting industrial lands:

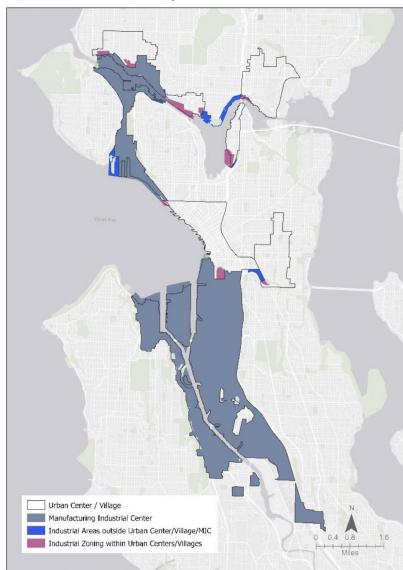
- Pressures to convert industrial lands
- Emerging technologies and processes
- Unintended development
- Pending port, transportation, and new industrial building typology
- Environment and climate change
- Equity and accessibility

Three of these – conversion pressures, unintended development, and equity – are directly tied to forcing apartments and shops and factories to compete over a small portion of the city’s land. The fourth, Environment and Climate Change, is deeply tied to how pollution is concentrated in small areas and poisoning neighboring communities of color. There is not a map of the entire city in the EIS. They all cut off just above Greenlake. This is a city-wide rezoning of industrial lands, yet it does not show the whole city. It is impossible to develop policies that address land use and zoning issues without once mentioning the other side of the story – the portion of the city devoted exclusively to single-family housing.

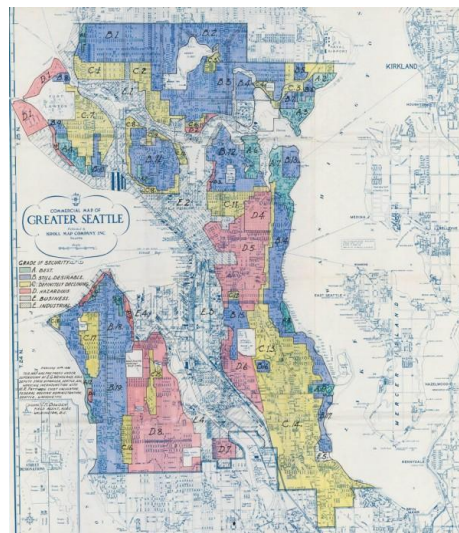
More broadly, the EIS mentions patterns of exclusion and redlining as if they happened in the past. Exclusion and redlining are current issues supported by current policy. In Exhibit 3.8-2, the EIS did an amazing thing by combining the Urban Villages map with the Industrial Centers map, two that are not normally put together. They show that density never touches water, only industrial waterfront. Beaches are reserved for Seattle's homeowners.

Ch.3 Environment, Impacts, & Mitigation Measures • Land & Shoreline Use

Exhibit 3.8-2 Future Land Use Map for Industrial Areas Within and Outside MICs



Source: City of Seattle, 2021.



Seattle Industrial & Maritime Strategy • December 2021 • Draft Environmental Impact Statement 3-255

Examining Exhibit 3.8-2 (left above) side-by-side with the 1930's Home Ownership Lending Corporation map (right above) that established mortgage patterns which "redlined" communities of color shows that nothing has changed in 100 years of Seattle's zoning. Industrial and downtown neighborhoods are left unshaded. "Undesirable" neighborhoods, still the city's most diverse, were in red. The boundaries of the industrial zones and urban villages are the same lines that separated White mortgagees from Black and industrial neighborhoods in the 1930s. (HOLC map from The Seattle Civil Rights and Labor History Project, University of Washington)

In the Seattle 2035 Comprehensive Plan from 2015, the Urban Village strategy is described as “places that **already have** active business districts and concentrations of housing” (Seattle 2035 10, emphasis added). This continued the Urban Village concept that was adopted in the 1994 comprehensive plan, where the first goal was to “Maintain and enhance Seattle’s character” which it started to define as “large single family areas of detached houses.” (Toward a Sustainable Seattle 5) That plan never once mentioned how many of those single family neighborhoods had restrictive covenants written into their deeds. The comprehensive plans did not break any barriers, they reinforced them and continue as the basis for zoning we have today. The EIS states “since MICs were established in 1994, there have not been large-scale alterations to their geographic boundaries.” (DEIS 1-6) That same recognition can go back to the HOLC maps decades earlier.

The EIS struggles to explain how new zones will overcome the disparate impacts to communities burdened by the impacts of industry. As extensively documented by the Duwamish River Community Coalition in their comments, many of the EIS mitigation measures come down to “new zones will prompt construction of new buildings that will be better.” No matter how good a new building is, it cannot surpass the boundaries it is dropped into. And those boundaries have remained unchanged for 100 years. The industrial boundaries are steeped in systemic racism and continued by this Industrial and Maritime Strategy. The city is once again specifying factories and manufacturers are only allowed in certain areas that are next to communities of color. The boundaries are the segregation. This EIS maintains each and every one of them.

And that’s the reason it’s vitally important that this story be told within this EIS. There are 100 years of policies squeezed between that first Seattle zoning code in 1923 and today. Each one builds upon the last. Unquestioningly carrying forward the framework of racial segregation and exclusion from one copy to another is just putting a new book cover on the same redlining manual. This EIS fails to recognize that chain, much less break it.

It is indeed the city's prerogative, as the Lead Agency, to define the range of alternatives it studies in the EIS. But that is exactly the same prerogative it has used to segregate and redline for the last century. While this EIS cannot single-handedly undo that damage, it can make some steps in the right direction:

1. Add documentation, analysis, and maps that connect Seattle's historic segregation, redlining, and exclusion to the present day location of industrial uses.
2. Complete a city-wide analysis of zoning that looks specifically at the ways commercial and multi-family exclusions in other parts of the city lead to the competition for industrial land. Use maps of the entire city.
3. Examine which recommendations and boundaries are carried over from older plans that have never been vetted for equity or impact, including transportation and public facilities.

IV. Conclusion and Summary of Comments

These comments are not offered to summarily reject or undermine the Industrial and Maritime Strategy or the draft EIS. As said, the proposal to update the city's industrial zoning is good. The proposed zones have a lot of potential to reflect the new realities of manufacturing. They offer a chance for employers to be participants in the neighborhoods rather than kept segregated and apart. We look forward to making further comments during the legislative process to draft and locate the zones in order to prevent petty, classist, or biased exceptions. But the proposal is strong and having it on the table is a massive step forward.

However, the EIS is missing any recognition that the lines themselves are part of the issue. These historical boundaries made their own problems, and we are left to unquestioningly continue being constrained within them. To address the impacts of the Seattle Industrial and Maritime Strategy, the Environmental Impact Statement must make

robust efforts to understand history and the sources of inequity in shaping land use decisions. Without those components, the mitigations proposed are simply inadequate, and the City will set itself up for unlimited challenges as it moves ahead with this rezoning and the coming 2024 Comprehensive Plan.

**Share The Cites Action Fund
March 2 DEIS comments**

Submit your own comments 3/2/2022 here:

<https://www.seattle.gov/opcd/ongoing-initiatives/industrial-and-maritime-strategy>

Send written comments on the Draft EIS by **March 2** to PCD_Industry_And_Maritime_Strategy@seattle.gov

Holmes, Jim

From: Nick Malshuk <nickm@cgcompost.com>
Sent: Tuesday, March 01, 2022 3:28 PM
To: Holmes, Jim; Wentlandt, Geoffrey; PCD_Industry_And_Maritime_Strategy
Cc: Holly D. Golden
Subject: DEIS Comment Letter
Attachments: First South Properties DEIS Letter.pdf

CAUTION: External Email

Good Afternoon,

Attached is our comment letter for the proposed zoning changes related to our property located at 7343 East Marginal Way South.

Thanks,



Nick Malshuk | Vice President of Real Estate
Cell: 206.498.8015 | nickm@cgcompost.com
Customer Service: 1.877.764.5748 | www.cedar-grove.com



*Did you know the average household participating in organics recycling generates approximately **five yards** of compost annually? Click below to learn more!*



Dear Mr. Wentlandt and Mr. Holmes,

This comment letter is submitted in response to the Seattle Industrial and Maritime Lands Strategy Draft Environmental Impact Statement (the “DEIS”). First South Properties LLC owns the property located at 7343 East Marginal Way S. Our company is the landholding entity affiliated with Cedar Grove Composting and Cedar Grove Organics Recycling. We are a longstanding partner with the City of Seattle as we continue to divert organic materials from the landfill and recycle those materials into compost products at our local compost facilities located in Maple Valley and Everett. This East Marginal Way S site serves as our corporate headquarters with product sales as well as vehicle yard and shop for our hauling operation. The site is zoned Industrial General 1, and it was permitted in June 2007 for office (approximately 29,000 sf) and vehicle maintenance (approximately 35,000 sf). These uses have continued on the site since that time.

33-1

Under all three action alternatives in the DEIS, this site would move to a Manufacturing, Maritime, and Logistics (“MML”) designation. We make the following comments for your consideration as the process moves from the DEIS to the Final EIS (“FEIS”).

1. Continue to Recognize Existing Uses. Under the current code framework, SMC 23.50.027.B affords some flexibility for uses existing as of September 26, 2007. Our office use exceeding 10,000 sf was established prior to this date. We would request that the FEIS and future regulations include a similar framework to avoid a burden on existing uses.
2. Allow Flexibility for Ancillary Uses. The DEIS notes a 30% limit on ancillary uses. We would urge that number to be 49% and recognize the wide range of uses necessary to support industrial uses. This is not a loophole that needs to be closed. This is an important part of allowing our business to function.
3. Broadly Define Industrial Uses. We understand the future regulations will further define and classify uses that are considered industrial uses. We request that the following uses continue to be allowed in the MML classification. Some of these uses exist on our site today, but others are uses that we could envision expanding to as our business continues. Please continue to allow the following industrial uses:
 - a. Solid waste handling and management, which includes the acceptance, sorting, processing and transfer of municipal solid waste, construction, demolition, land clearing, recyclables and organic waste streams from commercial and residential sources
 - b. Home product delivery services
 - c. Commercial product delivery services
 - d. Certified weigh scale operations

33-2



7343 E. Marginal Way S.
Seattle, WA 98108

- e. Compost and soil amendments product sales for retail and wholesale customers
- f. Warehouse services
- g. Truck and equipment maintenance shop services

33-2
cont.

As longtime industrial operators in the area, we urge you to study and adopt maximum flexibility in the regulatory framework. We do not perceive a proliferation of competing or conflicting nonindustrial uses in our area. To support Seattle's industrial users, the City's regulations should allow maximum flexibility and adaptability. Seattle is more expensive than surrounding jurisdictions. If industries are going to stay in Seattle, then their wide range of operations and needs must be recognized in the City's industrial lands regulatory framework.

33-33

We look forward to continued engagement through this process.

Sincerely,

Nicholas Malshuk
Vice President of Real Estate
First South Properties

Holmes, Jim

From: Jack McCullough <jack@mhseattle.com>
Sent: Wednesday, March 02, 2022 10:39 AM
To: PCD_Industry_And_Maritime_Strategy
Cc: Holmes, Jim
Subject: DEIS Comment letter
Attachments: Industrial Lands DEIS Comment Letter (3-2-22).pdf

CAUTION: External Email

Here is a comment letter on the Industrial Lands DEIS.

Jack

John C. McCullough
Attorney at Law
MCCULLOUGH HILL LEARY, PS
701 Fifth Avenue, Suite 6600
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McCULLOUGH HILL LEARY, PS

March 2, 2022

VIA ELECTRONIC MAIL

City of Seattle, OPCD
Attn: Jim Holmes
P.O. Box 94788
Seattle, WA 98124-94788
Jim.Holmes@Seattle.gov

Re: Comments on Draft EIS for Industrial and Maritime Strategy

Dear Mr. Holmes:

We are writing on behalf the Seattle Industrial Coalition (“Coalition”) to provide comments on the Draft Environmental Impact Statement (“DEIS”) for the Industrial Lands planning proposal (“Proposal”), notice of which was issued on December 16, 2021.

On July 8, 2021, the City issued a Determination of Significance (“DS”) for an “updated comprehensive strategy to strengthen and grow Seattle’s industrial and maritime sectors for the future” including a proposal under which the City would “update its industrial and maritime policies and industrial zoning.” This effort is known as the City’s Industrial and Maritime Strategy. The City is now proceeding with the EIS for the Industrial and Maritime Strategy.

34-1

A. Interests of Coalition

The Coalition is an unincorporated association with members who own, manage and develop industrially-zoned property in Seattle. Members of the Coalition are adversely affected by the Proposal because the current and future use of their property will be unreasonably restricted by the Proposal. They own property on which development projects are proposed that must be modified or are rendered infeasible as a direct result of the Proposal. In addition, they are users of these projects and individuals who live or work near them who will be impacted by loss of new storage, offices, sales and services, restaurants and associated amenities that would have been provided by these projects but for the Proposal.

34-2

B. The Proposal Description is Inadequate

Under the State Environmental Policy Act (“SEPA”), “[p]roposals should be described in ways that encourage considering and comparing alternatives. Agencies are encouraged to describe public or nonproject proposals in terms of objectives rather than preferred solutions.” WAC 197-11-060(3)(iii); *see also* Department of Ecology SEPA Handbook (“SEPA Handbook”), Section 4.1. Contrary to this requirement, here the Proposal is described as specific zoning text amendments. The Proposal is not described in terms of its objectives, in violation of WAC 197-11-060.

34-3

C. The DEIS is Based on Inadequate Information

A threshold determination must be “based upon information reasonably sufficient to evaluate the environmental impact of a proposal.” WAC 197-11-335. As discussed below, the DEIS is based on inadequate or inaccurate information. “Implicit in the statute is the requirement that the decision makers consider more than what might be the narrow, limited environmental impact of the immediate, pending action.” *Cheney v. Mountlake Terrace*, 87 Wn.2d 338, 344, 552 P.2d 184, 188 (1976). “The agency cannot close its eyes to the ultimate probable environmental consequences of its current action.” *Id.* The DEIS must evaluate these impacts.

D. Comments:

1. **The DEIS fails to disclose or evaluate the entire proposal.** Under WAC 197-11-060, “proposals or parts of proposals that are related to each other closely enough to be, in effect, a single course of action shall be evaluated in the same environmental document.” In 2021, the City previously proposed two initiatives – a set of Comprehensive Plan amendments and a set of Land Use Code amendments – that were admittedly related to the current proposal. But just as the City erred in failing to evaluate those prior proposals in the context of this larger EIS proposal, the City now errs again by failing to address these well-documented initiatives in the context of this DEIS. The DEIS should be withdrawn and revised to include a full discussion of these initiatives, which are clearly documented as being a part of the current proposal.
2. **The DEIS alternatives fail to meet the requirements of SEPA.** The alternatives to be included in an EIS must be “reasonable alternatives” that “include actions that could feasibly attain or approximate a proposal’s objectives, but at a lower environmental cost or decreased level of environmental degradation.” First, we believe the City has belatedly commissioned (but not disclosed) an Economic Feasibility Analysis; we further believe that, using accurate assumptions (see below), this Analysis demonstrates that the DEIS alternatives are not financially feasible. As a result, they cannot be “reasonable” since they could not “feasibly attain or approximate” any planning or development result. Second, the three action alternatives in the DEIS are not really alternatives; they are merely slightly nuanced versions of the same plan. All three action alternatives restrict 87% to 90% of the City’s industrial areas to the same set of regulations. In order to meet the test of adequacy, the DEIS must present alternatives that are truly distinct.

34-4

3. **The DEIS manipulates the description of the existing condition to mask existing non-industrial land uses in the City.** The DEIS description of the mix of land uses in the City's industrial areas is carefully designed to obscure the reality of existing land use patterns:

- For example, in SODO the DEIS identifies 3249 acres of industrial uses in the geographic area. But 50% of these uses (approximately 1600 acres) are either Port of Seattle or other marine facilities, railroad facilities or all of Boeing Field. These are all permanently dedicated land uses, regardless of the City's land use planning and are not subject to City planning or market forces. They are the proverbial "thumb on the scale" of this environmental review. To understand the nature of land use in SODO, it is necessary to exclude these committed properties and compare the remaining sites that are subject to planning and market forces to similarly-situated non-industrial properties in the area. Removing the above-noted 1600 acres from the comparative analysis instantly almost doubles the proportion of non-industrial uses in SODO (from 18% to 33%). Thus, the DEIS dramatically overstates the amount of land dedicated to industrial uses that is subject to planning or market forces.
- Further, it appears that many acres of land attributed to "industrial" uses in the DEIS are actually more properly characterized as heavy commercial or commercial uses. This too overstates the amount of true industrial use in SODO. Proper accounting of these uses would further reduce the proportion of "industrial" land in SODO.
- SODO is littered with former industrial buildings that are either vacant or are currently devoted to interim uses. It also appears that the DEIS overstates the amount of industrial use in SODO by counting some of these unutilized buildings within the industrial inventory.
- The use of acreage as the metric for evaluating proportion of land use is deceiving, since it is only a two-dimensional measure. For example, the area of SODO north of Spokane Street alone includes over 2 million s.f. of office space in multi-story buildings. Gross floor area is a better metric to utilize in evaluating the relative proportion of land uses.
- The nature of land uses north of Spokane Street is significantly different from the land uses south of Spokane Street. South of Spokane Street, the area reflects a greater predominance of industrial uses, while north of Spokane Street, the land uses vary widely among industrial, commercial, office, retail, automobile sales, home improvement and institutional. By merging these two disparate areas for purposes of analysis, the DEIS hides the reality of land use in SODO. Accounting for the adjustments noted above, it is probable that a majority of land uses in SODO north of Spokane Street are non-industrial uses.

The net effect of these compounding issues is to camouflage the reality of land uses in SODO, in an effort to portray industrial uses as predominant when that is untrue in large portions of SODO.

34-5
cont.

4. **Non-industrial Areas.** The DEIS fails to address many industrially-zoned areas in Seattle that include few industrial uses or where industrial uses will inevitably be displaced in the next decade. Here are some examples:

- Elliott Avenue Corridor: Although largely zoned industrial, this area includes millions of square feet of office uses and hundreds of residential units, together with wineries, distilleries and other retail and medical services uses. It is a high-capacity transit corridor. There is virtually no industrial use in this area.
- 15th Avenue/Interbay Corridor: Similarly, this area with significant industrial zoning is home to major retail developments, hundreds of units of housing, low-income housing, a homeless shelter and major recreational facilities. Again, there is little industrial use in this area, which is also located on a high-capacity transit corridor.
- Ballard: A large area of Ballard south of Market Street and east of 15th Avenue W. is zoned industrial but includes a wide variety of uses, a minority of which are industrial uses. This area is located on a high-capacity transit corridor.
- Fremont: Significant industrially-zoned areas of Fremont are devoted to office, retail and other uses.
- Eastlake: Remnant industrial zoning remains on Eastlake Avenue, even though there is no realistic prospect of industrial use in this area.
- Judkins Park: Significant industrially-zoned areas lie close to Judkins Park. These areas house a variety of uses, few of which are industrial. The prospect of future industrial use in this area is remote.
- SODO: The 1st Avenue S. corridor in SODO has few industrial uses and includes millions of square feet cumulatively of office, retail, home improvement, entertainment and other commercial uses. The 4th Avenue S. corridor in SODO similarly includes mostly retail, fast food, office and other commercial uses.
- Georgetown: Portions of the heart of Georgetown are zoned industrial but have not housed industrial uses in decades and are unlikely to in the future.
- North Lake Union. The zoning in this area is a mix of C-1, C-2, IB and IC and the predominant uses are commercial uses of various kinds.

34-6

Some of these areas lie outside of mapped MIC's and others are within. But none is characterized by industrial use or likely to convert to industrial use in the future. The DEIS must acknowledge the reality of these land uses in all of these subareas.

34-6
cont.

5. **Sound Transit Station Areas.** Many industrial areas lie within a walkshed of existing or future light rail walksheds and therefore represent candidate TOD areas. These areas include:

- SODO Station
- Stadium Station
- Smith Cove Station
- Dravus/Interbay Station
- Ballard Station
- Judkins Park Station

34-7

As a result, hundreds of acres of industrial land in all the DEIS alternatives will be – in merely 15 years – within a ½ mi. walkshed of regional light rail stations. Most of these areas are not currently characterized by industrial use and are not likely to be so in 15 years. The DEIS completely ignores the relationship of this future light rail service and the role that industrially-zoned – though not industrially-used – lands should play in the regional plan for transit-oriented development. The City has adopted plans and policies to promote land uses that support this high-capacity rail infrastructure, which the DEIS ignores.

6. **Financial Feasibility.** The DEIS alternatives have not been tested as to their respective financial feasibility. Although economics itself is not typically an EIS element, EIS alternatives must be reasonable and therefore must have some practical reality of being possible. If the alternatives cannot be financially implemented, then they cannot accomplish the objectives of the proposal. To our understanding, the City did not test the financial feasibility of any of the DEIS alternatives prior to DEIS publication. This work is a necessary precondition to the validation of each of the DEIS alternatives and must be completed prior to issuance of an adequate DEIS.

34-8

We understand that this work is already belatedly underway; but it needed to inform the DEIS, not lag behind it. And all such work must be subject to public scrutiny as a part of the SEPA process. Based on our study of local development economics, the following assumptions should be included in any such study of prototype developments under the proposed land use concepts:

- Cap Rates:

- As you know even slight differences in the cap rate selected has a significant effect on valuations that ripple through any land residual model. The cap rates used by the City must be consistent with current market experience. The use of inaccurate cap rates will produce a result that will render the analysis unsupportable. Given our market research, the following cap rates should be used in the City model to achieve an accurate result: 4.5% for Flex Industrial, 5% for Tech/Office, 4% for unrestricted Residential (not Caretaker Residential); Caretaker residential is hard to model because it doesn't work anywhere else, so there aren't any real historical Cap Rate assumptions to use, and finally 7-7.5% for hotel.
- Vacancy Rates:
 - Office/Tech is currently suffering short-term struggles in some sectors due to COVID, but this is a long-term study. Over the long term, a vacancy assumption of no more than 10% should be used, which itself is probably overstated given the relative saturation of the local market and the lack of available land inventory.
 - The Flex Industrial vacancy assumption should be 20% for multi-story industrial uses in the DEIS alternatives. It should use a very large vacancy assumption on any of the second or third floor square footage (any upper floors designated Flex Industrial), since there are not well-established market comps for 2nd and 3rd story occupancies for this product. A Vacancy and Credit Loss must be at least 10% or higher to be realistic. Since this should be a conservative analysis, we suggest the use of a Vacancy and Credit Loss figure of 20%.
 - The Caretaker Residential use in the DEIS alternatives is a fiction, unsupported by actual market experience. In lieu of a higher Cap Rate, the larger Caretaker Residential options should include a very high vacancy rate of at least 50%, because the demand for that type of housing is minimal at best.
- Development Hard Costs:
 - Given the reality of construction costs in the market, Light Industrial Flex Hard Cost must be in the range of \$300 psf.
 - Similarly, Tech Office or R&D Hard Costs should be at least \$425 psf.
 - Other Numbers to consider:
 - Industrial Manufacturing - \$130-175 psf
 - Housing - \$320-340 psf
 - Maker Space - \$210-260 psf

- Environmental Costs:
 - Most of the MIC lands have some degree of environmental clean-up required, and the related costs are indeterminate from both a pricing and a timing standpoint. The model should assume a significant base environmental clean-up cost.
- Land Value:
 - The real time land value data is pointing to \$180-\$200/sq. ft. and escalating.
- SODO Infrastructure:
 - The SODO neighborhood has major infrastructure/repair issues to contend with. Sidewalks, lighting, safety, etc. are all underfunded, but no project conforming with the proposed alternatives would throw off enough extra cash to help fund it. Funding those much-needed upgrades will need to be addressed.
 - The City of Seattle needs to improve the construction permitting process. It is widely known within the real estate community that getting projects permitted in Seattle adds significant costs due to excessive delays. If the City needs more revenue, streamlining/improving that process will certainly help.

34-8
cont.

7. **Blight.** Because, based on our analysis using the inputs noted above, the DEIS alternatives are not financially feasible, the adoption of any of the alternatives will simply result in little capital investment or new development in the industrial areas of Seattle, and probably less than what might occur in the no-action alternative. This will result in a continuation of Seattle's long-term policy of starving its industrial areas of capital investment. Unused industrial buildings will remain vacant and paved lots will be devoted to low-capital uses such as trailer storage, and van and truck storage. SODO, for example, is uniquely situated to be the principal launching pad for last-mile delivery vehicles, but this is not the robust industrial future that the DEIS imagines.

34-9

Instead, the implementation of any of the alternatives will simply lead to increased urban blight in the industrial areas of Seattle, other than those marine industrial areas in current use. This blight, already noteworthy in areas of SODO, Ballard, Interbay and Georgetown, will simply increase. The DEIS completely ignores this potential impact of the alternatives.

8. **The Proposal Will Result in Significant Adverse Impacts.** The Proposal will cause properties unsuited to the uses allowed by the Proposal to not be developed or redeveloped. This will reduce employment opportunities and the products and services available to communities in and near industrial areas. Existing buildings that are unsuited to the industrial uses allowed by the Proposal due to their size, location or layout, or other factors, will not be able to be reused and will sit vacant and fall into disrepair. Further, the Proposal will render many developments nonconforming, discouraging future capital investment in them. In short, the Proposal is a solution in search of a problem.

34-10

Due to these effects, the Proposal will result in significant adverse impacts to the built environment, including aesthetics and blight, environmental health, transportation and land use. Regarding aesthetics and blight, properties will sit vacant or, if they have existing buildings, these buildings will go unmaintained and deteriorate, causing significant adverse aesthetic and blight impacts. Regarding environmental health, environmental cleanup that would occur with development will not happen, causing significant adverse impacts to environmental health. Regarding transportation, uses prohibited by the Proposal, specifically workforce housing, will have to locate further from the people that use them, increasing the volume and length of vehicle trips, causing significant adverse transportation impacts. As a result, even if new jobs were generated under the alternatives – which is open to debate – workers would be forced to commute, often by car. Regarding land use, these impacts will result in inconsistencies with existing Comprehensive Plan goals and policies supporting economic development and environmental cleanup including but not limited to EDG3 (“Encourage a business climate that supports new investment, job creation and resilience and that values cultural diversity and inclusion.”); ED3.2 (“Strive to make the business climate more competitive through use of transparent and predictable regulations . . .”); EN 1.9 (“Work with other levels of government and with the private sector to support and encourage the cleanup of contaminated soil and other environmental remediation associated with the re-use or expansion of industrial sites.”); T4.3 (“Reduce drive-alone vehicle trips, vehicle dependence, and vehicle-miles traveled in order to help meet the City’s greenhouse gas reduction targets and reduce and mitigate air, water and noise pollution.”).

34-10
cont.

9. **Loss of Mitigation Opportunity.** As the DEIS notes, Seattle’s industrial areas are beset by a host of historic problems, including site contamination and inadequate infrastructure and streets. Since all of the DEIS alternatives are financially infeasible, the adoption of any alternative will simply compound and exacerbate these existing environmental problems. The DEIS must acknowledge this impact. In other words, unless the DEIS alternatives can be demonstrated to remedy these problems, it must be presumed that they will preserve or worsen these impacts. This result would be an adverse environmental impact under SEPA and must be disclosed in the DEIS.

34-11

10. **The DEIS ignores regional impacts.** SEPA requires a DEIS to consider the regional and multi-jurisdictional impacts of a major non-project proposal like this one. The use and development of industrial operations in the Puget Sound area does not limit itself based on municipal boundaries. But like most EIS’s prepared by the City of Seattle, this DEIS ignores such regional impacts. The DEIS should focus on impacts and issues beyond the City limits, such as:

34-12

- For the past 5 years or more, most significant industrial development in the region has been focused in the areas south of Seattle and proximate to the Port of Tacoma, which is investing (together with WSDOT) millions of dollars in mobility improvements. How does the use or development of industrial lands in Seattle relate to this trend?

- Conversely, the market has shown strong demand for fleet and vehicle parking in industrial areas closer to the Seattle/Bellevue core. By precluding capital investment in Seattle’s industrial areas (see attached summary), the Proposal may relegate many of these sites in the City to use as last-mile delivery hubs or van storage, all in servitude to the larger distribution facilities elsewhere in the region. Are these the kinds of “industrial” jobs and land uses that the City is truly trying to promote?
- As noted above, hundreds of acres of industrial lands in Seattle will play a key long-term role in the success of regional light rail. But if Seattle renders these TOD areas off-limits to housing, even in cases where true industrial uses are scarce, then it will tend to undermine the success of light rail and increase the regional cost of housing.

34-12
cont.

There are dozens more regional issues that should be addressed in the DEIS.

11. **The DEIS fails to disclose prior planning efforts.** The DEIS acknowledges a limited industrial lands planning effort conducted over the last two years, but fails to discuss a more elaborate, inclusive and productive planning effort that occurred in 2016-2017 under Mayor Murray. That effort led to a group of preliminary recommendations that are at odds with the DEIS alternatives and are completely ignored in the DEIS. Although the DEIS is intended to be a comprehensive disclosure document to aid the decisionmakers in this case, the DEIS instead intentionally ignores a prior substantial planning effort by the City that led to different conclusions. This indicates that the DEIS in this case is not designed to enlighten the decisionmakers, but rather to promote a predetermined result. Obviously, this is contrary to the requirements of SEPA. A summary of the preliminary conclusions of the prior planning exercise is attached to this letter. *See* Attachment A. In addition, we have attached a draft prototype analysis for a mixed-use, transit oriented development (TOD) aligned with the conclusions of this planning exercise that addresses all of the issues described above. *See* Attachment B.

34-13

E. Conclusion. For the reasons noted above, the DEIS does not satisfy the requirements of SEPA and does not provide a reasonable and defensible evaluation of the true environmental impacts of the Proposal. The DEIS does not include reasonable alternatives. The infirmities in the DEIS are too serious to be “remedied” by mere responsive comment in a Final EIS. In order for the DEIS to serve its intended purpose under SEPA – to properly inform the decisionmakers regarding the range of reasonable alternatives for this non-project action and the true impacts associated with each –the City must withdraw the DEIS and reissue a new DEIS that addresses and responds to the issues noted above.

34-14

Thank you for your consideration of these comments.

Sincerely,


John C. McCullough

March 2, 2022
Page 10 of 18

cc: Seattle Industrial Coalition

Attachment A

Review of 2015 Industrial Lands Task Force

Office of Planning & Community Development
City of Seattle
700 Fifth Avenue
Seattle, Washington 98104

Re: A New Zoning Proposal for SODO

To whom it concerns:

From 2015 to 2017, I was a member of the Industrial Lands Task Force (the “2015 Task Force”) established by Mayor Murray. Over the course of more than 18 months, this group examined the land use issues in SODO more candidly than any of its predecessors. After several months of sometimes stormy sessions, the 2015 Task Force focused on the possibility for an innovative land use plan for SODO. Since the current industrial lands review was intended at the outset to lead in a completely different direction, I wanted to take the opportunity to review the issues in SODO and the work of the 2015 Task Force, in the hope that this good work might inform the current efforts in the new administration.

1. Recent history of SODO zoning.

Much of the current zoning in SODO dates back to the Greater Duwamish MIC Plan from 2000 (the “2000 Plan”). The 2000 Plan reinforced the industrial use emphasis in SODO, maintained maximum size-of-use limits for various commercial uses and created the Stadium Transition District Overlay. Despite these protective measures, land prices in SODO continued to escalate in the following years and industrial users continued to depart the area. In 2007, Mayor Nickels proposed to the City Council a tighter set of protections for industrial uses in SODO, principally a series of significant reductions in the maximum size-of-use limits for commercial uses. These amendments were adopted in December 2007 (the “2007 Downzone”) and remain in effect today. For example, the 2007 Downzone reduced the per-lot office allowance in SODO to 25,000 s.f. or 10,000 s.f., depending upon the zone. Even stricter restrictions were adopted for retail, restaurant and entertainment uses. Once again, despite these protective measures, land values continued to rise and the departure of prior industrial users continued, although a new group of small-scale “maker space” users did enter the scene.

Following 2007, the City and the Planning Commission conducted various studies of SODO zoning, but no major changes were proposed as a result. In 2015, Mayor Murray convened the 2015 Task Force, which had drafted a series of recommendations by late 2017. Those recommendations were on the verge of being finalized when Mayor Murray left office. The Durkan administration decided to abandon this effort and move in a more conservative direction.

2. The Challenges in SODO

As an area, SODO is beset by a constellation of challenges, which together have prevented its development for any uses in the last several decades. These challenges are chronic and are only worsening over time.

- a. Escalating land value. For more than two decades, land values in SODO have escalated substantially, in spite of increasing protective and restrictive zoning regimes. These increases reflect the market's assessment that the industrial uses promoted by current zoning are not feasible in the medium- to long-term. Even the much tougher restrictions incorporated in the 2007 Downzone did not stem the tide of escalating land prices in SODO. Increasing land values increase the property tax burden on existing owners and place substantial upward pressure on industrial rents, which have combined to continue the exodus of historic industrial users from SODO. Smaller scale "maker space" users have entered the market in a nominal way, since their space requirements (and thus, rent burden) are significantly smaller. There is no indication that this long-term trend of escalating land values will abate, and in fact, for reasons discussed below, it may only increase further in the years ahead.
- b. Sites not conducive to large-scale industrial uses. Historic industrial uses in SODO were relatively land-consumptive, utilizing large building spaces and large exterior areas for truck yards, storage and staging. But in the last several decades, the trend toward larger industrial facilities has only intensified, and users of scale have departed SODO for the much larger sites available in South King County, Pierce County and points further south. Today, the lot and block pattern in SODO cannot support significant industrial users of this era; thus, the only real growth in industrial demand in SODO has been in small-scale spaces in recent years.
- c. Existing land uses in SODO are predominantly non-industrial. Most land uses in SODO today are not industrial uses. These include:
 - i. Public uses (Metro/Sound Transit/City)
 - ii. Office uses (Starbucks/School District)
 - iii. 1st Avenue corridor (home furnishings/apparel/clubs)

- iv. 4th Avenue corridor (fast food/retail)
- v. Heavy commercial uses (many existing uses in SODO are not truly “industrial” uses, but rather commercial and heavy commercial uses, which can locate in commercial zones in the City)

The growth of these non-industrial uses over the last few decades has continued to crowd out existing industrial uses, despite the intervention of strict new zoning controls. As noted, some new industrial uses in SODO are smaller-scale “maker” type uses

- d. Congestion. While north/south corridors in SODO provide good accessibility, the area suffers from the lack of good east/west connectivity. The dramatic increase in train traffic through SODO in the last decade has significantly impacted the operations of at-grade crossings. The new Lander Street bridge will help address this issue, but continued deterioration at other at-grade crossings will simply put more pressure on this connection. In addition, the lack of adequate street infrastructure in SODO results in continuing conflicts between bicyclists and freight and vehicular movement through the area.
- e. Environmental conditions. The presence of soil and groundwater contamination throughout areas of SODO is well-documented, and can impose extraordinary costs on new development. The smaller-scale industrial users that more commonly frequent SODO today cannot economically support solutions to any of these issues. In addition, stormwater collection and treatment are issues of increasing focus in SODO. Again, potential industrial use in the area cannot attract the level of capital necessary to address any of these issues.
- f. Soil conditions: Recently, the Seattle Department of Construction and Inspections (SDCI) has embraced stricter standards for ground improvement and foundation systems in the liquefiable soils of SODO. The significant costs of these below-grade improvements cannot be underwritten by industrial development; thus, these new standards will effectively preclude new ground-up industrial development. In order to attract the level of capital necessary to undertake such improvements, greater density of higher-value uses like office and research and development would be required.
- g. Unreinforced masonry buildings. SODO is home to a significant proportion of the unreinforced masonry buildings in the City of Seattle. But given the relative unavailability of capital for development, the likelihood of remedial work being feasible in the current environment is small.

- h. Failure to capitalize on light rail. SODO has as many light rail stations today as South Lake Union will have in 2035. But current zoning restrictions prevent the area from capitalizing on this enormous regional investment in high-capacity rail transit.
- i. Inability to attract capital investment. Long-standing protective zoning precludes uses and development that can support new capital investment in SODO. As a result, the market will not make funding available to address any of the challenges in SODO and the area will continue its decades-long pattern of being starved of private capital.

3. The Challenges and Opportunity for the Region

In addition to the challenges that are unique to SODO, the larger region faces critical issues regarding employment growth and optimal light rail usage. SODO's location adjacent to the Center City also provides it an opportunity to play a role in resolving these issues.

- a. Lack of new office sites in Center City Seattle. Seattle's Comprehensive Plan targets tens of thousands of new jobs in the Center City over the next twenty years, and Sound Transit is doubling down on the Center City as the hub of its expanding regional light rail network, with plans to add a new Downtown tunnel and several new stations over the next 15 years – at a cost of billions of dollars. Unfortunately, the inventory of available sites in the Center City large enough to host a new office development is dwindling to almost none. Due to floorplate requirements, an office development site requires at least 25,000 s.f. of area, and today almost all of the redevelopable sites of this size are spoken for. By 2026, when this current pipeline of projects completes delivery, there will be virtually no inventory of suitable office sites in the Center City.

Bellevue has been more than happy to make up for this future shortfall, but our regional rail strategy and the City's own Comprehensive Plan are predicated on continued employment growth Downtown. SODO is the only direction this growth can occur, and the area is already served by light rail – service that will only improve by 2035.

- b. Challenges for regional light rail. As noted, Sound Transit building a \$50+ billion regional light rail system based around an employment hub in Center City Seattle that will soon be maxed out.
- c. These challenges also create a unique opportunity in SODO. While SODO has its own challenges, it is also uniquely located to play a role in resolving some of the regional problems noted above.

4. The Future of SODO

The 2007 Downzone and other protective zoning measures adopted in the past have done nothing to restore significant industrial use in SODO. In truth, these actions have just created a “holding zone” in SODO to prevent capital investment. With commercial FARs remaining so low, there will be little reinvestment in the area and SODO will continue to sit underutilized, its challenges unaddressed.

Importantly, these circumstances will attract to SODO uses that do not depend upon capital investment, such as last-mile delivery services. Given its proximity to Downtown and other urban centers, SODO is well-positioned to grow in the future as a headquarters for vehicle delivery services. Ironically, the protective zoning measures designed to save industrial uses now only makes SODO attractive for existing non-industrial uses and jobs for delivery drivers.

This likely future for SODO will see little new capital investment, a continuation of the long-standing challenges besetting the area, a persistent increase in land values and ongoing underutilization of light-rail infrastructure.

5. A New Zoning Proposal for SODO

The 2015 Task Force was unique in that it confronted many of these issues and considered an alternate course for the future of SODO. This approach was not oppositional and restrictive, but instead considered a structure in which uses became interdependent, capital investment could be attracted and steps could be taken to address SODO’s chronic challenges. What follows is my version of this concept.

- a. Develop a new zoning overlay for SODO. Keep the present industrial zoning, but impose an overlay on all of SODO from the sports stadiums to Spokane Street. Under the overlay, projects that qualified under certain criteria could achieve greater office density.
- b. Use & Density: Allow up to 6 FAR of commercial office use on a site, as long as the site includes 1 FAR of industrial uses. Industrial uses would include maker space, breweries, R&D, high-tech assembly, small-scale manufacture and the like. Maintain limits on retail use to prevent destination or large-scale retail. This structure will ensure the capital investment necessary for new development in SODO and will require new office development to protect and support on-site industrial uses over the long-term.
- c. FAR Bonus: Charge bonus fees for office FAR, dedicated as follows:

- i. Affordable Housing: 25% to support production of affordable housing in appropriate locations in the City
- ii. Freight & Bicycle Mobility: 25% to support capital improvements to enhance freight mobility and bicycle connections through SODO
- iii. URM Buildings: 25% to create a fund for loans and grants to support retrofit of unreinforced masonry buildings in SODO
- iv. Environmental: 25% to create a fund for loans and grants for site remediation and stormwater treatment

Preliminary estimates prepared by City staff for the 2015 Task Force indicated that such a bonus program could raise hundreds of millions of dollars in the decades ahead.

- d. Transportation Management: In the past decade, the marginal SOV rate for the 60,000+ new jobs added Downtown has been a mere 10%. New office development in SODO would be subject to strict TMP controls to ensure similar performance. Local shuttle service and enhanced Metro service could connect employees to light rail stations and the Center City.
- e. Maritime Uses: The Port of Seattle is pursuing its own long-term plans for its maritime properties. This overlay would not apply to Port properties.
- f. Residential Uses: Portions of SODO could be appropriate for workforce housing and other residential uses, and there are examples around the world of peaceful coexistence between industrial and residential uses. But the 2015 Task Force did not address this issue. This issue may be more appropriate for consideration in a larger strategy relating to affordable and workforce housing.

6. Conclusion.

The recent history of zoning in SODO has been predicated on maintaining opposition between commercial and industrial uses. But while policy decisions have consistently favored industrial uses, the last several decades of protective zoning have done nothing to preserve industrial uses. Instead, these measures have only succeeded in starving SODO of new capital investment. The key to a real future in SODO is to attract capital investment that will support long-term industrial uses, while at the same time help to address the challenges of the area. The need for more employment space in the larger Center City and the continuing investment by Sound Transit in light rail together create a singular opportunity: to marry office use and industrial use in a way that can promote both uses, as well as to create a path to address the infrastructure deficiencies in SODO that have been ignored for so long. Simply put, capital starvation in SODO is a failed strategy. It is time to put capital to work.

March 2, 2022
Page 17 of 18

I appreciate the opportunity to provide these comments.

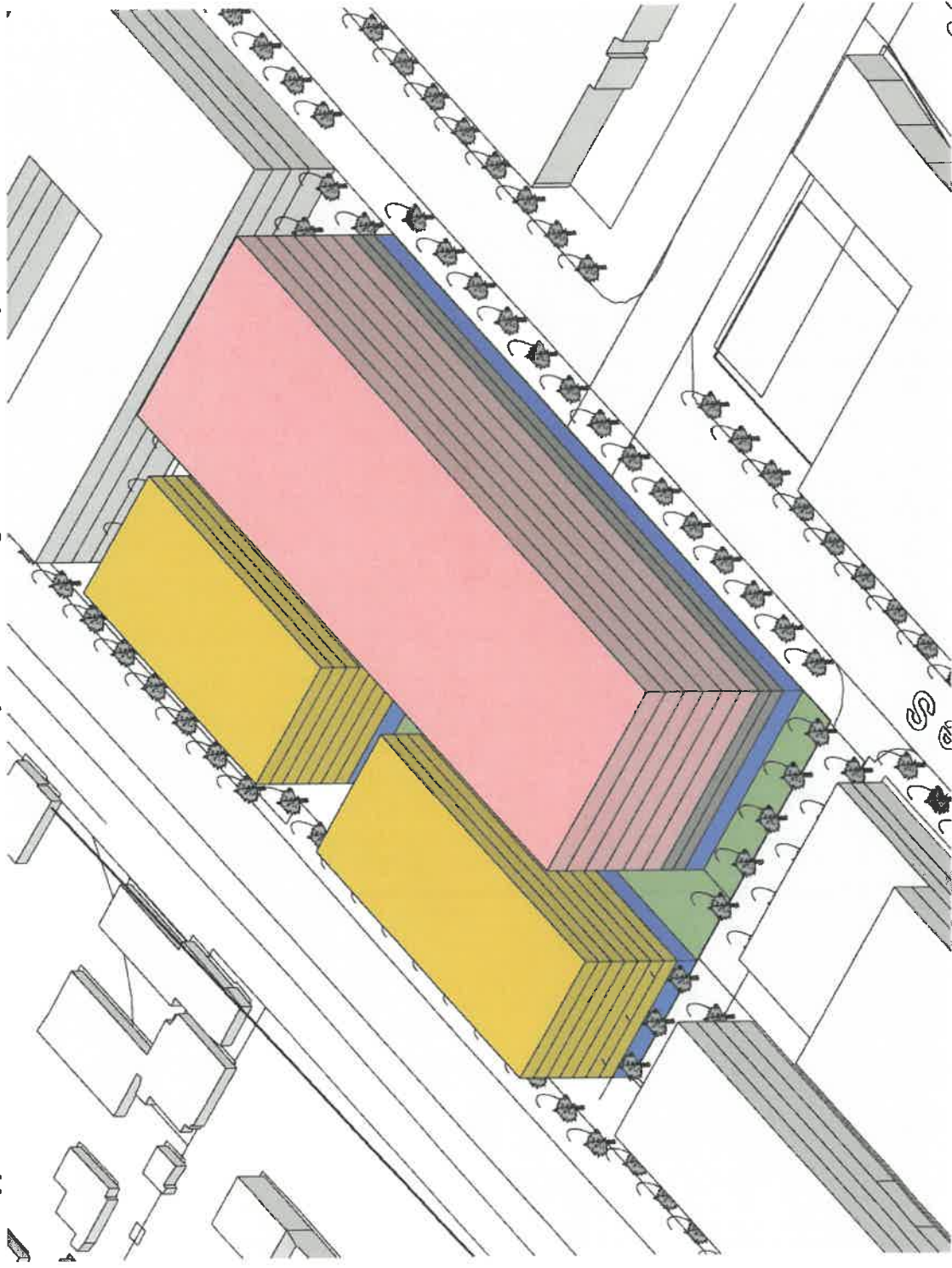
Sincerely,

John C. McCullough

Attachment B

Draft Prototype Analysis
Mixed-Use TOD Development

Prototype 1S: Industrial and Innovation plus Housing - 2.4 Ac Lot Adjacent to Public Transit



Prototype 1S: Industrial and Innovation plus Housing - 2.4 Ac Lot Adjacent to Public Transit

Site Size 106,769.6 SF
2.45 Acres

Three Buildings

- One Light Industrial & Commercial Office with Parking
- Two Light Industrial & Multi-Family Workforce Residential

Proposed Total Gross Floor Area (SF above grade) 574,000 SF

Parking Type Above ground integrated into Light Industrial Building

Building Footprints

- Light Industrial & Commercial Office 50,000 SF
- Light Industrial & Multi-Family Workforce Residential 28,000 SF

Number of Stories

- Light Industrial & Commercial Office 9
- Light Industrial & Multi-Family Workforce Residential 8

FAR

- Light Industrial 0.73
- Commercial Office 2.81
- Multi-Family Workforce Residential 1.84
- Total 5.38

MHA N/A

Building Program	Light Industrial/Flex	Tech Office or R&D	Residential - Workforce	Parking	Other
Land					
Built Square Feet	78,000	300,000	196,000	100,000	
Parking					
Light Industrial				70	
Commercial Office				250	
Multi-Family				0	
Net Rentable Revenues	70,200	255,000	166,600		
Gross Rental Revenue	\$ 1,769,040	\$ 9,180,000	6,997,200	576,000	
Minus Vacancy and Credit Loss	\$ 176,904	\$ 734,400	349,860	57,600	
Effective Gross income	\$ 1,592,136	\$ 8,445,600	6,647,340	518,400	
Minus Operating Expenses	\$ 79,607	\$ 675,648	1,994,202	259,200	
Net Operating Income (NOI)	\$ 1,512,529	\$ 7,769,952	4,653,138	259,200	
Capitalized Value:					
Medium	\$ 33,611,760	\$ 155,399,040	116,328,450	5,184,000	
Development Costs:					
Hard Costs	\$ 19,500,000	96,000,000	60,760,000	14,400,000	
Landscaping and Other Site Costs	-				\$ 1,067,696
Soft Costs	\$ 5,850,000	\$ 28,800,000	18,228,000	4,320,000	
MHA (if applicable)	-				
Entrepreneurial Return @10%	\$ 2,535,000	\$ 12,480,000	7,898,800	1,872,000	
Total Development Cost (Before Land)	\$ 27,885,000	\$ 137,280,000	86,886,800	20,592,000	\$ 1,067,696

Feasibility Summary

	Light Industrial/Flex	Tech Office or R&D	Residential - Workforce	Total Project
Total Project Value	\$ 310,523,250	\$ 37,661,760	\$ 155,399,040	\$ 117,462,450
Development Costs				
Building	\$ 252,051,800	\$ 27,885,000	\$ 137,280,000	\$ 86,886,800
Site	\$ 1,067,696	\$ 145,088	\$ 558,029	\$ 364,579
Parking	\$ 20,592,000	\$ 4,504,500	\$ -	\$ 16,087,500
Total Development Costs	\$ 273,711,496	\$ 32,534,588	\$ 137,838,029	\$ 103,338,879
Residual Land Value	\$ 36,811,754	\$ 5,127,172	\$ 17,561,011	\$ 14,123,571
Land Acquisition Costs	\$ 21,353,920			
Economic Surplus	\$ 15,457,834			\$ 36,811,754

Holmes, Jim

Letter #35

From: Patty Nelson <nelson@hmillc.com>
Sent: Thursday, March 03, 2022 3:31 PM
To: PCD_Industry_And_Maritime_Strategy; Holmes, Jim; Wentlandt, Geoffrey
Cc: Lowe, Marco
Subject: City of Seattle Industry and Maritime Draft EIS (Draft EIS)

CAUTION: External Email

Dear Jim and Geoffrey:

I am commenting on the City's Industry and Maritime Draft EIS (Draft EIS) on behalf of Elliott Way Partners LLC, which owns the vacant industrial property at 1405 Elliott Way West in Interbay (Property). Specifically, our comments on the Draft EIS are:

1. Incorporate and support the Seattle Industrial Coalition's comments, especially on the 15th Avenue/Interbay corridor.
2. Incorporate and support NAIOP Commercial Real Estate Development Association's comments, especially on Interbay.
3. Encourage the City to study an Industry and Innovation land use alternative that allows 4-6 sf. of allowable non-industrial density for each sf. of industrial use in new projects within ½ mile of the Sound Transit station locations in Interbay.
4. Encourage the City to study an Urban Industrial land use alternative that allows for artist/studio/maker residential uses at densities of up to 75-100 units per acre in new projects within ½ mile of the Sound Transit station locations in Interbay.
5. Oppose requirement for design review to be required for any projects within industrial zoning designations.

35-1

Thank you for the opportunity to comment.

*Patty Nelson, COO
on behalf of Elliott Way Partners, LLC*

~~~~~



**WE HAVE MOVED!**

5124 180<sup>TH</sup> ST E | Tacoma, WA 98446  
P: 253.874.3939 | F: 253.874.3965 | C: 253.686.4352  
[www.hmillc.com](http://www.hmillc.com)

**Please note my new email address: [nelson@hmillc.com](mailto:nelson@hmillc.com)**

**Holmes, Jim**

**From:** Peter A Nitze <Peter.Nitze@NSCO.Com>  
**Sent:** Wednesday, February 23, 2022 3:24 PM  
**To:** Wentlandt, Geoffrey; Holmes, Jim  
**Cc:** Ted Lehmann; McCullough, Jack  
**Subject:** Re: MIC Industrial Land Comments  
**Attachments:** image.tiff

**CAUTION: External Email**

Geoff and Jim,

I hope that you will respond to the email below. I believe that it is in all of our best interests to include the most complete and accurate information in assessing the land use concepts in the DEIS; and an analysis of the economic incentives to future development under these concepts is a critical element. As we discussed with you, we are entirely comfortable with the methodology applied by CAI once the revised, market-based assumptions are incorporated. This should entail no more than the replacement of a few numbers in the underlying spreadsheet, which would yield a good representation of the development economics for the various prototypes. 36-1

We would appreciate a prompt response given the closing window for submission of comments, ideally with the revised analysis, but at the very least with an explanation as to why the data is not available and what data that you have shared we may include in our comments.

Best,  
Peter

Peter A. Nitze  
President and CEO  
Direct 206.539.4886 | Mobile 973.349.4886  
Email [peter.nitze@nsc.com](mailto:peter.nitze@nsc.com)  
159 South Jackson Street, Suite 300  
Seattle, WA 98104  
[www.nitze-stagen.com](http://www.nitze-stagen.com)



On Feb 23, 2022, at 10:45 AM, Ted Lehmann <[ted@cmsenergyadvisors.com](mailto:ted@cmsenergyadvisors.com)> wrote:

Geoff and Jim,

The comment period deadline for the Industrial Lands DEIS is fast approaching and we would like our comments to include the economic work produced by CAI and your Team, with the input from our group. Is there an updated 'public' version that you can send over, and was CAI able to incorporate any of the changes we suggested in our email of January 28? This data is critically important in informing our response to the DEIS. 36-2



Further, we are not alone in believing that a robust economic analysis of the proposed land use concepts is vital to assessing their feasibility as can be seen in this excerpt from the draft letter produced by the Seattle Planning Commission, which states:

“The EIS should clearly document economic impacts such as demand for industrial property, square footage rents, and projected vacancy rates.

**The Planning Commission suggests seeking input from industrial stakeholders for this analysis, rather than rely on data generated by City staff or its consultants (emphasis added)...**

While we understand that economic analysis may be beyond the scope of the EIS, we strongly encourage this analysis to fully understand the implications of these land use concepts, to compare the Action Alternatives, and to inform the final policy decisions.”

We believe that our collaboration to date has addressed some of the above requests, but still has a long way to go to be fully fleshed out. We would strongly support a more detailed economic analysis, including examination of additional prototypes, either in the next phase or through an extension to the DEIS process to continue helping you and the City of Seattle develop more detailed answers to these questions.

Finally, we’ve made some minor changes to our earlier comments based on additional feedback from additional developers. Please see attached.

Thanks,

Ted Lehmann  
Peter Nitze  
Jack McCullough

<CAI Model comments v1.docx>

36-2  
cont.

**Holmes, Jim**

---

**From:** Peggy J. Printz <peggyjprintz@gmail.com>  
**Sent:** Wednesday, March 02, 2022 4:04 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** DEIS Comments  
**Attachments:** SCC Maritime Industrial Strategy Comment 03\_22.pdf

**CAUTION: External Email**



Thank you for this opportunity to comment on Seattle's Draft EIS for the Industrial and Maritime Planning Strategy.

We would like to add our support to comments submitted by the Duwamish River Community Coalition, Share the Cities Action Fund, and the Georgetown/South Park Advisory Group. We would also like to emphasize the importance of additional study/scrutiny regarding the impacts of systemic racist policies such as preferential zoning and redlining that still affect Seattle neighborhoods and public health. We ask that the City establish goals of near full employment and affordable housing to improve quality of life, protect the climate and reduce traffic congestion.

Of the available alternatives, we support Alternative 4, which includes additional protections and flexibility for more housing on industrial lands.

#### REVISIONS/COMMENTS BY SECTION:

- 
- 
- **Throughout the document,**
- the EIS must address the growing threats of climate change at the scale of the impacts and timeline identified by the best available science. This draft strategy fails to do so meaningfully. Nor does it integrate climate resiliency holistically throughout.
- Therefore we advocate for:
- - 
  - 
  - Housing near employment
  - 
  - 
  - 
  - 
  - Housing along public transit and light rail routes
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  - 
  - 
  - 
  - Prioritizing industries with reduced health impacts to community and workers
  - 
  - 
  - 
  - Prioritizing industries that create less greenhouse gasses, water contamination, soil contamination
  - 
  - 
  - 
  - Preservation of green spaces, especially near communities with high levels of pollution or historic or current connections to redlining practices
  - 
  - 
  - 
  - 
  - Innovative solutions to stormwater accumulation or contamination such as rooftop greenspaces, native plant gardens

37-1

- in medians and along sidewalks, preservation of wetlands, incentives to replace grass lawns with deeper rooted native plants
- 
- 
- 
- Making it harder for fossil-fuel intensive industries to expand
- 

37-1  
cont.

- 
- 
- **The 3.3 Water Quality section**
- does not mention cruise ships at all. This is a serious omission.
- Large cruise ships, such as those that currently operate out of Pier 91 and Pier 66:
  - 
  - 
  - Exacerbate the climate crisis using 30 - 50 gallons of fossil fuels for each mile traveled.
  - 
  - 
  - 
  - Negatively impact public health via smokestack emissions that can cause asthma, cancer, heart and lung diseases,
  - and early death. The impacts can affect workers, passengers, our Seattle-area communities, coastal communities along the ships' course, and the communities the cruise ships visit in Alaska. In addition, cruise ships can become spreaders of diseases and can
  - intensify viral outbreaks and pandemics.
  - 
  - 
  - 
  - Harm water quality by often dumping sewage, trash, and toxic engine waste directly into waterways.
  - 
  - 
  - 
  - Negatively impact marine life. In addition to the water quality impacts from dumping, noise pollution interferes
  - with the ability to use sonar for locating food, socialization, mating and can reach levels that cause mammals physical pain. Ships can strike and kill whales. The impacts of using fossil fuels that warm our planet lead to water temperatures too high for local
  - fish populations, and ocean acidification that severely impacts the formation of shellfish. Many of our local species, including Southern Resident Killer Whales, are already struggling to survive and are keystone species.
  - 
  - 
  - 
  - 
  - Register their ships in countries with "flags of convenience" that allow the cruise companies to avoid paying

37-2

- federal taxes, adhering to US environmental regulations, and following US labor protection laws. Many on-board workers make extremely low wages while working long shifts seven days a week for many months at a time.
- 

The cruise industry claims these ships bring huge economic prosperity to communities, yet its leaders do not reveal how they arrive at their calculations, or how much wealth actually benefits locally-owned small businesses and family-wage workers; and estimates of cruise's dividends do not take into account the negative financial impacts communities incur from climate, health, water and marine life impacts.

37-2  
cont.

Most (air/water) impacts listed are narrowly constrained to the study areas. While the document mentions that there are significant impacts to Puget Sound, the text only refers to the Sound in two places with no listing of mitigation measures for that body of water. None of the maps show the location of pollution sources in relation to the entire Sound.

As we saw this summer with container ships parking around the Sound while waiting out delays at the Port, (<https://www.king5.com/article/news/local/container-ships-anchored-in-puget-sound-causing-headaches-for-neighbors/281-0d5fb821-7e5e-49c2-813b-ec6c487de2b7>) Seattle's industrial and maritime operations have impacts throughout the region. These are not reflected in the EIS.

- 
- 
- **In DEIS section 3.2 Air Quality and Greenhouse Gasses,**
- it is stated in several places that shore power and other infrastructure upgrades will allow for decreased air pollution and GHG emissions even if cargo and cruise ship activities increase. For example, under Maritime Activities on 3-66, the DEIS states “with
- existing and planned regulatory requirements and local infrastructure improvements, these maritime emissions are expected to decrease under all alternatives, even if cargo volumes and cruise ship visits increase.”
- 

37-3

While the emissions reductions from infrastructure like shore power are quantifiable, the vague mention of “planned regulatory requirements” as part of the formula to achieve emission reduction outcomes - particularly given the well-documented history of the IMO's failure to regulate greenhouse gas emissions or provide significant enforcement for existing emissions regulations - comes across as misplaced faith that undermines our ability to plan realistically for the future.

Statements about maritime emissions lack context. Proposed mitigations listed in the EIS do not include how much improvement (if any) they actually provide. For example, the Port of Seattle reports that in 2019, cruise ship use of shore power at Terminal 91, where ships plug into Seattle's electricity grid while at berth instead of burning fuel, averted 2900 tons of CO2 emissions. [This represents less than 1/2 of 1% of emissions from the cruise sector.](#)

Providing additional context is important to avoid giving the impression that changes to local infrastructure, such as shore power, and rule making that may never materialize will be able to

significantly reduce greenhouse gas emissions such that cargo and cruise activity can be increased without contributing to the climate crisis on a global level.

Figures that would provide context to the relationship between the proposed mitigations and the overall air quality of the region include:

- 
- 
- What is the size of the Puget Sound airshed (where emissions are being counted)? and What is the size of the Puget Sound airshed relative to the average total distances traveled by cargo and cruise ships?
- 
- 
- Is there accounting for maritime emissions outside of the Puget Sound airshed? What are the limitations of the standard methods of accounting for maritime emissions?
- 
- 
- How does the reduction in maritime particulate and greenhouse gas emissions from the use of shore power quantitatively compare to the total emissions from maritime activity?
- - 
  - 
  - Perhaps the better question is: given that the majority of maritime emissions are not accounted for by any inventories, how can we best communicate the scope of local planning to local and global maritime air and greenhouse gas impacts?
  -

37-3  
cont.

- 
- 
- **In DEIS Section 3.8 Land & Shoreline** under SODO/Stadium, a proposed cruise terminal is mentioned. Even though the Port has recently canceled plans for this third cruise terminal at T46, ships docking at existing terminals continue to pollute both air and water, not to mention causing traffic congestion and significant emissions from passengers' flights.
- 

37-4

## CONCLUSION

As the city creates new zoning strategies and regulations, Seattle's Industrial and Maritime Strategy provides an opportunity to prioritize industries that enhance communities instead of poisoning their

37-5

air, water and wildlife. We can prioritize industries that provide safe conditions and living wage jobs to all their workers. We can prioritize and incentivize industries that are less fossil-fuel intensive.

In order to achieve better outcomes, we must improve the ways we approach our problems. Previous practices regarding regulations, zoning, permitting, and measurements of prosperity are part of what have put us where we are now—a city with some of the wealthiest people and companies on the planet but also a city where tents line the sidewalks, workers cannot afford to live, air quality is among the worst in the nation, and the sustainability of businesses are prioritized over the sustainability of our world and our children’s ability to survive.

37-5  
cont.

Our problems are woven together, so we must look at solutions that weave together the intersections of pollution, racism, profit over people, and short term gains versus planning for future generations. Please prioritize affordable housing, public health, climate protection and resiliency, industries with living wage employment opportunities and equitable hiring practices, and public transportation options. Thank you.

Peggy J. Printz  
On behalf of Seattle Cruise Control  
[SeattleCruiseControl.org](http://SeattleCruiseControl.org)



**Holmes, Jim**

---

**From:** Rivera, Fred /SEA <frivera@mariners.com>  
**Sent:** Wednesday, March 02, 2022 9:36 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy; Wentlandt, Geoffrey; Holmes, Jim  
**Subject:** Comment Letter Re Industrial and Maritime Strategy DEIS  
**Attachments:** DEIS Comment Letter - 3-1-2022.pdf

**CAUTION: External Email**

Please see attached DEIS Comment Letter from the Seattle Mariners. Thank you.

Fred



**FRED RIVERA**  
Executive Vice President & General Counsel  
Seattle Mariners  
p (206) 346-4154 | c (206) 883-7311  
T-Mobile Park - 1250 1st Ave S Seattle, WA 98134





Fred Rivera  
Executive Vice President & General Counsel  
1250 1<sup>st</sup> Avenue South  
Seattle, Washington 98194  
(206) 346-4154

Via Email

Office of Planning & Community Development  
[PCD\\_Industry\\_And\\_Maritime\\_Strategy@seattle.gov](mailto:PCD_Industry_And_Maritime_Strategy@seattle.gov)

Geoff Wentlandt, Planning Manager  
[Geoffrey.Wentlandt@seattle.gov](mailto:Geoffrey.Wentlandt@seattle.gov)

Jim Holmes, Strategic Advisor  
[Jim.Holmes@seattle.gov](mailto:Jim.Holmes@seattle.gov)

Re: Seattle Industrial & Maritime Strategy Draft Environmental Impact Statement

Dear Mr. Wentlandt and Mr. Holmes:

This comment letter is submitted by the Seattle Mariners in response to the Seattle Industrial and Maritime Lands Strategy Draft Environmental Impact Statement (the “**DEIS**”). The Mariners participated in the City of Seattle Industrial and Maritime Strategy Citywide Taskforce, and appreciate the progress the City is making to think about the future of industrial areas, including the Stadium District.

The Seattle Mariners lease T-Mobile Park from the Washington State Major League Baseball Public Stadium District (the “**PFD**”). As part of its lease agreement with the PFD, the Mariners are fully responsible for operating T-Mobile Park and the adjacent parking structure; the PFD has no operating responsibilities in or around the ballpark, including because of statutory restrictions on its authority. The Mariners have a significant interest in supporting a strong, growing, and equitable Stadium District within the industrial area.

As the City selects its preferred alternative and continues environmental review, we encourage the City to recognize the unique character of the Stadium Transition Area Overlay District (the “**Stadium District**”). The Stadium District fosters job creation and economic vibrancy in an industrial transition area, including at T-Mobile Park, Lumen Field and the Lumen Events Center. Maintaining a distinct Stadium District with its own regulations under the Land Use Code works well as a meaningful transition area between the mixed uses (including housing) in Pioneer Square to the north, and the light and heavy industrial areas south of T-Mobile Park.

The Final EIS (“FEIS”) analysis must recognize the two world-class stadiums and event center that draw more than six million visitors each year and make the Stadium District different than other industrial transitional areas. While these visitors may be making their trip to the Stadium District (often by public transit) for specific sporting, entertainment or community events, the FEIS should study a preferred alternative that encourages these visitors to linger before and after these events to further activate the economic and social potential of the Stadium District and minimize the transportation impacts of events. Of the four Alternatives provided in the DEIS, Alternative 4 (with minor modifications) best meets these goals, and we would encourage the City to consider the following comments as the planning work moves from the DEIS to the FEIS.

38-1  
cont.

### **1. Support lodging uses in the Stadium District**

We strongly support the proposed lodging use allowance in the Stadium District and within the Urban Industrial (UI) zone currently analyzed in the DEIS. We request that the identified preferred alternative in the FEIS allow lodging without a size limit in the Stadium District. Lodging will help bring a 24/7 vitality to the neighborhood, while additionally supporting the existing sport, entertainment, and community uses at the stadiums and event center. Lodging can also help foster diverse and equitable job growth within and beyond the Stadium District, while supporting the surrounding industrial areas that could have demand for business travel, without putting lodging directly in areas appropriate for intense industrial uses. Finally, we encourage the FEIS to acknowledge the positive impact lodging in the Stadium District will have on transportation patterns in the Stadium District by keeping event attendees in the neighborhood and off the roads before and after events.

38-2

Alternatives 3 and 4 provide no design review is required for lodging uses within the Stadium District. The Mariners strongly support this approach, as this will help expedite the many benefits associated with allowing lodging uses within the Stadium District.

### **2. Do not place size limits on activating uses within the Stadium District**

We do not support a strict size limit on activating uses within the Stadium District. While size limits for non-industrial spaces in other areas of the City could help support smaller businesses and startups, a strict size restriction in the Stadium District ignores the scale of use and development already occurring around the stadiums. We want to encourage a mix of uses within the Stadium District, including smaller-scale spaces such as maker spaces and innovative artistic spaces, however, we do not support a strict size limit on uses. Rather, we believe the City has an opportunity to use incentives to encourage smaller-scale spaces.

38-3

Alternative 4 provides size of use limits within the Stadium District for sites that do not include at least 0.4 FAR of industrial space, including a 75,000 square feet limit for lodging and a 20,000 square feet limit for general retail sales. We do not support these size of use limits and recommend these limits be removed. Alternative 4 does remove a size of use limit for restaurant and bars within the Stadium District, which we strongly support and believe other uses would benefit from. The FEIS should analyze and acknowledge the positive impact activating uses in

the Stadium District will have on transportation patterns in the Stadium District by keeping event attendees in the neighborhood and off the roads before and after events.

While a wide variety of uses within the Stadium District help activate the area and support the unique qualities cultivated by the stadiums, some uses, such as office, do not. While size of use limits are not appropriate for activating uses such as lodging, general retail sales, restaurants, and bars, among others, we support the proposed size of use limit for office uses proposed in the DEIS.

38-3  
cont.

### **3. Support additional density for compatible uses in the Stadium District.**

The Stadium District provides a unique atmosphere in the City, drawing in visitors from throughout the region and world. Because of this, the various uses within the Stadium District must too be thought of uniquely and provided the ability to respond to the needs and interests of the Stadium District's visitors, workers, and residents. Currently, the Stadium District has a maximum FAR of 3.25. This FAR is 0.5 higher than the typical Industrial Commercial FAR maximum FAR of 2.75. We request an analysis in the FEIS of increased FAR for uses within the Stadium District that are consistent with the character of the Stadium District, including lodging, innovative industries, makers spaces, entertainment uses, and similar activating uses. By allowing for additional FAR, consistent with the framework that currently exists in the Land Use Code, the City can use the Stadium District to help foster jobs and innovative uses, while granting support to the existing stakeholders who continue to bring millions to the Stadium District each year.

38-4

Consistent with prior planning efforts and decisions, we would propose properties immediately west<sup>1</sup> of T-Mobile Park remain limited to 65 feet, while the remainder of the Stadium District be increased to at least an 85-foot height limit. This will allow the Stadium District to grow in concert with the City, providing additional jobs and opportunities that will benefit the Stadium District, the larger Industrial and Maritime Lands, and the City as a whole, while responding to the unique needs of different areas within the Stadium District.

### **4. Transportation**

The Stadium District is uniquely positioned in the City, benefitting from the City and larger region's strong investment in public transportation. Due in part to the ease of access to the Stadium District and the wide variety of sporting, entertainment, and other events within the Stadium District, the area is accustomed to high volumes of pedestrian traffic. Allowing additional density in the Stadium District for activating uses will improve transportation impacts, as noted above.

38-5

We support the continued investment in public transportation and public transportation infrastructure necessary to help facilitate public transit for those visiting, working, and residing in the Stadium District. To ensure the adequacy of the future transportation investments and

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<sup>1</sup> Specifically, the parcels west of Occidental Avenue S, north of South Atlantic Street, and south of South Royal Brougham Way.

infrastructure, the FEIS should include a transportation study examining the potential transportation impacts should the existing IC-zoned and IG-zoned parcels within and surrounding the Stadium District be developed to their maximum available density as office buildings under the proposed framework.

38-5  
cont.

## 5. Housing

The Stadium District sits between light and heavy industrial uses south of the district, and residential and office uses north of the district. It is appropriate for the Stadium District to support some housing as part of that transition of uses, especially workforce housing, that will better allow those working in industrial areas to live close to where they work. The FEIS should analyze allowing workforce housing within the Stadium District.

38-6

We look forward to continued engagement in the Industrial and Maritime Lands EIS process over the next year.

Sincerely,



Fred Rivera

**Holmes, Jim**

---

**From:** Dan McKisson <danmckisson@yahoo.com>  
**Sent:** Wednesday, March 02, 2022 3:17 PM  
**To:** Stephanie Bowman  
**Cc:** PCD\_Industry\_And\_Maritime\_Strategy; Rich Austin Jr.; Terri IBU  
**Subject:** Re: Comments on Industrial & Maritime Strategy DEIS  
**Attachments:** DEIS Comment Letter.Maritime Unions.pdf; Industrial and Maritime Technical Comments.Maritime Unions.pdf

**CAUTION: External Email**

Thank you!

Sent from my iPhone

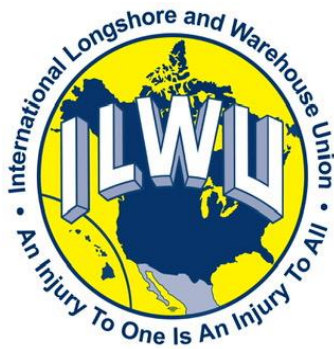
On Mar 2, 2022, at 2:51 PM, Stephanie Bowman <stephanie.bowman10@gmail.com> wrote:

Good afternoon,

Attached please find comments on the Industrial and Maritime Strategy DEIS submitted on behalf of the International Longshore and Warehouse Unions (ILWU) and the Inland Boatmen's Union.

Please let me know if you have any questions,

Best,  
Stephanie Bowman



March 1, 2022

Honorable Mayor Harrell,

The International Longshore and Warehouse Union Locals 19, 52 and 98, as well as the Inland Boatmen's Union appreciate the opportunity to provide input on the Draft Environmental Impact Statement (DEIS) evaluating proposed changes to the City's land use policy and industrial zoning. **As union workers, and those most directly impacted by zoning changes within the City's MIC's, we hope you will give considerable weight to our support for Alternative 2**, which is the only alternative that achieves the Proposal's stated goal - and our goal - of *"providing stronger land-use protections for core industrial and maritime areas and maintaining and expanding maritime and industrial jobs"*, while also providing flexibility to accommodate future trends and circumstances that may impact our city. 39-1

All regions experience economic upswings and downturns, and Seattle is no exception. Yet the one constant in Seattle has been the resiliency of the maritime industry and the commitment of its workers – especially union workers – to providing the essential services on which businesses and residents rely. When the Maritime and Industrial Strategy process began in 2019, stakeholders were blissfully unaware of the impending global pandemic and the supply chain crisis in which we are currently engulfed. **These experiences made apparent how essential our maritime workforce and infrastructure are to the residents and industries of our state.** 39-2 During the pandemic, while hundreds of thousands of workers began to work from home, our unionized workforces (as well as the truckers, logistics and warehouse workers) showed up on the job and kept essential goods – and people - moving. The supply chain crisis of the last nine months further highlights the interconnectedness of trade and the vast network that brings goods to the stores and to our homes. This network is dependent upon a well-functioning seaport, the efficient movement of freight through our city, the support of adjacent (not distance) industrial land, and a trained, dedicated workforce such as those we represent. The final EIS should recognize and be informed by these experiences, and yet the DEIS lacks any reference to these transformational events or the vital role our seaport and its workforce plays to the state's economy.

We appreciate the work by City staff that has produced the DEIS, particularly during a change of Administration. However, there are critical deficiencies we hope will be remedied before the release of the Final EIS. Generally speaking, these areas are: 1) lack of recognition of the critical public infrastructure to the state's economy that exists in the MIC's; 2) a lack of focus on the quality of jobs, particularly union jobs, created within the Alternatives, and 3) a lack of analysis on freight movement in the MIC's, especially rail and truck. 39-3

Specifically, we request the Final EIS include:

1) **Recognition of Essential Public Infrastructure in the Duwamish MIC to the state’s economy**

Nowhere in the DEIS is there a description of the essential public facilities – in particular the marine terminals in the Duwamish MIC - at which our members work, and are vital to Washington State’s economy, the most trade-dependent in the nation. Elliot Bay’s naturally deep harbor and Terminals 5, 18, 25, 30, 46, 66, 86, 90 and 91 as assets of statewide significance that are both *essential* and *irreplaceable*, and are the hub in the vast network of industrial activity that occurs within the Duwamish MIC. At the very least, the EIS needs a detailed description of these facilities and the role they play within the city, the state and the PNW, so that you and the Council have a full understanding of how the Alternatives reviewed will impact their operations, and the jobs and livelihoods of our members.

39-4

2) **Recognition of Quality Union Jobs, not simply “living wage” jobs**

Section 2.1-2 of the DEIS (page 115 in the PDF) states a goal of the proposal is to “*Increase the quantity of living wage jobs generated from activity on Seattle’s currently designated industrial lands.*” As you know, there is considerable difference between a job that simply pays a living wage, and one that is **a quality job, with living wages, benefits, worker protections, and career advancement opportunities – such as the unionized jobs of our members.** We request that the Final EIS: delineate the projected number of unionized jobs created in each Alternative; provide a definition of a quality job (versus simply a “living wage”), and that the objective of the EIS be restated to “increase the quantity of Quality Jobs. Policy leaders and the public deserve to know the full range of jobs and their benefits that are being created under each alternative, not simply the number of jobs.

39-5

1) **Recognition of Freight Mobility Issues throughout the MIC’s**

The DEIS section on “Transportation” lacks the subject of freight, including trucks and rail. “Freight” should be a stand-alone subject in the Final EIS, with appropriate analysis of all modes of freight movement, including and especially rail operations, and addressing the freight and passenger rail impacts for all Alternatives. The current heading “Auto & Freight” only addresses vehicular traffic volumes and not conditions for freight movement or facilities, which are significant throughout the MIC’s.

39-6

Finally, we appreciate the DEIS’ emphasis on racial equity, and wholeheartedly share the goal of increasing quality jobs and career opportunities for BIPOC communities, particularly in the maritime industry, where we currently have a shortage of workers. ***We ask that you, as Mayor, consider providing more resources now, regardless of the outcome of the Final EIS, to help us bring more diverse workers into the great union jobs we provide.*** We look forward to a further conversation with you about this.

Additional comments and suggestions regarding specific sections of the DEIS are included as an attachment, and we thank you and your staff in advance for incorporating these changes in the final EIS. We look forward to a robust and open conversation with you and Council as you weigh these options over the coming year, and invite you, as Mayor, to spend a day with us on the waterfront and see first-hand the complexities of our essential work. Working together, we can pursue a course which strengthens these vital industries and provides greater economic opportunity for those who need it most.

Thank you for your time and leadership on behalf of our city and region.

Sincerely,

Herald Ugles  
President  
ILWU Local 19

Chris Romischer  
President  
ILWU Local 52

Terri Mast  
Secretary /Treasurer  
IBU

Scott Reid  
President  
ILWU Local 98



**Holmes, Jim**

---

**From:** Jordan Selig <jordan@jseligre.com>  
**Sent:** Wednesday, March 02, 2022 2:52 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy; Holmes, Jim; Wentlandt, Geoffrey  
**Cc:** Lowe, Marco  
**Subject:** JSRE comment letter to the Seattle Industrial and Maritime Strategy DEIS  
**Attachments:** JSRE Seattle Industrial and Maritime Strategy DEIS comment letter March 2, 2022.pdf

CAUTION: External Email

To Whom It May Concern:

Please see attached, on behalf of J. Selig Real Estate, LLC.

Sincerely,

Jordan Selig



March 2, 2022

Geoff Wentlandt, Planning Manager  
Jim Holmes, Strategic Advisor  
Office of Planning and Community Development

**Re: Seattle Industrial and Maritime Strategy DEIS Comment Letter**

Dear Mr. Holmes and Mr. Wentlandt:

On behalf of J. Selig Real Estate, LLC (JSRE) we thank you for the opportunity to provide comment on the draft environmental impact statement for potential alternative land use concepts stemming from Mayor Durkan's Industrial and Maritime Strategy Council (Strategy Council).

As you may know, JSRE is currently proposing a rezone of a split-zoned parcel at 2501 NW Market Street (Property) in the Ballard Hub Urban Village. The Property is currently split-zoned between Industrial Commercial and Neighborhood Commercial-3 within a Pedestrian designation zone. It is also within the Ballard Urban Village and is **not in the Ballard-Interbay-Northend Manufacturing Industrial Center (BINMIC)**.

40-1

The requested rezone is indicative of the necessity to update Seattle's Industrial and Maritime Strategy to meet Seattle's growing need for more housing and commercial options. The rezone will allow for the development of 110-120 residences, including a mix of market rate and middle-income residential units, on an underutilized parcel that has only been used for outdoor storage. It has never been in active industrial use.

**JSRE is requesting that the split-zoned Property be clarified and consolidated as NC Zoning. We request that the Office of Planning and Community Development (OPCD) evaluates this option in the Final EIS.**

The rezone is consistent with the draft Land Use Goal 12 to "[d]evelop transitions between industrial areas and adjacent neighborhoods that support healthy communities, reduce adverse environmental impacts, and minimize land use conflicts" by resolving the split zone parcel in favor of more residential use within the Ballard Hub Urban Village and establishing a consistent demarcation between residential and industrial zoning using the 26<sup>th</sup> Ave NW right of way instead of split zoning on a private lot. See DEIS, Appx D, pg. 2.

40-2

The rezone advances the key Comprehensive Plan policy for industrial areas outside of manufacturing/ industrial centers, namely:

- LU 10.9 **Avoid placing industrial zones within urban centers or urban villages.** However, in locations where a center or village borders a manufacturing/industrial center, use of the industrial commercial zone within the center or village where it abuts the manufacturing/industrial center **may** provide an appropriate transition to help separate residential uses from heavier industrial uses. (emphasis added).

40-3

The Comprehensive Plan expressly states that the City should avoid placing industrial zones within urban villages like Ballard Hub Urban Village (LU 10.9). The current zoning of the Property is flatly inconsistent with the LU 10.9 intent. Clarification of the Property's zoning under a consolidated NC zone would not remove any land from a MIC. When viewed in the context of the Property and vicinity, the use of IC zoning is not the most appropriate transitional zone from the traditional industrial and maritime use to the south.

40-4

JSRE is requesting the OPCD study an option consolidating the Property under NC zoning in the Final EIS.

Respectfully,



Jordan Selig  
J. Selig Real Estate, LLC

cc: Marco Lowe, Office of the Mayor

**Holmes, Jim**

---

**From:** Tim Trohimovich <Tim@futurewise.org>  
**Sent:** Monday, January 31, 2022 1:34 PM  
**To:** Holmes, Jim  
**Subject:** FW: Seattle Industrial & Maritime Strategy Draft EIS Comments  
**Attachments:** Futurewise Seattle Industrial & Maritime Strategy Draft EIS Comments Jan 31 2022  
Final.pdf

**CAUTION: External Email**

Dear Mr. Holmes:

The [PCD Industry and Maritime@seattle.gov](mailto:PCD_Industry_and_Maritime@seattle.gov) emails address bounced. Please accept these comments n the Draft EIS.

Thank you.

Tim Trohimovich, AICP (he/him)  
Director of Planning & Law



816 Second Avenue, Suite 200  
Seattle, WA 98104-1530  
206 343-0681 Ex 102  
tim@futurewise.org  
connect:    
[futurewise.org](http://futurewise.org)

---

**From:** [Tim Trohimovich](#)  
**Sent:** Monday, January 31, 2022 1:30 PM  
**To:** [PCD Industry and Maritime@seattle.gov](mailto:PCD_Industry_and_Maritime@seattle.gov)  
**Cc:** [Alex Brennan](#)  
**Subject:** Seattle Industrial & Maritime Strategy Draft EIS Comments

Dear Staff:

Enclosed please find Futurewise’s comments on the Seattle Industrial & Maritime Strategy Draft Environmental Impact Statement. Thank you for considering our comments.

Tim Trohimovich, AICP (he/him)  
Director of Planning & Law



816 Second Avenue, Suite 200  
Seattle, WA 98104-1530  
206 343-0681 Ex 102



816 Second Ave, Suite 200, Seattle, WA 98104  
p. (206) 343-0681  
futurewise.org

January 31, 2022

Jim Holmes  
Office of Planning & Community Development  
City of Seattle  
PO Box 94788  
Seattle, Washington, 98124-7088

Dear Mr. Holmes:

**Subject: Seattle Industrial & Maritime Strategy Draft EIS Comments**

Send via email to: [PCD Industry and Maritime@seattle.gov](mailto:PCD_Industry_and_Maritime@seattle.gov)

Thank you for the opportunity to comment on the *Seattle Industrial & Maritime Strategy Draft Environmental Impact Statement* (DEIS). The Draft EIS is well done. Overall, Futurewise has concluded that the Draft EIS adequately explains the proposal, analyzes the alternatives, identifies and discloses environmental impacts, and identifies required and potential mitigation measures. We do have a few suggestions below.

41-1

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State including the City of Seattle.

**3.2.3 Air Quality and GHG Mitigation Measures pp. 3-79 – 3-80**

The Draft EIS accurately states that:

Depending on the transportation routes that are used, emissions of air pollutants from mobile sources could concentrate along routes that pass through vulnerable communities, leading to inequitable exposure to air pollution. Similar effects could be experienced with activities related to employee and material transport during the construction phase of any of the alternatives.<sup>1</sup>

41-2

One additional mitigating measure the Final EIS should consider is designating truck routes serving industrial and manufacturing areas away from residential areas especially residential areas with vulnerable populations.

<sup>1</sup> *Seattle Industrial & Maritime Strategy Draft Environmental Impact Statement* p. 3-57 (Dec.2021).



### 3.3.2 Impacts: Impacts Common to All Alternatives p. 3-94

A recent analysis of sea-level measurements for tide-gage stations, including the Seattle, Washington tide-gauge, shows that sea level rise is accelerating.<sup>2</sup> As of 2020, Seattle's sea level rise was 1.974 millimeters a year and it was accelerating at a rate of 0.038 millimeters per year.<sup>3</sup> Virginia Institute of Marine Science (VIMS) "emeritus professor John Boon, says "The year-to-year trends are becoming very informative. The 2020 report cards continue a clear trend toward acceleration in rates of sea-level rise at 27 of our 28 tide-gauge stations along the continental U.S. coastline."<sup>4</sup> "Acceleration can be a game changer in terms of impacts and planning, so we really need to pay heed to these patterns," says Boon."<sup>5</sup> The description of impacts should disclose that sea level rise is accelerating in Seattle.

The Draft EIS reports on page 3-94 that:

Under all Alternatives, proposed development in areas that are susceptible to impacts from extreme high tides would be required to comply with critical areas regulations for frequently flooded areas, which is regulated through the City's Environmentally Critical Areas (ECA) Code; the requirements of the Shoreline Master Program (SMP; Seattle Municipal Code 23.60A) also apply to development along the shoreline. Compliance with these codes may reduce vulnerability of those developments to sea level rise impacts relative to existing conditions.

It is unclear what the last sentence means. This lack of clarity is compounded by the fact that regulations for frequently flooded areas including Seattle's regulations are not effective in mitigating sea level rise as *Projected Sea Level Rise for Washington State – A 2018 Assessment* documents:

Finally, we emphasize that sea level rise projections are different from the coastal flood risk assessments performed in a typical Federal Emergency Management Agency (FEMA) study. Specifically: (1) The current study concerns future changes in sea level, whereas FEMA flood maps are based on historical observations and assume no long-term change in risk, and (2) FEMA studies are focused on one specific event – the 100-year coastal flood – and do not address water levels during normal tides or other storm intensities. Our projections, in contrast, concern the long-term change in sea level, affecting the height of the water surface at all tidal elevations as well as during storm events.<sup>6</sup>

<sup>2</sup> William and Mary Virginia Institute of Marine Science, *U.S. West Coast Sea-Level Trends & Processes Trend Values for 2020* last accessed on Jan. 28, 2022, at: [https://www.vims.edu/research/products/slrc/compare/west\\_coast/index.php](https://www.vims.edu/research/products/slrc/compare/west_coast/index.php). 2021 data should be available soon at the institute's website.

<sup>3</sup> *Id.*

<sup>4</sup> David Malmquist, U.S. sea-level report cards: 2020 again trends toward acceleration Virginia Institute of Marine Science website (Jan. 24, 2021) last accessed on Jan. 28, 2022, at: [https://www.vims.edu/newsandevents/topstories/2021/slrc\\_2020.php](https://www.vims.edu/newsandevents/topstories/2021/slrc_2020.php).

<sup>5</sup> *Id.*

<sup>6</sup> Miller, I.M., Morgan, H., Mauger, G., Newton, T., Weldon, R., Schmidt, D., Welch, M., Grossman, E., *Projected Sea Level Rise for Washington State – A 2018 Assessment* p. 11 of 24 (A collaboration of Washington Sea Grant, University of Washington Climate Impacts Group, Oregon State University, University of Washington, and US Geological Survey).

The EIS should disclose that Seattle’s flood plain regulations and master program regulations will not protect against sea level rise overall and for the subareas.

41-3  
cont.

### 3.3.3 Mitigation Measures: Other Potential Mitigation Measures p. 3-101

As was documented above, flood plain regulations do not protect against sea level rise because the elevations are based on past flood events and do not take rising seas into account.<sup>7</sup> The EIS should propose as a mitigating measure development regulation that require buildings, structures, and industrial and manufacturing sites to be elevated above the sea level rise projected to occur during the life of the facility. This will provide some protection for these facilities from the inevitable flooding caused by sea level rise.

41-4

### 3.9.2 Impacts: Impacts of Alternative 3 & Alternative 4 pp. 3-338 – 3-342

The Draft EIS does a good job of analyzing the impacts of all alternatives on housing and housing demand which appreciate. We also support the EIS including as a mitigating measure adding those areas that may have increased housing capacity to the City’s Mandatory Housing Affordability program.

41-5

However, the EIS does not analyze the impacts of allowing more housing in the proposed Urban Industrial (UI) zone on nearby industrial and manufacturing uses. Given the limited industrial lands in the city, it is important to carefully consider the impacts of nonindustrial uses on industrial and manufacturing uses. This is especially the case because as the EIS documents, industrial and manufacturing uses can adversely impact residential uses and so adding additional residential uses near manufacturing or industrial uses may result in incompatibilities that restrict existing and future manufacturing and industrial activities.

### 3.11.3 Mitigation Measures pp. 3-458 – 3-461

One of the most effective mitigating measures for cultural and archaeological resources is to require investigation by cultural and archaeological professionals working cooperatively with local Tribes and Native American groups to determine if a site contains cultural or archaeological resources before ground disturbing activities are allowed. This type of investigation provides protection for cultural and archaeological resources, can allow at least some projects to be designated to protect these resources, and can save time and money for the project proponent by reducing the potential for inadvertent discovery of cultural or archaeological resources and the high costs and time delays associated with inadvertent discovery. The EIS should add this as one of the required mitigation measures. For example, the Jefferson County Public Utility District’s (PUD) contractor building a community septic system at Becket Point in Jefferson County encountered human bones and Native

41-6

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Prepared for the Washington Coastal Resilience Project: updated 07/2019) last accessed on Jan. 28, 2022, at: [https://cig.uw.edu/wp-content/uploads/sites/2/2019/07/SLR-Report-Miller-et-al-2018-updated-07\\_2019.pdf](https://cig.uw.edu/wp-content/uploads/sites/2/2019/07/SLR-Report-Miller-et-al-2018-updated-07_2019.pdf).

<sup>7</sup> *Id.*

American artifacts.<sup>8</sup> The contractor had to stop construction. An archaeologist was called in and conducted an investigation that allowed the project to be redesigned and to be completed. However, PUD staff “estimated the delays and additional engineering incurred because of the artifacts added about \$90,000 to the project’s cost.”<sup>9</sup> At least some of that money could have been saved by an upfront archeological investigation.

41-7

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 Ext. 102 and email: [tim@futurewise.org](mailto:tim@futurewise.org).

Very Truly Yours,



Tim Trohimovich, AICP  
**Director of Planning and Law**

---

<sup>8</sup> Jeff Chew, *Jefferson PUD sticks with Beckett Point* Connections p. 8 (Washington Public Utility Districts Association [WPUDA]: Winter 2008) last accessed on Jan. 28, 2022, at: <https://www.yumpu.com/en/document/view/46547248/connections-washington-public-utility-district-association/11>.

<sup>9</sup> *Id.* at p. 9.



tim@futurewise.org  
connect:    
[futurewise.org](http://futurewise.org)

Holmes, Jim

Letter #42

**From:** Tarrance Tucker III <tarrance.d.tucker@gmail.com>  
**Sent:** Monday, February 28, 2022 1:35 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Seattle Sports Complex / Harbor Ave

CAUTION: External Email

*Good Day to You All,*

*My name is Tarrance Tucker, I am the Athletic Director at Pacific Christian Academy and a supporter for the Seattle Sports Complex. I prefer Alternative 4- Future of Industry Expanded. This allows for more flexibility in planning for new indoor sports facilities on idle properties that are on the edges of the MIC and away from shorelines.*

41-1

*West Seattle residents have endured the bridge closure along with the pandemic. The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill. If you have any questions please feel free to contact me.*

*Blessings,*

*Tarrance D. Tucker III*

Sent from my iPhone

---

**From:** Greg Vaughn <gavaughn@gmail.com>  
**Sent:** Thursday, February 24, 2022 11:41 AM  
**To:** Holmes, Jim; Wentlandt, Geoffrey; PCD\_Industry\_And\_Maritime\_Strategy  
**Cc:** Holly Golden  
**Subject:** Re: Industry & Innovation - 901/921/945 Elliott ave w - Feb 22, 2022

CAUTION: External Email

Hi Jim,

Just following up on this to be sure that you received our email re: 901/921/945 Elliott Ave W and the Industry & Innovation. Can you please confirm?

Thank you!  
Greg

> On Feb 22, 2022, at 12:20 PM, Gregory Vaughn <gavaughn@gmail.com> wrote:  
>  
> Hello Jim -  
>  
> Thank you again for taking time to chat with us about the cities exciting vision of Interbay. Attached please find our comment letter - such an exciting time for our beloved Interbay!  
>  
> Best -  
> Greg  
>  
> Scanned with TurboScan.  
>  
>  
> <Industry & Innovation - 901-921-945 Elliott ave w - Feb 22 2022 - 12-14 PM.pdf>  
>  
> Sent from my iPhone

February 22, 2022

Greg Vaughn  
GPG&C Investment Group LLC  
945 Elliott Avenue W  
Seattle, WA 98119

*Re: Comment on the Industrial and Maritime Strategy DEIS*

Dear Jim:

Thank you for taking the time to meet on February 17, 2022 to discuss my property in Interbay. As you know, my wife and I own the parcel located at 945 Elliott Avenue W, and we are under contract for the two parcels to the south (collectively, the "Property"). This would bring our combined Interbay holding to just over 95,000 sf. We've been at our orthodontics practice in Interbay for 11 years, and we renovated the other commercial spaces in our complex. We're very excited about light rail coming to our neighborhood, and we think the City's industrial lands work will help tip Interbay from a self-storage destination to a centrally-located economic hub in the City.

43-1

This comment letter is submitted in response to the Industrial and Maritime Strategy Draft Environmental Impact Statement (the "DEIS"). Under all three action alternatives, our Property is proposed to move to an Industry and Innovation ("I&I") designation. This letter (1) proposes a new framework for sites currently zoned Industrial Commercial ("IC") near light rail, and (2) makes other suggestions for the Final Environmental Impact Statement ("FEIS").

### **1. I&I Framework Near Transit**

We understand from our conversation with you there are two "flavors" of I&I contemplated. The "first flavor" described in the Regulatory Concepts Table in Exhibit 2.4-4 of the DEIS includes a base of required industrial use and a significant increase of FAR and height. You told us this concept would apply to sites currently zoned Industrial General ("IG") near light rail stations. We understand the "second flavor" of I&I would apply to sites currently zoned IC that are moving to the I&I framework. This second flavor would apply to our Property. You explained that these sites would be able to develop nonindustrial uses (like office uses) as they can under the current framework, but there would not be a meaningful increase in FAR or height.

43-2

We would encourage you to include a "third flavor" of I&I in the preferred alternative in the FEIS. This "third flavor" would apply to sites currently zoned IC within a half mile of existing and future light rail stations, and it would entail a meaningful increase in FAR and height, consistent with the increase in density already contemplated in the DEIS for sites currently zoned IG near light rail stations. Under this "third flavor," IC-zoned sites would be allowed to develop up to a "base" of flexible uses that matches the current density and use framework. Then these

sites could unlock additional development capacity by including industrial use. This approach would be consistent with the “bonus” framework already contemplated for I&I sites, and it would advance the following identified goals in Exhibit 2.1-2 of the DEIS:

- *People -- Increase the quantity of living wage jobs generated from activity on Seattle’s currently designated industrial lands.*
  - The DEIS already contemplates an increase in density in I&I areas. This “third flavor” of I&I would allow the proposed framework to better meet the goal of increasing living wage jobs by incentivizing industrial uses on sites near transit that might not otherwise include industrial uses.
- *Place -- Support industrially compatible employment dense transit oriented development at existing and future high capacity transit stations.*
  - The “third flavor” of I&I would allow the proposed framework to better meet this goal by providing more options and opportunities for dense employment near transit. By incentivizing industrial uses, it ensures “industrially compatible” development on sites that already support a dense mix of various uses.
- *Production -- Position Seattle’s industrial areas to respond competitively to new industrial and manufacturing processes and practices.*
  - A “third flavor” of I&I would recognize the variety of sites proposed within the I&I classification. Having another type of development supported in the framework allows Seattle’s industries to better respond and adapt to new processes and practices.

43-2  
cont.

For sites currently zoned IC in Interbay, we would encourage the FEIS to analyze a FAR of 6 and a height of 160 feet. The additional height is important to allow stacking of the FAR to yield appropriate floorplates and create pedestrian-friendly open spaces on sites near transit. Interbay is uniquely situated near future light rail stations, near housing stock, and near existing employment hubs. The DEIS already analyzed I&I up to this capacity. Interbay is the ideal location for bold urban planning in advance of new light rail infrastructure, and we would encourage the FEIS to explicitly address this proposed “third flavor” of I&I.

## **2. Additional Suggestions for the FEIS**

In addition to studying the “third flavor” of I&I, we would make the following suggestions for the FEIS:

- Our vision for the Property currently contemplates life sciences and lab use with activating ground-level commercial uses, which would provide much-needed amenities to help transform Interbay from a commuting corridor into a destination. Life sciences use brings dense, high-quality jobs that can further support this emerging dynamic neighborhood. We understand there could be changes to the current laboratory/research and development definition, and we would encourage you to make sure the updated definition includes life sciences lab function and would treat that use as an industrial use.

43-3

- The Regulatory Concepts Table in Exhibit 2.4-4 notes that no design review would be required in any of the three new industrial designations. We strongly support this proposal and do not think design review should be required in any industrial area, particularly within designated Manufacturing and Industrial Centers. Development in industrial areas is very different than the residential and commercial projects Design Review Boards usually review, and importantly, the City's adopted Design Guidelines are not well-suited for industrial areas.
- Maintain simple and streamlined development standards that recognize the unique characteristics of industrial development.

43-3  
cont.

These changes will support the goals stated in the DEIS and will allow for dense industrial and industrial-compatible development under the City's new industrial lands framework.

As you work on the FEIS, we would be happy to meet again to discuss the "third flavor" of I&I. We would encourage the FEIS to study the high end of the density in IC-zoned areas near current and future light rail stations. And we would also encourage the FEIS to explicitly discuss and analyze this "third flavor" of I&I to avoid any confusion and to ensure appropriate calibration of impacts and mitigation in the FEIS.

Thank you,



Greg Vaughn

Holmes, Jim

From: mweed@mainstreetep.com
Sent: Tuesday, March 01, 2022 5:59 PM
To: Holmes, Jim
Cc: 'Ted Lehmann'; 'Peter A Nitze'; Bob Gillespie; Henry@AmericanLifeInc.com; jeff@freehold.us; 'Adam Rosen'
Subject: Industrial Lands EIS Comment Letter
Attachments: IL DEIS Comment 030122.pdf

CAUTION: External Email

March 1, 2022

Sent by e-mail

City of Seattle, OPCD
Attn: Jim Holmes
P.O. Box 94788
Seattle, WA 98124-94788
Jim.Holmes@Seattle.gov

RE: Industrial and Maritime Strategy Draft Environmental Impact Statement Comments

Dear Mr. Holmes:

I wish to submit the following comments regarding the Industrial and Maritime Strategy Draft Environmental Impact Statement (DEIS). Believing this request for further detail will better inform and help decision makers develop policies to support the vision. Please expand and include:

- A fully developed quantification of the industrial land and space assumed in the zones outlined (truly how much). Understanding lands committed to public, rail and port activities are unavailable for development or redevelopment and should be excluded from this study (may reduce the current stated number by 50%). In other words, what lands are or should the study encompass. Then gather a list of what uses and employment will this space encourage and attract. Show the results of a test of the depth of those uses (which may also include technology, med tech, education, office, support retail and housing). Recognizing future business uses and space demand will not be those of the past and that is okay.
Further detail and analysis regarding work force housing to support the vision/study. This should include housing types and associated services to address the employment growth and categories projected - together with strategies, access and locational considerations. Its okay to have housing located near employment - like light rail station areas.
Quantification of the level of infrastructure investment, capital projects and circulation improvements required. With proposed funding strategies to accomplish the vision. Also leveraging off of light rail commitments.
An absolute stand regarding the importance and benefit derived from transit and all forms of transportation that transverse the MICs (that will transverse the MICs and being elevated by the Sound Transit investment being made). Standing that Transit Oriented Development (TOD) density along the lines and at station locations is imperative - a good result. That can be a catalyst that helps repair the harms of the past.
And finally, a stated strategy and commitment for direct solicitation of input from potentially affected parties throughout the policy making process.

44-1
44-2
44-3
44-4
44-5

Thank you for considering my thoughts. I look forward to engaging with your final product.

Sincerely,

Mark Weed  
A SODO Industrial Coalition Member  
(206) 949-5582



Holmes, Jim

---

**From:** Angie Aggen <angieaggen@yahoo.com>  
**Sent:** Thursday, February 24, 2022 12:04 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** EIS

CAUTION: External Email

I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. I support alternative 4.

45-1

Angie Aggen

Sent from my iPhone

Holmes, Jim

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**From:** Layla Anane <laylaranane1@gmail.com>  
**Sent:** Thursday, February 24, 2022 11:40 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** I prefer Alternative 4- Future of Industry Expanded

CAUTION: External Email

I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. I support alternative 4. Thank you!

46-1

*Regards,*



[Laylaranane1@gmail.com](mailto:Laylaranane1@gmail.com)  
Seattle WA  
206.432.1582

**Holmes, Jim**

---

**From:** Anawalt, Bradley <BAnawalt@medicine.washington.edu>  
**Sent:** Friday, March 04, 2022 1:34 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Hurrah for Alternative 4 - Future of Industry Expanded

**CAUTION: External Email**

---

**From:** Brad Anawalt <banawalt@medicine.washington.edu>  
**Date:** Thursday, March 3, 2022 at 5:52 PM  
**Subject:** Hurrah for Alternative 4 - Future of Industry Expanded

47-1

*I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. I support alternative 4.*

*Brad Anawalt*

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Holmes, Jim

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**From:** Dan Baker <dan@danbakercreative.com>  
**Sent:** Thursday, February 17, 2022 3:51 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Cc:** Lisa Corbin  
**Subject:** Seattle Industrial & Maritime Strategy Draft Environmental Impact Statement

CAUTION: External Email

Hello,

Concerning the 4 options being looked at in the Seattle Industrial & Maritime Strategy Draft Environmental Impact Statement I would like to voice my strong preference for Alternative 4, Future of Industry Expanded. 48-1

Thank you.

Dan

Dan Baker Creative  
206.937.8854  
[danbakercreative.com](http://danbakercreative.com)

**Holmes, Jim**

---

**From:** Donald Brubeck <d2brubeck@gmail.com>  
**Sent:** Tuesday, March 01, 2022 10:43 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Comments on DEIS for Seattle Industrial & Maritime Strategy  
**Attachments:** 220302 Comments DEIS Industrial Maritime.pdf

**CAUTION: External Email**

Please accept the attached comments on the DEIS for the proposed Seattle Industrial & Maritime Strategy.

Don Brubeck  
5730 SW Admiral Way  
Seattle WA 98116

March 2, 2022

TO: Seattle Office Planning & Community Development  
[PCD Industry And Maritime Strategy@seattle.gov](mailto:PCD_Industry_And_Maritime_Strategy@seattle.gov)

FROM: Donald Brubeck

RE: Comments on DEIS for the Seattle Industrial & Maritime Strategy.

Please accept these comments on the DEIS for the Seattle Industrial & Maritime Strategy (the Strategy):

### General comments

1. June 2021 Council Recommendations from the Advisory Council and the Strategy website begin with a land acknowledgement that includes the Duwamish Tribe. The Advisory Council Recommendations introduce the document by saying that it “centers opportunities for working people, especially Black, Indigenous, People of Color (BIPOC)...” The DEIS Executive Summary introduction on p. 2 states that the strategy has “a focus on promoting equitable access for Black, Indigenous, People of Color (BIPOC) community members, ...”. The Duwamish Tribe’s Longhouse and Cultural Center is in the Duwamish MIC. Ancestral tribal lands and archeological heritage are within the MIC’s. However, the Duwamish Tribe and other affected indigenous tribes were not represented in the development of the Strategy, and the Strategy does not include anything specific to the interests of the tribes.

49-1

The lack of tribal representation in development of the proposed Strategy makes the land acknowledgement and introductory statements merely performative lip service. The City should remedy this omission by engaging in consultation with the tribes and making revisions to the DEIS and the proposed Strategy that respond to the Duwamish Tribe’s recommendations and those of other affected Tribes.

2. Including parts of West Seattle and all of South Park in areas labeled “Georgetown” or “SODO” is confusing and misleading. The Duwamish MIC map labeling and region naming should be revised to distinguish areas west of the Duwamish River by their established place names.

49-2

**Comments on section 3.10 Transportation**

1. This is a planning document, so the document should include and consider impacts of planned active transportation networks of trails, multi-use paths, on-street bike lanes and sidewalks. The map of bike routes from the 2014 Seattle Bicycle Master Plan and more recent revisions from current Bicycle Master Plan Implementation Plans should be included.
2. Transit, biking and walking are necessary for workers to commute to maritime and industrial businesses and for people transiting the MIC's. For example, all bike and walking routes from West Seattle to the rest of Seattle go through the Duwamish MIC and coincide with truck and rail routes. 49-3
3. Mitigation measures should be included to avoid the DEIS stated Outcome that "there would be significant unavoidable adverse impact to active transportation and safety under the action alternatives." Gaps in pedestrian and bike routes can and must be remedied to meet the transportation and environmental justice goals of this Strategy and to meet the goals of other adopted City policies and plans.
4. The following should be included as strategies to meet the objectives for safe, equitable, convenient, and environmentally sustainable transportation in the MIC's:
  - a) Full implementation of the Bicycle, Pedestrian and Transit Master Plans as well as the Freight Master Plan, with prioritization given to improvements at hazardous areas identified in the Bicycle and Pedestrian Safety Analysis. Increasing the current level of funding to accomplish expedited implementation should be included as a strategy. 49-4
  - b) Implementation of the Design Guidelines in Appendix C of the Freight Master Plan for safety for pedestrians and bike riders on streets with heavy truck traffic, including all designated Major Truck Streets. These Design Guidelines should be added to the Streets Illustrated manual, and should be referenced in the proposed Strategy.
  - c) Prioritizing construction of sidewalks or shared-use paths between places of employment and bus stops and light rail stations.
  - d) Replacement or implementation of phase 2 retrofit of the Ballard Bridge to include a shared-use walking and biking path meeting current design standards.

- e) Initiation of transit service along streets such as West Marginal Way SW to serve employees and customers of industries and maritime businesses.
- f) Implementation of safe bike routes from the First Avenue S Bridge through Georgetown to downtown.
- g) Improving pavement condition and drainage should be considered a strategy for safety and ease of using active transportation as well for as motor vehicle transportation. Smooth pavement without potholes enables cyclists to keep to a predictable straight track and allows all road users to focus their attention more on other traffic and less on avoiding potholes.
- h) Active transportation should be included under Transportation Systems Management and Operations (TSMO) as a strategy to reduce single occupant vehicle use and optimize roadway use for freight and transit. More people using bikes and walking to travel to, from and through the MIC's frees up roadway capacity for freight and transit. Active transportation should not be treated as if it is just a recreational activity and an end in itself. Active transportation should be viewed as an alternative to automobile transportation and a complement to transit. When people choose to walk or bike or to use scooters to get to a bus stop instead of drive, that is not a "secondary benefit" of active transportation. It is a primary benefit. It is also the most cost-efficient mode switch from SOV travel, compared to adding bus, light rail, heavy rail or water taxi transit capacity. The implementation of the entire Seattle Bicycle Master Plan network would cost a tiny fraction of just one station-to-station segment of Sound Transit's ST3 project. Cities around the world in all kinds of climates and topography have chosen to enjoy a mode split that includes more than 25% of all trips by bike. Seattle could make this choice.

49-4  
cont.

#### 5. Significant Unavoidable Adverse Impacts:

Using the passive voice in the DEIS to say that "it is expected that the Action Alternatives could have significant adverse impacts to active transportation" is unacceptable. The adverse impacts include deaths and life-changing injuries to people walking and biking. The City of Seattle should not passively accept death and serious injuries as a cost of doing business. The Strategy should be revised to use the *active* voice to propose measures that will eliminate adverse impacts on people using active transportation. The Strategy should use active transportation as one of the core strategies to accomplish the objectives for the maritime and industrial centers.

49-5



**Comments on 3.11 Historic, Archaeological, & Historical Resources**

1. The Duwamish Tribe has for thousands of years lived in, and still is living in, the land designated by the City for industrial and maritime use. Other tribes have treaty rights for fishing in the area. 49-6
2. The Strategy’s highlighted key mitigation of “developing histories of the study area centering indigenous perspective” is woefully inadequate. This strategy would continue the white settler myth of the “vanishing Indian”. It assumes that indigenous people have a history but no present or future. The indigenous people and tribes do not need the City to “develop histories” for them. The Duwamish Tribe and other affected Tribes should be actively involved in development of this Strategy. Mitigation should include an emphasis on archeological investigations in consultation with the tribes, and tribal access to ancestral lands that are undergoing planning studies or development. 49-7
3. The Strategy should require site investigations and development to follow best practices for archaeological requirements in the discovery and preservation of cultural and historical artifacts related to the Indigenous tribes historically associated with these articles and their release to the proper tribes including the Duwamish Tribe at the Duwamish Longhouse & Cultural Center.

Thank you for the opportunity to comment.

Sincerely,

Donald Brubeck  
5730 SW Admiral Way  
Seattle, WA 98116

Holmes, Jim

**From:** Jack Burg <jack@montlakemousse.com>  
**Sent:** Monday, February 28, 2022 8:39 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Alternative 4 - Future of Industry Expanded

CAUTION: External Email

To Whomever It May Concern,

Thanks for your attention,

*I prefer Alternative 4- Future of Industry Expanded. This allows for more flexibility in planning for new indoor sports facilities on idle properties that are on the edges of the MIC and away from shorelines. West Seattle residents have endured the bridge closure along with the pandemic. The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill.*

AND

*I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. I support alternative 4.*

Jack Burg  
206-972-1345  
[Jack@MontlakeMousse.com](mailto:Jack@MontlakeMousse.com)

50-1

**Holmes, Jim**

---

**From:** Erica Bush <erica.a.bush@gmail.com>  
**Sent:** Wednesday, January 26, 2022 10:43 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Industrial and Maritime Strategy Feedback

CAUTION: External Email

To Whom It May Concern,

I have been a longtime Duwamish Valley resident and business owner. I am one of the few people who live in SODO and am also on the bicycle and pedestrian safety group Duwamish Valley Safe Streets.

The action alternatives are drastically needed in this area. Our housing shortage can't handle the growth of jobs without available affordable housing within the city limits. How can we expect to provide equitable jobs when no one can afford to get to work? Furthermore this area has been plagued by mono uses for too long. The Duwamish Valley is a rich area ecologically and socially and needs to step into the 21st century and work in conjunction with the rest of our city.

51-1

This can be an area that is safe to walk and ride bikes in, it can be an area you live in (my neighbors and I have been happy here for a very long time). People need to take precedent over industrial uses that have historically destroyed this area and displaced communities for generations. There are wonderful things this huge portion of Seattle could be used for and it's being curtailed by unnecessary constraints.

Please take action to better use this area and make it a part of our city that we're proud of.

- SODO Advocate

Holmes, Jim

From: Clark, Justin <Justin.Clark@wsp.com>  
Sent: Monday, February 21, 2022 3:30 PM  
To: PCD\_Industry\_And\_Maritime\_Strategy  
Cc: Holmes, Jim; Wentlandt, Geoffrey  
Subject: RE: Comments on the Industrial Maritime DEIS

CAUTION: External Email

Hi Jim and Geoff – adding the two of you, as I received an error when I sent my comments directly to the provided email address for comments.

- Justin  
ph. 206-382-5271  
[Justin.Clark@wsp.com](mailto:Justin.Clark@wsp.com)

From: Clark, Justin  
Sent: Monday, February 21, 2022 12:06 PM  
To: PCD\_Industry\_and\_Maritime@Seattle.gov  
Subject: Comments on the Industrial Maritime DEIS

Hello Industry & Maritime team,

I appreciate the chance to comment on the DEIS.

I am providing my strong support for **Alternative 4: Future of Industry Expanded**, and asking that the plan even push more aggressively BEYOND this alternative to increase density and vibrancy around transit stations within industrial zones. We are investing HUGE sums of money as a region and city to build out our light rail system, and way too many of those stations have been built within and are being planned within industrially zoned lands. This investment is not compatible with the current uses around these stations and there is much room to make adjustments to have transit oriented vibrancy in these industrial areas without creating displacement of industrial uses. We as a city just have to be much more intentional about what the future of industrial looks like, and then plan, partner, and incentivize to make that a reality.

52-1

While I understand housing should not be concentrated around heavy industrial, there are some types of housing that make a lot of sense within these zones, especially when they are transit adjacent. Please include ability for housing to be constructed in thoughtful ways.

The last big takeaway for me are our current industrial lands are not doing well, we need a vision for what “future industrial” looks like, and implementation and follow through to match the vision. Vacancy rates are not a useful tool to indicate how vibrant industrial zones are performing – strip malls, mini-storage, fast food restaurants are not what this land is intended for. And many land uses that only fit the current industrial uses if you squint are creeping into these zones because the city has not set a clear path on what they want these areas to be in the future (case in point: Ballard’s land around 14<sup>th</sup> Ave). We need to leverage this huge transit investment in the City by creating station-adjacent uses that will attract riders at day and night.

52-2

Thank you for your consideration of my comments.

Justin Clark, P.E., PMP  
(Pronouns: he, him, his)  
Project Manager | Senior Lead Bridge Engineer



Email: [Justin.Clark@wsp.com](mailto:Justin.Clark@wsp.com)  
ph. 206-382-5271  
1001 Fourth Avenue, Suite 3100  
Seattle, WA 98154

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NOTICE: This communication and any attachments ("this message") may contain information which is privileged, confidential, proprietary or otherwise subject to restricted disclosure under applicable law. This message is for the sole use of the intended recipient(s). Any unauthorized use, disclosure, viewing, copying, alteration, dissemination or distribution of, or reliance on, this message is strictly prohibited. If you have received this message in error, or you are not an authorized or intended recipient, please notify the sender immediately by replying to this message, delete this message and all copies from your e-mail system and destroy any printed copies.

-LAEmHhHzdJzBITWfa4Hgs7pbKl

Holmes, Jim

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**From:** Lisa Corbin <lcorbin@gmail.com>  
**Sent:** Wednesday, March 02, 2022 12:38 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Alternative 4 - Future of Industry Expanded

CAUTION: External Email

To the OPCD,  
I prefer Alternative 4- Future of Industry Expanded. This allows for more flexibility in planning for new indoor sports facilities on idle properties that are on the edges of the MIC and away from shorelines. West Seattle residents have endured the bridge closure along with the pandemic. The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill.  
Thank you,  
Lisa Corbin

53-1



**Holmes, Jim**

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**From:** Katherine Dee <katedee@gmail.com>  
**Sent:** Monday, February 28, 2022 4:36 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Comment on the Draft EIS

**CAUTION: External Email**

To whom it may concern:  
I appreciate your hard work on this topic. I prefer Alternative 4- Future of Industry Expanded. This allows for more flexibility in planning for new indoor sports facilities on idle properties that are on the edges of the MIC and away from shorelines.

54-1

West Seattle residents have endured the bridge closure along with the pandemic. The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill.

Thanks for your time and consideration.  
Kate Dee  
West Seattle resident

## #2

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Saturday, February 19, 2022 12:46:52 PM  
**Last Modified:** Saturday, February 19, 2022 12:48:16 PM  
**Time Spent:** 00:01:24  
**IP Address:** 73.193.120.154

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Page 1: Draft EIS Comment

### Q1

After reviewing the Draft EIS, send us a comment to suggest how the analysis can be improved or any other concern or question you may have related to the Draft EIS.

54-2

I have been watching as the CEM site on harbor avenue sits as an empty pile of concrete. I have been hoping for development of the site into a sports complex we can all use. Please consider adopting alternative 4 that would allow increased building size and expanded use of industrial zones.

The entire community would benefit.  
Thanks for your time and consideration.

---

### Q2

Please provide your name and email address.

Name **Kate Dee**  
Email Address **katedee@gmail.com**

---



**Holmes, Jim**

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**From:** Paul Devine <PaulDevine@msn.com>  
**Sent:** Wednesday, March 02, 2022 1:16 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Alternative 4 - Future of Industry Expanded

**CAUTION: External Email**

I prefer Alternative 4- Future of Industry Expanded. This allows for more flexibility in planning for new indoor sports facilities on idle properties that are on the edges of the MIC and away from shorelines.

West Seattle residents have endured the bridge closure along with the pandemic. The dragging of the feet in fixing the West Seattle Bridge is outrageous. Don't you recognize how much we West Seattleites pay in property taxes?

55-1

The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill.

It is time to make use of this location. There is no reason to wait any longer.

Paul Devine  
4715 SW Walker Street  
Seattle, WA 98116  
Tel 206-938-8262  
[pauldevine@msn.com](mailto:pauldevine@msn.com)

Holmes, Jim

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**From:** Anne Dickinson <anne.dickinson@comcast.net>  
**Sent:** Monday, February 28, 2022 2:00 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Draft EIS

**CAUTION: External Email**

I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 SF subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. I support alternative 4. 56-1

Anne Dickinson  
(206) 334-4200 cell

Holmes, Jim

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**From:** Ann Dillon <dillons@msn.com>  
**Sent:** Tuesday, March 01, 2022 10:32 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Alternative 4 - Future of Industry Expanded

**CAUTION: External Email**

I prefer Alternative 4- Future of Industry Expanded. This allows for more flexibility in planning for new indoor sports facilities on idle properties that are on the edges of the MIC and away from shorelines. West Seattle residents have endured the bridge closure along with the pandemic. The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill.

57-1

Thank you

Holmes, Jim

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**From:** J DiMartino <janiedimartino@me.com>  
**Sent:** Thursday, February 24, 2022 12:45 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Comment on EIS draft for the West Seattle landfill

CAUTION: External Email

To Whom it May Concern,

I am writing in support of the project for a new indoor sports facilities.

I have so many things I could voice my opinion on in the city of Seattle but I don't have a lot of solutions for our many, many problems. What I can put my voice to is supporting the building of a community recreation facility where the former West Seattle landfill (dump in my day) was. As a tax payor, I'm not sure what I am paying for anymore. Certainly not the response to the burglary in my home and the ongoing damage and violence at my place of work.

However, using this land for the people of Seattle for recreational purposes is a positive and excellent use of some of our tax payor money. Our money seems to disappear into Bridges, roads, tents, drugs, defunding the police, a terrifying and terrible city council, ignoring graffiti, etc. Supporting the people who are trying to fix and live in this city is important to me to keep building good things. Keep supporting our communities. Create positive spaces. Focus, for a minute, on a positive community project.

58-1

From the very long evaluation, I support alternative 4 - Future of Industry Expanded and all that entails.

As part of an active family living and working in Seattle, I ask you to use this idle land for the maximum use for indoor sports and recreation uses. This can be a fresh and important part of the West Seattle park area.

Thank you,

Janie DiMartino

Holmes, Jim

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**From:** Raymond Dubicki <raydubicki@mac.com>  
**Sent:** Tuesday, March 01, 2022 2:04 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Industrial and Maritime Strategy DEIS Comments  
**Attachments:** Dubicki - Industrial Maritime DEIS Comments.pdf

CAUTION: External Email

Hi,

Attached are my comments for the Industrial and Maritime DEIS. Would you be so kind as to let me know that they are received and the file is readable? Thanks.

Ray

March 1, 2022

Seattle Office of Planning and Community Development  
P.O. Box 94788  
Seattle, WA 98124-7088

RE: Comments Draft Environmental Impact Statement for Seattle's Industrial and Maritime Strategy

Dear OPCD staff,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for Seattle's Industrial and Maritime Strategy.

First, I would like to boost the comments submitted by Share the Cities, Duwamish River Community Coalition, Seattle Cruise Control, and the Georgetown/South Park Advisory Group. Their comments address many very specific concerns of those living and working in industrial lands.

In these comments, I want to emphasize the importance of additional scrutiny regarding the impacts of the systemic racist policies that created Seattle's industrial land and exacerbated the disparate impacts of pollution and disinvestment on nearby underserved neighborhoods of color.

59-1

The idea to rezone the city's industrial lands is a good one. However, the impacts listed in the Draft EIS are not addressed by the mitigations proposed. There is a disconnection between the greenhouse gasses, soil contamination, and water pollution created by the city's industrial zones and their area of impact. That is because the underlying boundaries used to create the EIS study area and subareas are relics of inequities the EIS purports to address. The Environmental Impact Statement must struggle with the racialized history that formed our industrial areas in the first place.

## **I. Comments on the Proposed Zones**

Seattle's existing industrial zoning designations are failing. The General Industrial zones are worded so broadly that grocery stores and mini-storage proliferate instead of employers who manufacture things. Car-intensive commercial uses are taking up space next to ports, rail, and vital infrastructure that cannot be moved or replaced.

The three proposed industrial zoning designations appear to recognize the changing needs of industry and its employment role. However, the actual text of the zones is not included in the document. These comments look to add information to the EIS in order to steer the creation of the zones during the legislative process.

59-2

1. Manufacturing, Maritime, and Logistics (MML) zone will replace most of the current general industrial zoning. As such, the EIS should be more explicit on which uses will become nonconforming uses. Not all commercial uses are unwelcome in industrial zones.

Additionally, recent exceptions have been granted for developments such as the WNBA Storm practice facility. In lieu of extending an exemption and adding text to the hefty zoning ordinance, the code should be written to accommodate such uses. A comprehensive list of uses with active exemptions should appear in the EIS.

59-2  
cont.

2. The Urban Industrial (UI) zone will be established at the boundaries between industrial areas and urban villages. As discussed further below, Urban Villages are separated from waterways by industrial land. That would make some of the UI zoned properties the most desirable locations in the city for new homes, particularly penthouse units on top of a quasi-industrial space. This would accelerate issues of pricing out legacy industry in neighborhoods where that is already most acute. The EIS should be clearer on the definition of “industry supportive housing,” provide examples from other locations of housing on top of industry, and propose thresholds for mixed use buildings.

59-3

3. Industrial Innovation (II) zones are for areas around transportation hubs where office and manufacturing can coexist with transit. This zone is very exciting with mixed uses between industrial and commercial as well as specifically stated support for pedestrian and cycling infrastructure. However, the current neighborhood plans and Comprehensive Plan have multiple provisions to separate bike and pedestrian paths from industrial areas. The EIS does not examine where the II zone expressly contradicts existing neighborhood plans. Proposed changes to the Comprehensive Plan do not specifically address this issue. More broadly, the EIS should develop a complete list of the neighborhood-level comprehensive plan recommendations impacted by these zoning changes and analyze whether they conform or contradict the Draft Comprehensive Plan Goal and Policy Language found in Appendix D.

59-4

## II. Comments on the proposed Alternatives

In attending meetings discussing the EIS publicly, I have seen many Seattleites are confused that the Draft EIS is not about the potential zones. The EIS Alternatives examine how much the new zones will be laid out across the city’s existing industrial areas. This can be a smart way of setting up the EIS because it focuses the discussion on specific locations rather than ephemeral concepts in zoning. But the document can be clearer about the distinction.

59-5

I support Alternative 4 - The Future of Industry Expanded, only because there are no alternatives that more liberally use the UI and II zones across larger portions of the city. With time, those zones must be used outside of the narrow constraints of the current industrial areas.

As the City Council moves to adopt the new industrial zones and the accompanying zoning map, they will be able to pick and choose between parts of the Alternatives. That means the boundaries can end up erratic and narrow due to legislative horse trading. The EIS must do a better job establishing why areas change under each of these Alternatives, and which areas should be treated as a cohesive cluster.

At the neighborhood level, the proposed maps do not offer a picture of cohesiveness. Besides raw acreage or numbers of houses, what does it mean if blocks are divided? Ballard’s Brewery District - the area north of Leary Avenue on either side of 14th Avenue - is a good example. Alternative 2 puts it in MML, Alternative 3 in Urban Industrial, and Alternative 4 sets it as Industry and Innovation. But the legislative process can split that apart. The EIS does not strongly justify what, if anything, is keeping these clusters together. (It should be kept together.)

59-6

Speaking of splitting the baby, it must be said that Alternative 1 should be considered a non-starter in its entirety. Even a compromise where some of the current industrial zones are maintained in certain areas should be dismissed completely. The current zoning ordinance is 1,400 unreadable pages. Adding a couple hundred more for new zones without removing any of the existing would be idiotic. The EIS should reflect

59-6

### III. Comments on Boundaries

While the proposed EIS Alternatives offer needed updates to industrial and manufacturing centers, they are stuffed within the existing boundaries of the current industrial zones. And that is the source of a much deeper problem. The city's industrial boundaries themselves carry the history of segregation that cannot be washed away with a cursory equity analysis.

This issue was brought up in scoping. In Appendix A, the EIS drafters respond to scoping comments that requested including an overview of historic land use actions by saying "The EIS will include a review of past plans and policies...Mitigation measures that further equity and environmental justice can be linked to this objective." (Scoping Report 4) In response to the request that the scoping include more area than just the existing industrial areas, the EIS states: "The City of Seattle, as the Lead Agency, has the prerogative to define the range of alternatives it studies in the EIS." (Scoping Report 7)

SDCI staff and consultants have made an extensive analysis of Seattle's industrial areas across 14 different categories, including land use, public services, geology, and noise. Each of these sections deep dives into the topic and compares possible impacts of each alternative.

But the EIS doesn't tell the story of how these industrial zones came to exist in their current locations. Take this paragraph from the Land Use section:

59-7

"Historical land use decisions also led to the location of multi-family housing in areas bordering industrial lands that caused environmental justice harms. Seattle's first zoning ordinance in 1923 and its major update in 1956 located multi-family residential districts at the edges of rail lines, industrial districts, and manufacturing districts. Relatively less affluent renters were exposed to noise and air quality and other impacts, while single family districts removed from the edges of industrial areas were not. The continued pattern of multi-family housing and zoning districts bordering MICs. Continues to be evident today in areas including Interbay and the northeast edge of Ballard." (DEIS 3-241)

While accurate, this obscures two important facts. First, not only were apartments located near industrial areas, but both industrial and multi-family uses were **excluded** from a vast majority of the city. Second, the pattern is not just evident today. It is our city's current policy.

Between racially restrictive covenants and apartment bans written into zoning, multifamily housing was actively pushed out of many Seattle neighborhoods. Exclusion from the remaining city is important in understanding the issues that the EIS is trying to address. The document lists six emerging factors affecting industrial lands:

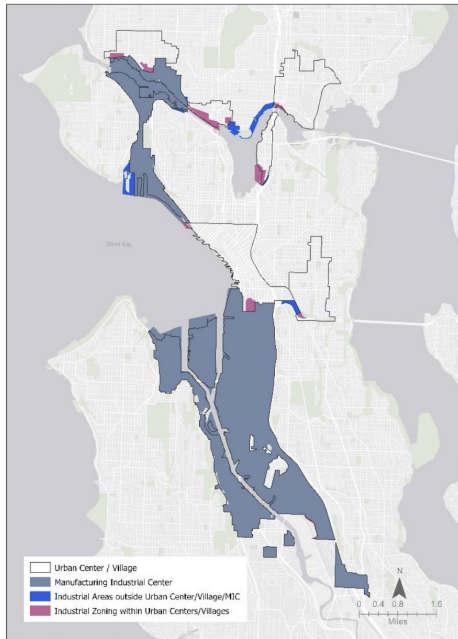
- Pressures to convert industrial lands
- Emerging technologies and processes
- Unintended development
- Pending port, transportation, and new industrial building typology
- Environment and climate change
- Equity and accessibility



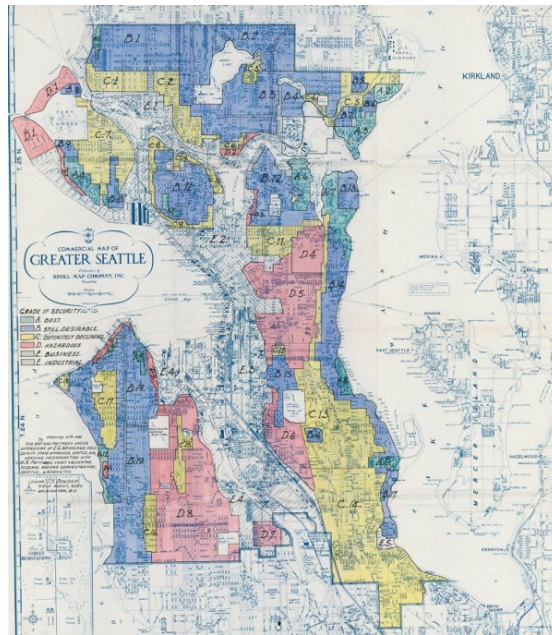
Three of these – conversion pressures, unintended development, and equity – are directly tied to forcing apartments and shops and factories to compete over a small portion of the city’s land. The fourth, Environment and Climate Change, is deeply tied to how pollution is concentrated in small areas and poisoning neighboring communities of color. There is not a map of the entire city in the EIS. They all cut off just above Greenlake. This is a city-wide rezoning of industrial lands, yet it does not show the whole city. It is impossible to develop policies that address land use and zoning issues without once mentioning the other side of the story – the portion of the city devoted exclusively to single-family housing.

More broadly, the EIS mentions patterns of exclusion and redlining as if they happened in the past. Exclusion and redlining are current issues supported by current policy. In Exhibit 3.8-2, the EIS did an amazing thing by combining the Urban Villages map with the Industrial Centers map, two that are not normally put together. They show that density never touches water, only industrial waterfront. Beaches are reserved for Seattle’s homeowners.

Exhibit 3.8-2 Future Land Use Map for Industrial Areas Within and Outside MICs



Source: City of Seattle, 2021.



59-7  
cont.

Examining Exhibit 3.8-2 (left above) side-by-side with the 1930’s Home Ownership Lending Corporation map (right above) that established mortgage patterns which “redlined” communities of color shows that nothing has changed in 100 years of Seattle’s zoning. Industrial and downtown neighborhoods are left unshaded. “Undesirable” neighborhoods, still the city’s most diverse, were in red. The boundaries of the industrial zones and urban villages are the same lines that separated White mortgagees from Black and industrial neighborhoods in the 1930s. (HOLC map from The Seattle Civil Rights and Labor History Project, University of Washington)

In the Seattle 2035 Comprehensive Plan from 2015, the Urban Village strategy is described as “places that **already have** active business districts and concentrations of housing” (Seattle

2035 10, emphasis added). This continued the Urban Village concept that was adopted in the 1994 comprehensive plan, where the first goal was to “Maintain and enhance Seattle’s character” which it started to define as “large single family areas of detached houses.” (Toward a Sustainable Seattle 5) That plan never once mentioned how many of those single family neighborhoods had restrictive covenants written into their deeds. The comprehensive plans did not break any barriers, they reinforced them and continue as the basis for zoning we have today. The EIS states “since MICs were established in 1994, there have not been large-scale alterations to their geographic boundaries.” (DEIS 1-6) That same recognition can go back to the HOLC maps decades earlier.

The Draft EIS struggles to explain how new zones will overcome the disparate impacts to communities burdened by the impacts of industry. As extensively documented by the Duwamish River Community Coalition in their comments, many of the EIS mitigation measures come down to “new zones will prompt construction of new buildings that will be better.” No matter how good a new building is, it cannot surpass the boundaries it is dropped into. And those boundaries have remained unchanged for 100 years.

59-7  
cont.

The industrial boundaries are steeped in systemic racism and continued by this Industrial and Maritime Strategy. The city is once again specifying factories and manufacturers are only allowed in certain areas that are next to communities of color. The boundaries are the segregation. This EIS maintains each and every one of them.

And that’s the reason it’s vitally important that this story be told within this EIS. There are 100 years of policies squeezed between that first Seattle zoning code in 1923 and today. Each one builds upon the last. Unquestioningly carrying forward the framework of racial segregation and exclusion from one copy to another is just putting a new book cover on the same redlining manual. This EIS fails to recognize that chain, much less break it.

It is indeed the city’s prerogative, as the Lead Agency, to define the range of alternatives it studies in the EIS. But that is exactly the same prerogative it has used to segregate and redline for the last century. While this EIS cannot single-handedly undo that damage, it can make some steps in the right direction:

1. Add documentation, analysis, and maps that connect Seattle’s historic segregation, redlining, and exclusion to the present day location of industrial uses.
2. Complete a city-wide analysis of zoning that looks specifically at the ways commercial and multi-family exclusions in other parts of the city lead to the competition for industrial land. Use maps of the entire city.
3. Examine which recommendations and boundaries are carried over from older plans that have never been vetted for equity or impact, including transportation and public facilities.

#### **IV. Conclusion and Summary of Comments**

These comments are not offered to summarily reject or undermine the Industrial and Maritime Strategy or the draft EIS. As said, the proposal to update the city’s industrial zoning is good. The proposed zones have a lot of potential to reflect the new realities of manufacturing. They offer a chance for employers to be participants in the neighborhoods rather than kept segregated and apart. I look forward to making further comments during the legislative process to draft and locate the zones in order to prevent petty, classist, or biased exceptions. But the proposal is strong and having it on the table is a massive step forward.

59-8

However, the EIS is missing any recognition that the lines themselves are part of the issue. These historical boundaries made their own problems, and we are left to unquestioningly

continue being constrained within them. To address the impacts of the Seattle Industrial and Maritime Strategy, the Environmental Impact Statement must make robust efforts to understand history and the sources of inequity in shaping land use decisions. Without those components, the mitigations proposed are simply inadequate, and the City will set itself up for unlimited challenges as it moves ahead with this rezoning and the coming 2024 Comprehensive Plan.

59-8  
cont.

Please amend the Draft Environmental Impact Statement to address the following issues:

1. Add documentation, analysis, and maps that connect Seattle’s historic segregation, redlining, and exclusion to the present day location of industrial uses.
2. Complete a city-wide analysis of zoning that looks specifically at the ways commercial and multi-family exclusions in other parts of the city lead to the competition for industrial land. Use maps of the entire city.
3. Examine which recommendations and boundaries are carried over from older plans that have never been vetted for equity or impact, including transportation and public facilities.
4. Specify which groups of zoning changes within each alternative should be treated as divisible or as a cluster/group and describe why. (i.e. what are the issues with splitting Ballard Brewery District between UI and MML?)
5. Engage communities to more clearly explain the purpose of this EIS, the difference between the proposed zones and the Alternatives, and the legislative steps yet to come.
6. Clarify which existing and proposed uses in the industrial areas will be considered nonconforming under the MML, II, and UI zones. Provide a comprehensive list of uses with active exemptions or that operate under amended development standards. (i.e. Storm practice facility)
7. Clarify the definition of “industry supportive housing,” provide examples from other locations of mixed use housing/industrial, and propose thresholds for mixed use buildings.
8. Develop a complete list of the neighborhood-level comprehensive plan recommendations in areas that will be impacted by these zoning changes, and analyze whether they conform or contradict the Draft Comprehensive Plan Goal and Policy Language found in Appendix D.

59-9

59-10

59-11

59-11

59-12

59-13

Thank you for your attention in this matter.

Sincerely,



Raymond Dubicki  
raydubicki@mac.com  
Ballard

Holmes, Jim

**From:** Kathy Dunn <dunkathy@gmail.com>  
**Sent:** Wednesday, March 02, 2022 10:29 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Comments on DEIS for Seattle Industrial & Maritime Strategy

**CAUTION: External Email**

I live in West Seattle. I commute between West Seattle and greater Seattle by e-bike for medical appointments, classes and shopping. My route takes me through industrial and maritime areas.

West Seattle has limited medical services. Most medical facilities, specialists, etc. are located outside our peninsula. Vehicle traffic is heavy getting on and off of the West Seattle peninsula and motorized private and freight traffic is a major contributor to air and water pollution, unhealthy noise levels, and climate warming that will eventually exacerbate our growing climate crises.

60-1

Seattle needs to urgently strive to reduce the use of fossil fuels in its industrial and maritime sector. Traveling through these areas using low carbon impact modes such as e-bicycles should be made safe from heavy vehicles and free from toxic air quality. Slowing down freight and private vehicle traffic through areas such as West Marginal Way, Spokane Street and East Marginal Way would significantly reduce the burning of fossil fuels and this must be accomplished by road design because posted speed limits are not working to accomplish this goal.

60-2

At minimum, Seattle should not delay reducing southbound general traffic to one lane on West Marginal Way between the West Seattle Bridge and the Duwamish Longhouse toward the goal of reducing fossil fuel burning environmental impacts. Seattle should resist unfounded claims from Port and freight representatives that traffic calming impacts mobility in any significant way. People using bicycles for transportation should not be forced to ride on a narrow sidewalk next to speeding traffic and should be given a safe connection between trails in West Seattle and the West Duwamish Trail.

Seattle needs to work actively and quickly to carve out and develop safe active transportation routes throughout the industrial and maritime areas of West Seattle, the Duwamish Valley, Georgetown, South Park and SODO.

Kathleen Dunn  
6209 SW Admiral Way  
Seattle, WA 98116

#3

Letter #61

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Saturday, February 19, 2022 1:38:54 PM  
**Last Modified:** Saturday, February 19, 2022 1:42:22 PM  
**Time Spent:** 00:03:27  
**IP Address:** 67.185.62.98

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Page 1: Draft EIS Comment

**Q1**

After reviewing the Draft EIS, send us a comment to suggest how the analysis can be improved or any other concern or question you may have related to the Draft EIS.

61-1

The EIS ought to consider how future zoning counteracts the existing racialized exclusionary zoning history. Nearsightedness will only build upon and extend a history of racist and classist zoning in Seattle.

---

**Q2**

Please provide your name and email address.

Name **Xen Eldridge**  
Email Address **junkxen@gmail.com**

---

Holmes, Jim

---

**From:** Tony Fragada <tfragada@yahoo.com>  
**Sent:** Wednesday, March 02, 2022 8:47 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** EIS Comments

**CAUTION: External Email**

*I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. I support alternative 4.*

62-1

Tony Fragada

Holmes, Jim

Letter #63

**From:** Christine Frishholz <cfrishholz@comcast.net>  
**Sent:** Thursday, February 24, 2022 11:44 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Draft EIS - I support Alternative 4

**CAUTION: External Email**

I prefer Alternative 4- Future of Industry Expanded. This allows for more flexibility in planning for new indoor sports facilities on idle properties that are on the edges of the MIC and away from shorelines. West Seattle residents have endured the bridge closure along with the pandemic. The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill.

63-1

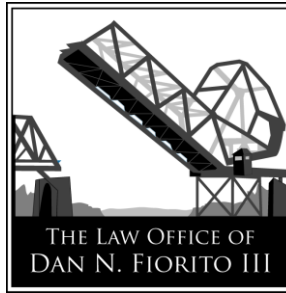
Thank you for your consideration,  
Christine

Christine Frishholz (she/her)

206.280.7279

Website: [www.theciceronegroup.com](http://www.theciceronegroup.com)





January 31, 2022

TO: City of Seattle Office of Planning and Community Development  
FROM: Dan Fiorito  
RE: Comments In Support of Urban Industrial Land Use and Workforce Housing-  
Industrial Maritime Environmental Impact Statement Fiorito Property

*Sent via email to PCD\_Industry\_And\_Maritime\_Strategy@Seattle.gov*

## I. INTRODUCTION

My name is Dan Fiorito. I represent the interests of my father Dan Fiorito, Jr. and my uncle Tim Fiorito. They are the owners of six contiguous parcels of land (198220-1700, 1640, 1650, 1665, 1685, 1690) in East Ballard consisting of 100,896 square feet of land (collectively “Fiorito Parcel”) that is zoned IB-45. The land is roughly one square block. Their family has owned the property for over 80 years. **This correspondence supplements the Fiorito’s original comments on the Industrial Maritime Environmental Impact Statement.**

In May of 2016, the Fiorito’s submitted a Comprehensive Plan Amendment Application to remove their six parcels from the BNMIC Boundary. The Fiorito’s proposed that the Future Land Use Map be amended and that their block be rezoned from Industrial to Mixed Use. The application is still pending as the Seattle Planning Commission has repeatedly indicated the proposal would be better addressed by the Industrial Lands Task Force. However, the Task Force has failed to address their request to date. Consistent with the draft EIS, Seattle is ready for new thoughtful zoning in its industrial buffer areas and must move forward with amending the comprehensive map.

The Fiorito’s fully support legislation for the **Urban Industrial Land Use (UILU)** concept discussed in the Maritime Industrial and Maritime Strategy Report. This zoning is designed to foster increased employment and entrepreneurship opportunities with a vibrant mix of affordable, small-scale spaces for light industry, makers, and creative arts. The benefit is the creation of more integrated and healthier transitions at the edges between industrial areas and neighboring urban villages, residential, and mixed-use areas. Consistent with the UILU, the Fiorito’s propose a new vision for Seattle’s light industrial lands in the buffer areas that will permit traditional light industrial uses while also providing housing for its workforce. Such development will foster a diverse community accessible via the many surrounding transit routes.

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The Fiorito Parcel is an excellent location to support Seattle's desperate need for artisan maker space and work force housing while enhancing the natural environmental attributes of the area. Amending the comprehensive map and including zoning regulations allowing for the Urban Industrial Land Use concept will open doors for landowners to explore new ideas that will foster workforce development, workforce housing, and new spaces for artisan workers.

It is important to understand that industrial buffer areas are completely different in appearance, form, and function from purely industrial areas. For example, the Fiorito parcel is immediately adjacent to a single-family neighborhood and is within walking distance of the Ballard Hub Urban Village. The neighborhood consists of multiple breweries, restaurants and light industrial businesses. It is not connected to a waterway and there is no heavy industry in the area. The area is primed for fresh development ideas beyond mini-storages and pure industrial uses. Heavy manufacturing does not occur in these areas and no industrial jobs will be lost if housing and maker space development is allowed. To the contrary, jobs will be gained as will housing for the new workforce.

The Fiorito's have contemplated an urban hub where light industrial business, artisan makers, and maritime / industrial workforce residents could all co-exist in the same development along with spaces that could be used for community gatherings. The Fiorito's have included some renderings of development ideas with this submission. Now that the City is reviewing land use and modernizing the code to reflect the needs of its people, it must understand that light industrial areas can serve as transitions between purely industrial areas and purely residential areas that include both workforce housing and light industrial and artisan maker spaces.

New UILU zoning will foster development ideas that are focused on environmental and economic justice. For example, the work in the neighborhood where you live possibility can fully be implemented to cut down commuter trips while also allowing residents to develop a community and neighborhood. If one were to drive through the industrial buffer area where the Fiorito parcel is located at night, they would find empty streets and closed businesses. In recent years with the unfortunate explosion of homeless camps, this has been an open invitation for drug trafficking, prostitution, theft, and a general lack of law-abiding behavior.

Take for example the Leary Triangle which is kitty corner from the Fiorito parcel. The City has left that area unattended and a drug camp has been allowed to prosper there for years. There have been multiple RV fires, violent fights, incidents of illegal dumping, and loud noise on this median. As business owners, the Fiorito's have had to invest in additional security measures to mitigate against the crime caused by the element associated with the Leary Triangle. Regardless, they have been continually victimized by the crime. They need relief. Zoning changes will help in that regard.

UILU zoning will help the Fiorito's and similarly situated landowners maximize the utility of the land by making it functional for the community. Likewise, Seattle will be able to get much needed workforce housing and to incentivize smart development that will make the area safe for all its residents. Rethinking areas like the Leary Triangle in industrial buffer areas so that all the residents can enjoy them will make the city more livable. With people residing in workforce housing in the industrial buffer areas, crime will not be allowed to proliferate

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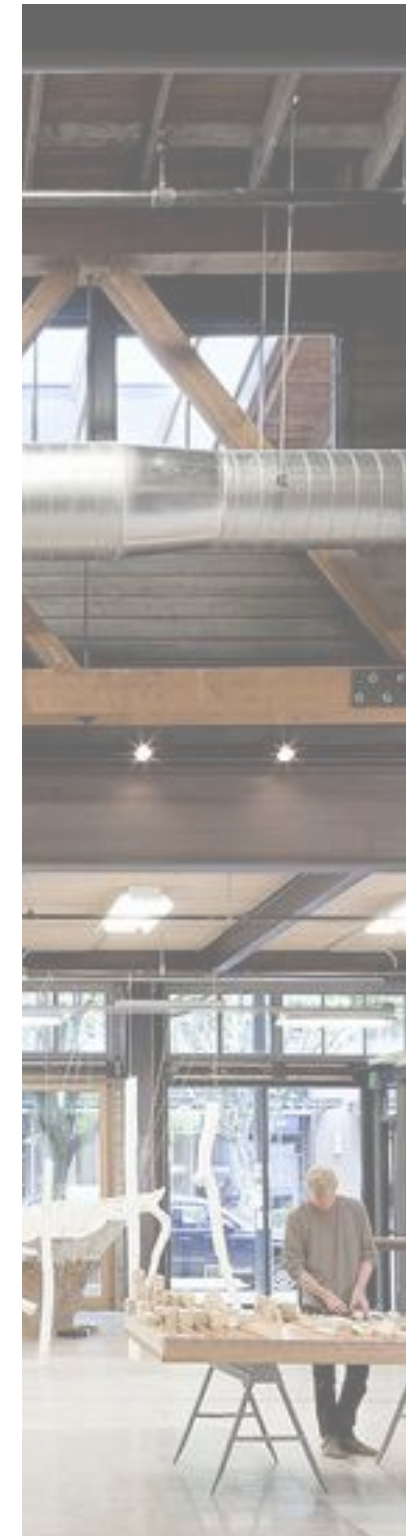
unchecked. The residential presence will transform the neighborhood and in turn improve the quality of both the surrounding industrial and single-family housing neighborhoods.

This is an exciting time. Seattle has an opportunity to reimagine light industrial areas to better serve its residents. The EIS demonstrates that any minimal adverse impacts tied to UILU zoning are mitigated by the benefits such zoning would bring. Now is the time to cross the finish line and to make UILU zoning a reality. The Fiorito Parcel is perfectly situated for UILU zoning. Combining high paying artisan jobs and maker space with workforce housing all in one neighborhood community epicenter makes sense. Reducing commuter trips and thus carbon emissions make sense. Giving industrial and maritime workers access to affordable housing near their jobs makes sense. Allowing families near industrial buffer areas access to services and amenities that improve the quality of in city living while also creating a neighborhood to buffer heavier industrial uses from residential uses makes sense. Consequently, the Fiorito's enthusiastically support UILU zoning.

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cont.

Sincerely,

Dan Fiorito



## **Ballard Urban Maker Hub**

Research and Analysis of Industrial Buffer (IB)  
Zone for New Development Proposal

BINMIC (Ballard-Interbay Manufacturing/Industrial Center)

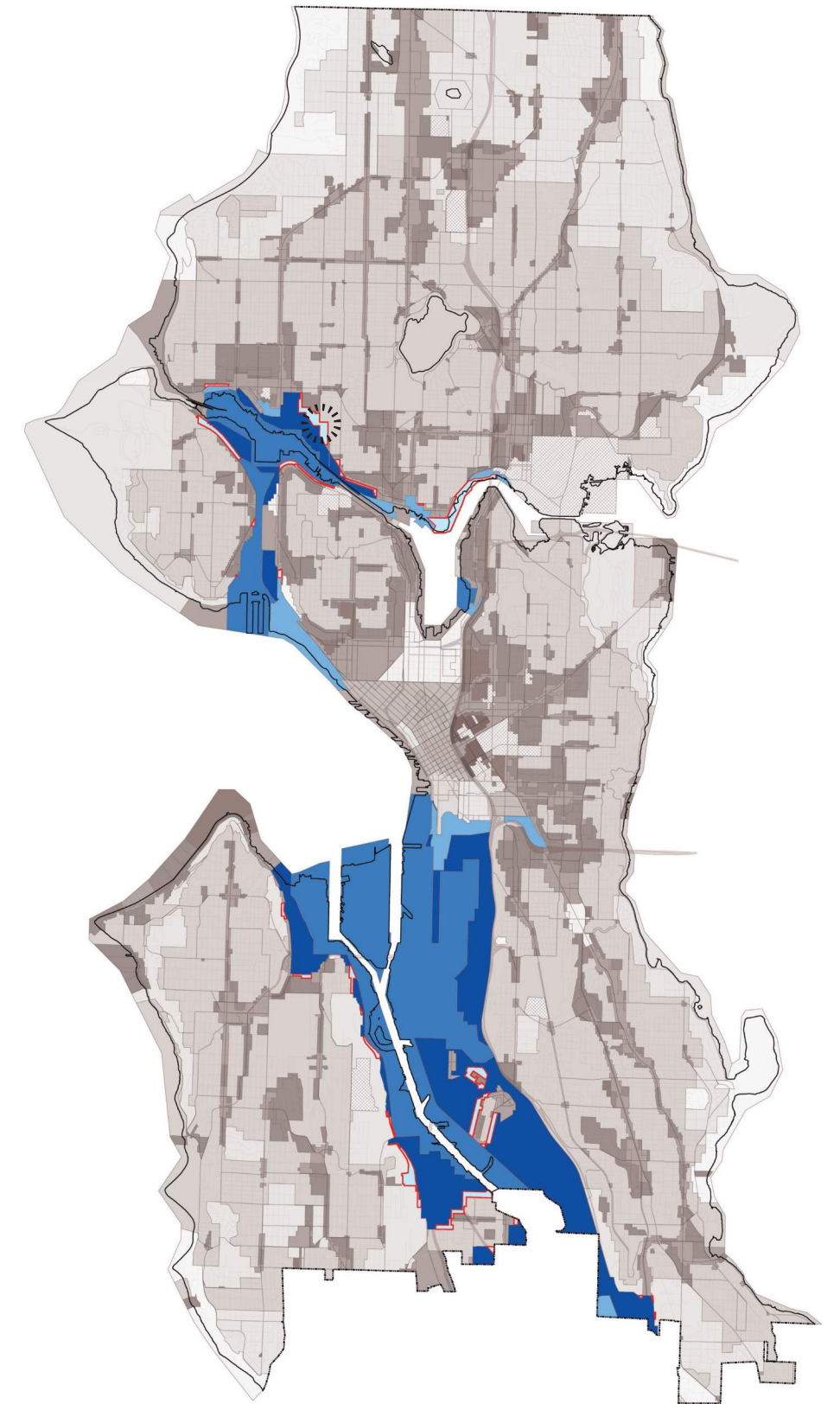
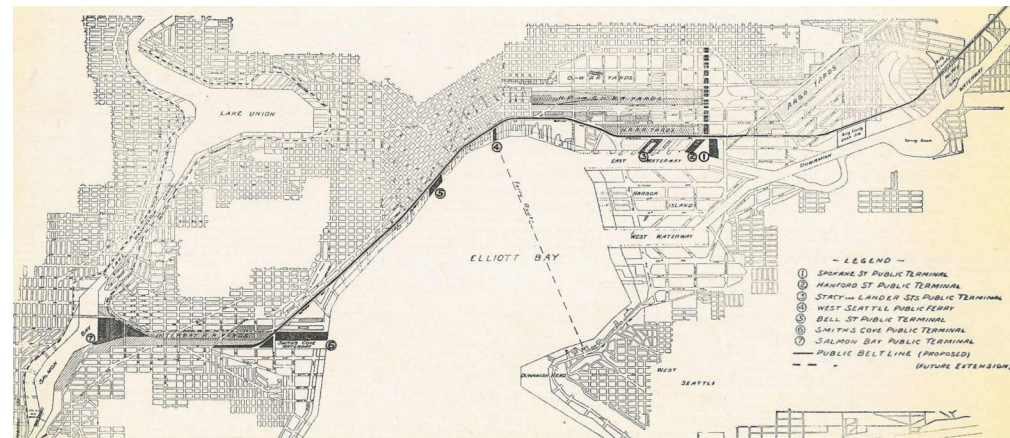
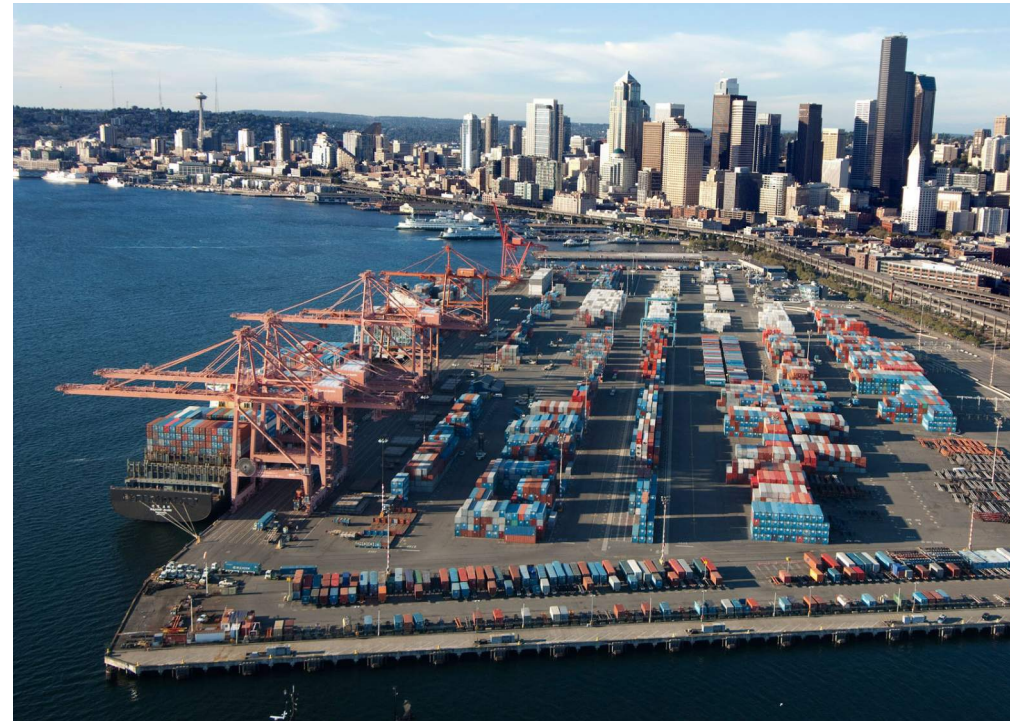
Site Information

Zone: IB U/45  
 Adjacent Zones: IG U/65, LR1, SF 5000

Zoning Summary

The project site is located at the intersection of several land use zones. The site is located in an overlay district known as the Ballard Interbay Northend Manufacturing Industrial Center (BINMIC) and the Ballard Hub Urban Village is located to the North-West.

Seattle's industrial lands are primarily located South of Downtown adjacent to the Port of Seattle. Another area of industrial lands is located at Interbay and parts of Ballard at the waterfront in particular. The industrial zones are shown in blue in the map diagram to the right. The industrial buffer zones - IB - have been outlined in red (very small slivers of property compared to the IG zones).



^ Seattle's Industrial Lands, IB zones outlined in RED

- COMMERCIAL - C
- INDUSTRIAL GENERAL - IG
- INDUSTRIAL BUFFER - IB
- SINGLE FAMILY RESIDENTIAL - SF
- LOWRISE - LR
- NEIGHBORHOOD COMMERCIAL - NC

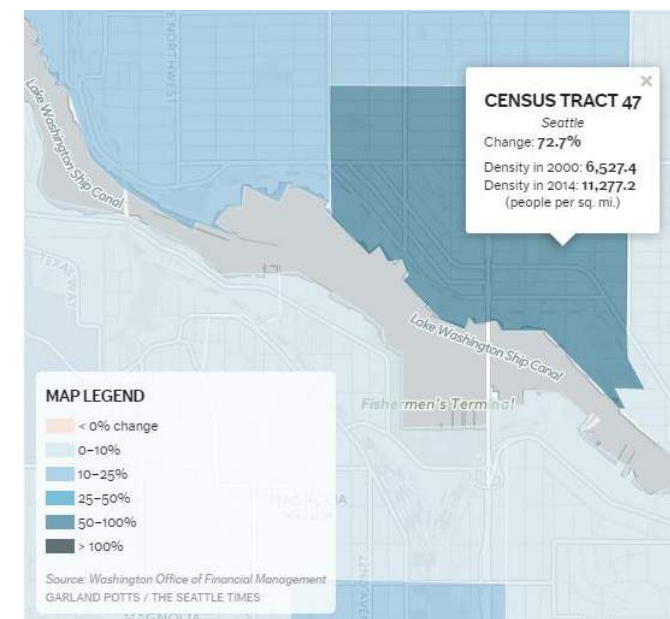
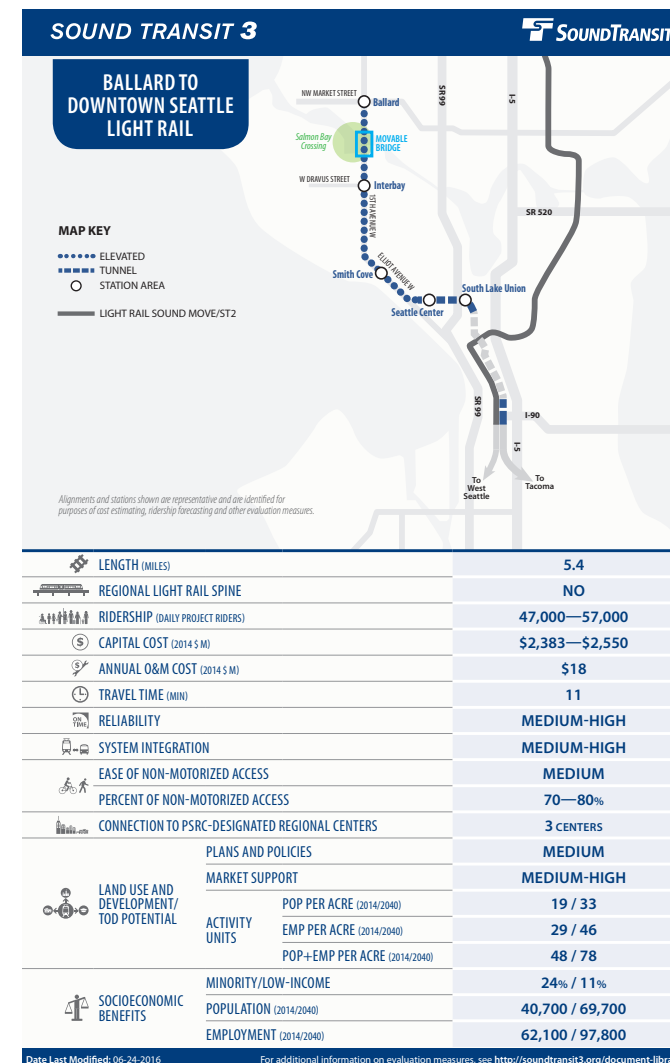
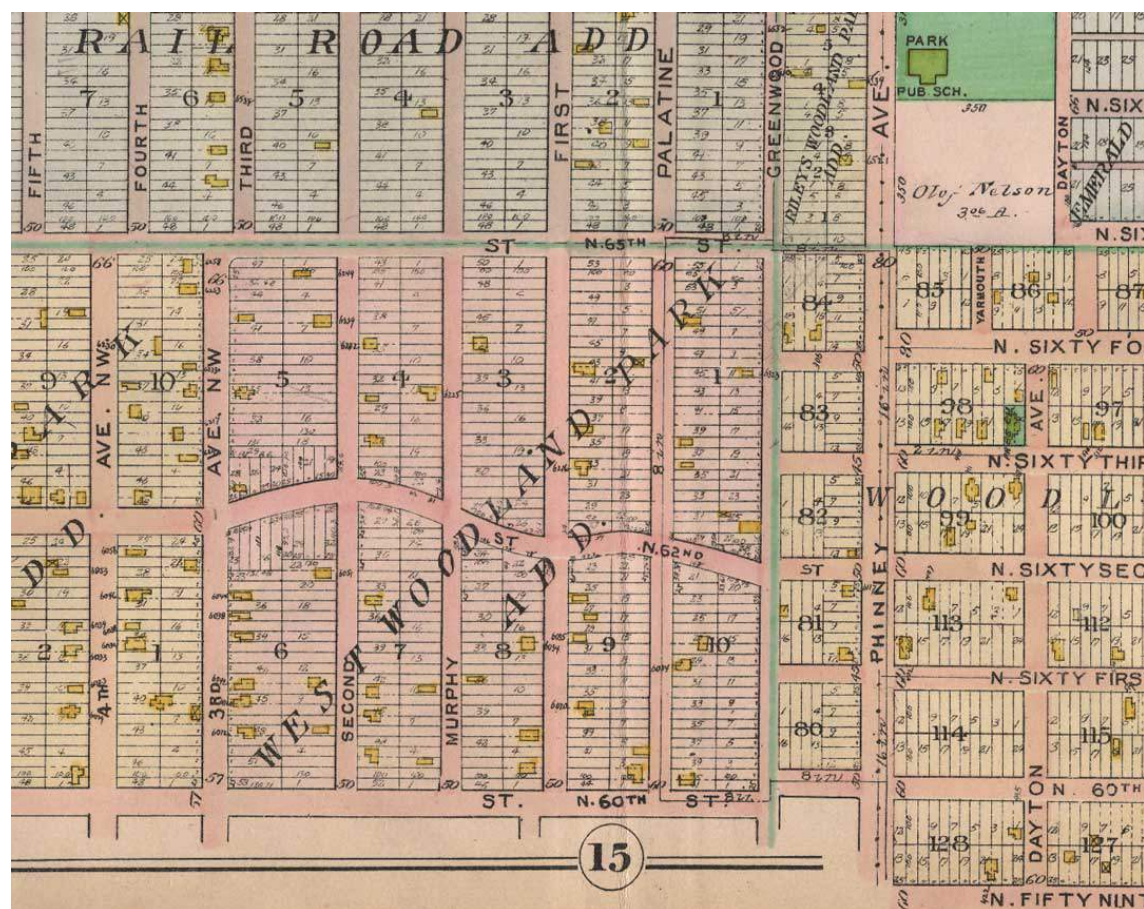










### West Woodland

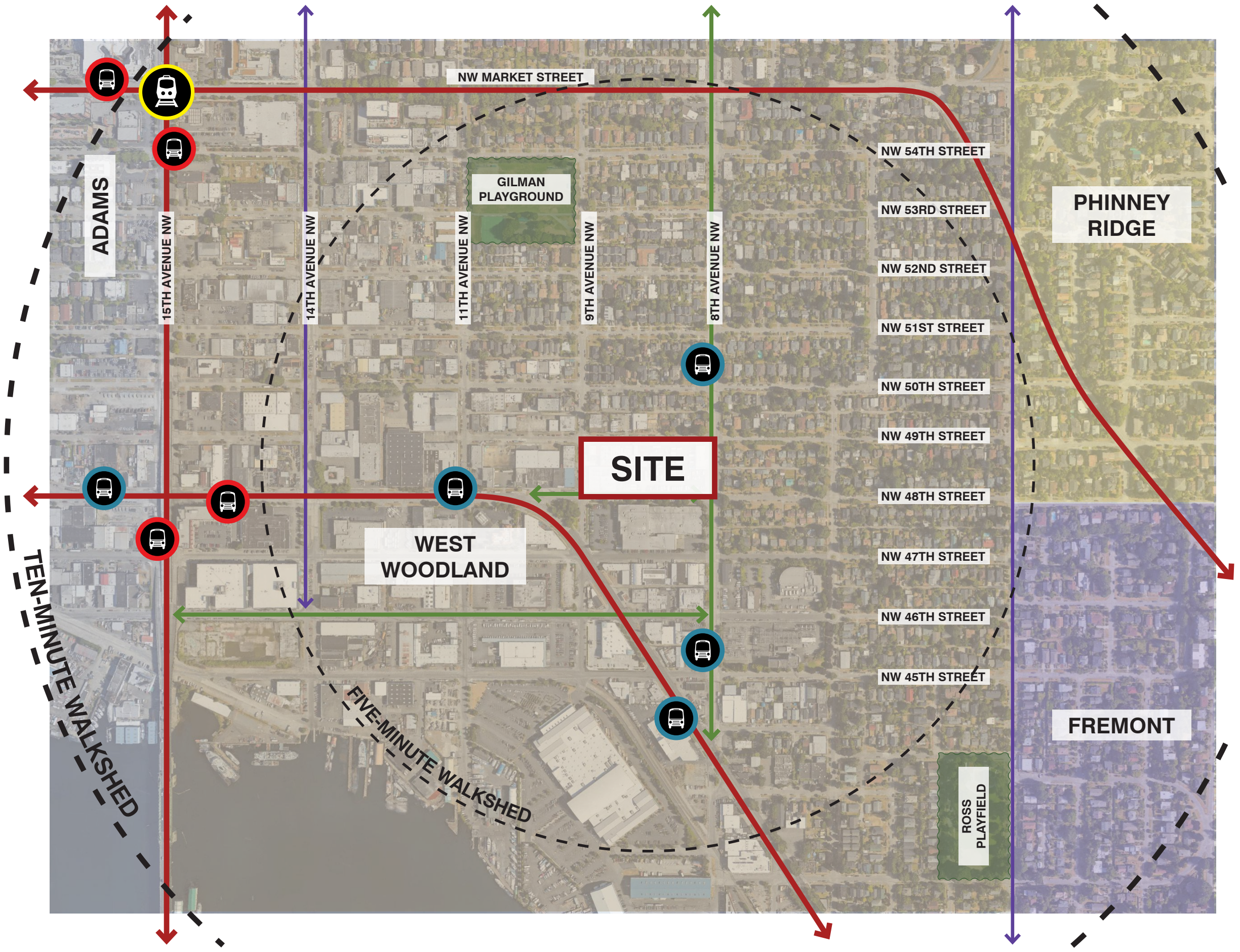
Ballard is the general neighborhood location of the project analysis but more specifically West Woodland. The site is relatively flat with grade sloping slightly from East down to the West. The site is located just outside a frequent transit area that is to the North and West. West Woodland is a primarily residential neighborhood but there are several restaurants, coffee, music and shops are all within walking distance. There are several bus lines and the RapidRide D Line that currently provides easy access to Downtown Seattle.

### Sound Transit 3

In the fall of 2016 voters approved the Sound Transit 3 regional light-rail expansion plan. One new line will provide service to the Ballard area with a stop location planned at the intersection of 15th Avenue NW and NW Market Street. This location would be 5 minute walk from the project site. An excerpt from the ST3 plan document is shown at right along with an image from the Census Bureau indicating the significant recent growth in population in this area.



-  PRINCIPAL ARTERIAL
-  MINOR ARTERIAL
-  COLLECTOR ARTERIAL
-  TEN-MINUTE WALKSHED
-  FIVE-MINUTE WALKSHED
-  BUS STOP
-  BUS STOP - RAPIDRIDE TO DOWNTOWN
-  LIGHT-RAIL STOP (FUTURE)



**1969**



**1980**



**1990**



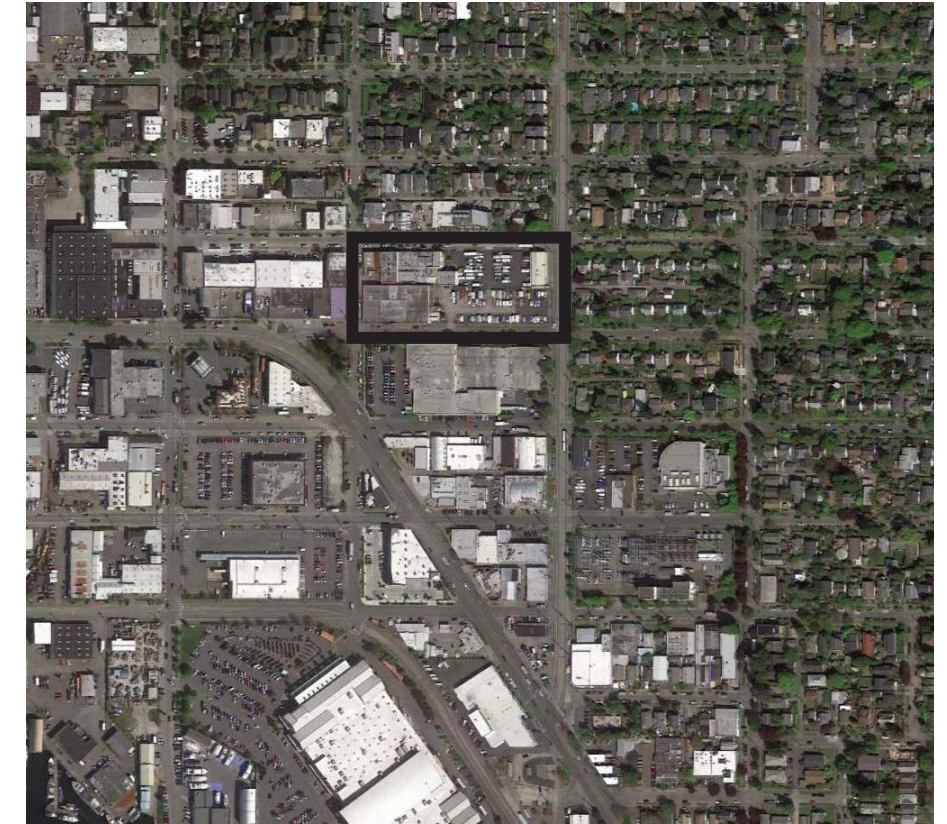
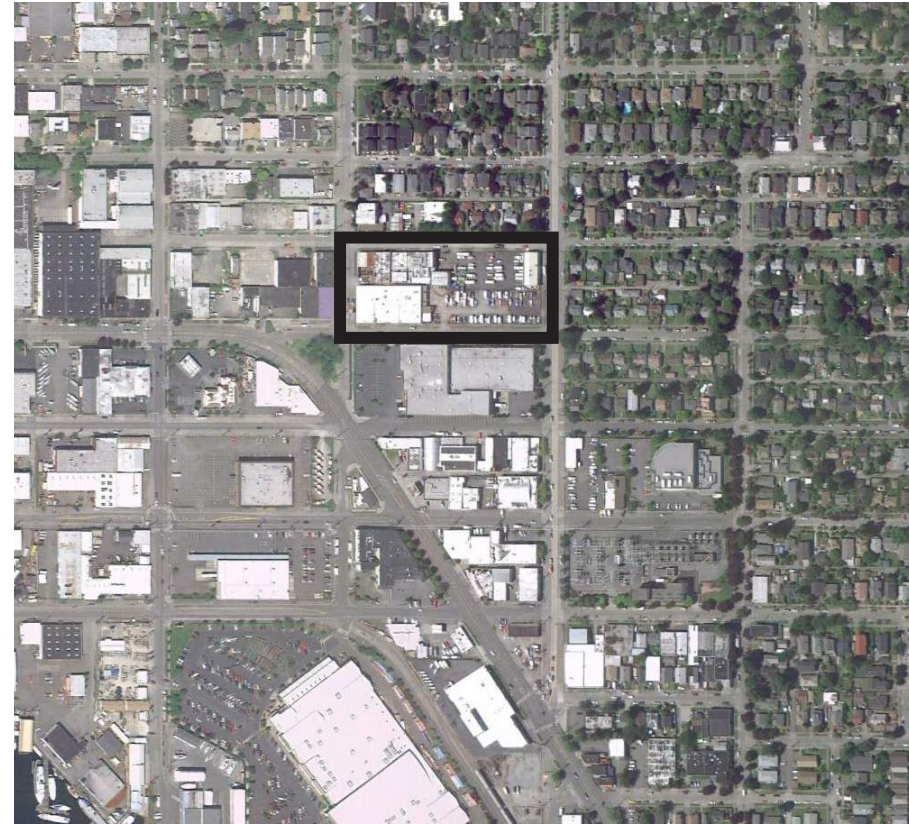
At this time much of the area around the project site is either vacant property or residential homes.



**2002**

**2010**

**2015**



When the Fred Meyer grocery store was built it was one of the most significant new developments in the area.

Even with the significant real-estate market growth, the project site has remained underutilized.

### Philadelphia's Industrial Rezoning Proposal

#### Executive Summary:

“Philadelphia’s long-term economic health depends in part on its ability to attract, accommodate, and retain industry as part of a balanced and diversified economy. Today, production, distribution, repair, and other industrial activities continue to be critical components of the City’s economic base, accounting for over 100,000 jobs citywide and more than \$322 million annually in direct tax revenue to the City’s coffers.

The long term viability of industry in the City is dependent on the availability of sites and conditions that will encourage investment and allow industry to operate efficiently and profitably. Today, Philadelphia’s inventory of marketable sites is both limited and constrained. Large tracts of industrial land have been rezoned and zoning variances have been granted in response to residential and commercial market pressure. With increased demand from non-industrial uses, building and land prices have increased, often pricing out industries that cannot afford to match the prices paid by residential or retail developers. At the same time, seismic shifts in the demand for industrial real estate have occurred over the past few decades; investors and users are driven to larger parcel sizes and flexible, newer one-story buildings, while smaller multi-floor, loft structures have become largely obsolete.

In light of recent efforts to update both the City’s zoning code and comprehensive plan, constraints in the supply of Philadelphia’s industrial land, changes in demand for industrial space and increasing pressure on industrially-zoned land from other uses represent a clear opportunity to provide policy direction for industrial land use in Philadelphia. To this end, the Philadelphia Industrial Development Corporation, with the support of the Philadelphia Department of Commerce and the Philadelphia City Planning Commission, has sponsored this study with the goals of expanding and retaining industry in the City, protecting the employment opportunities and tax revenues generated by the sector, and rationalizing the City’s supply of industrially-zoned land to meet the projected needs of Philadelphia businesses.”



# RECOMMENDED ZONING TYPOLOGIES

## UTILITIES AND TRANSPORTATION

A significant percentage of the City's industrial land is occupied by critical, typically publicly-owned infrastructural assets. 3,500 acres – nearly 4.5% of the city – are occupied by ports, airports, rail yards, power generation and transfer facilities or water filtration and sewage treatment facilities. Since the form of these facilities generally follows their function, as do impacts such as noise, traffic, odor, and activity, the character of these parcels vary widely. Treating them separately from a zoning perspective would “free up” traditional zoning categories to more directly enhance the marketability, functionality, attractiveness, and compatibility of productive industrial sites. This could enhance job retention and growth citywide by more functionally linking the city's economic development and land use policies. In addition, as most of these utility and transportation assets anchor many of the city's industrial districts, a separate zoning category could help to soften the interface of industrial areas with non-industrial uses.

### REPRESENTATIVE SITES INCLUDE:

- > Philadelphia International and Northeast Philadelphia Airports
- > Tioga Ave and Packer Ave Marine Terminals
- > Southeast and Southwest Pollution Control Plants
- > Torresdale Pumping Station
- > Queen Lane Reservoir and Water Filtration Plant
- > Tristate / CSX South Philadelphia Intermodal Yard

**USES:**  
Power generation, water, waste treatment; rail yards, ports, airports

**CHARACTER:**  
VARIES.  
Form follows function

**IMPACTS:**  
Fixed impacts – includes odor, traffic, noise, high activity

## HEAVY INDUSTRIAL

The character and impacts of heavy industrial areas are not compatible with residential land uses and, as such, this zone incorporates areas well-buffered or isolated from neighborhoods and most commercial uses. Low building coverages – often lacking enclosed activity altogether – slack space, storage tanks, pipelines, garages and yards would be typical forms found in this zone. An attractive operating environment is less important to users in this classification and design standards should be limited. The zone should be permissive of high impacts such as noise, vibration, odor, traffic and activity in order to provide for functional and secure space in the city required by petrochemical tank farms, refineries, gasification plants, asphalt and concrete plants. Additional areas for community-serving heavy industrial activities – including scrap yards, salvage yards, recycling, waste transfer and heavy equipment maintenance or repair – may be designated within existing industrial districts via a community planning process where necessary.

### REPRESENTATIVE SITES INCLUDE:

- > Sunoco Philadelphia Refinery complex in Grays Ferry
- > PGW's Passyunk re-gasification plant in Grays Ferry
- > Kinder Morgan and PGW tank farms in Lower North Delaware
- > Riverside Materials asphalt plant in Lower North Delaware

**USES:**  
Least restrictive - refineries, petroleum tanks & terminals

**CHARACTER:**  
LOW FAR.  
Tanks, pipelines, secure areas

**IMPACTS:**  
Most permissive - high noise, odor, vibration, traffic

## MEDIUM INDUSTRIAL

The medium industrial classification incorporates the bulk of the city's non-infrastructure industrial lands. The impact of the activities located here are less noxious than those found in heavy industrial areas, and many general industrial zones already abut residential neighborhoods. Higher building coverages, large lots and building footprints and truck circulation areas are found in this zone, which generally comprises the most appropriate territory for retention and growth of modern industrial facilities. Urban design standards, infrastructure improvements, and other upgrades should be made to achieve the quality business environment required to make these sites more competitive and marketable. Manufacturing, processing, wholesale and distribution uses with moderate noise, vibration, odor and traffic impacts would be typical in this zone.

### REPRESENTATIVE SITES INCLUDE:

- > Hunting Park East manufacturing and distribution core
- > Eastwick A industrial park in Southwest
- > Byberry industrial park in Northeast
- > Food Distribution Center in South Delaware

**USES:**  
Manufacturing, distribution, processing, industrial park

**CHARACTER:**  
MID FAR.  
Mid to large footprint, well-buffered

**IMPACTS:**  
Permissive – noise, vibration, odor, hours, traffic

## LIGHT INDUSTRIAL

The light industrial classification is intended to accommodate modern business and technology parks, advanced manufacturing, and research and development facilities on high-value urban land in an attractive, low-impact environment. Design guidelines, performance standards, and a percentage of by-right office uses would provide for an environment competitive with suburban business and technology parks, with the added advantage of proximity to educational and health assets located in the city. Low-impact light industrial users – fabricators, wholesalers, and small distributors would also be typical in this zone, as would higher building coverages, urban street patterns and small or subdivided lots.

### REPRESENTATIVE SITES INCLUDE:

- > Navy Yard research and development park east of Broad Street;
- > Former Budd Complex and adjacent properties in Hunting Park West;

**USES:**  
Light manufacturing, assembly, artisanal fabrication, office, R&D, small wholesale, local distribution

**CHARACTER:**  
MID FAR.  
Mid to large footprint, well-buffered

**IMPACTS:**  
Permissive – noise, vibration, odor, hours, traffic

## Proposed New Mixed-Use Zones

### INDUSTRIAL COMMERCIAL MIXED USE

This zone accommodates mixed-use corridors across the city consisting of commercially-driven, locally-serving light industrial and heavy commercial uses including food wholesaling, equipment fabrication and repair, and construction supply. Higher truck and forklift traffic, outdoor material yards and daylight hour activity distinguish these areas from more retail-oriented commercial corridors. As such, impacts are generally localized and the character is mixed. This zone should specifically promote the reuse of older industrial buildings and carefully manage any decline of industrial uses.

#### REPRESENTATIVE SITES INCLUDE:

- > Umbria Avenue construction supply corridor in Roxborough
- > Washington Avenue construction supply corridor in Grays Ferry
- > Center City-serving restaurant equipment fabrication and food wholesaling in Callowhill
- > Close-in food distribution uses within the American Street corridor

**USES:**  
Commercially-driven mix of locally-serving quasi-industrial (eg, food wholesale, local fabrication & repair, construction supply), and commercial

**CHARACTER:**  
VARIETY IN SCALE & USE.  
Typically smaller footprint, located along commercial corridors

**IMPACTS:**  
Localized noise, traffic, activity

### INDUSTRIAL RESIDENTIAL MIXED USE

This zone is intended to address the unique areas of Philadelphia that still bear the marks of the industrial revolution – multi-story factory buildings, workshops, and garages standing cheek-to-jowl with dense urban row housing. While many of the factories that utilized these older buildings have gone, the communities' long association with their industrial legacy is often commensurate with a desire for continued productive uses and employment within the old neighborhoods. The industrial residential mixed use zone would provide a framework for true live-work uses, artisanal and small manufacturing, fabrication, assembly, and workshop uses compatible with traditional neighborhood fabric. The scale of industrial use here would invariably be small, with high - often multistory - building coverages, and minimal impacts. New mixed use building types would be encouraged to set aside space for productive activities.

#### REPRESENTATIVE SITES INCLUDE:

- > Lower American Street neighborhood
- > Aramingo district close to the Frankford Creek
- > Allegheny West neighborhood

**USES:**  
Artisanal, creative, workshop, small mfg. & fabrication compatible w/ traditional neighborhoods - residential conversion limited

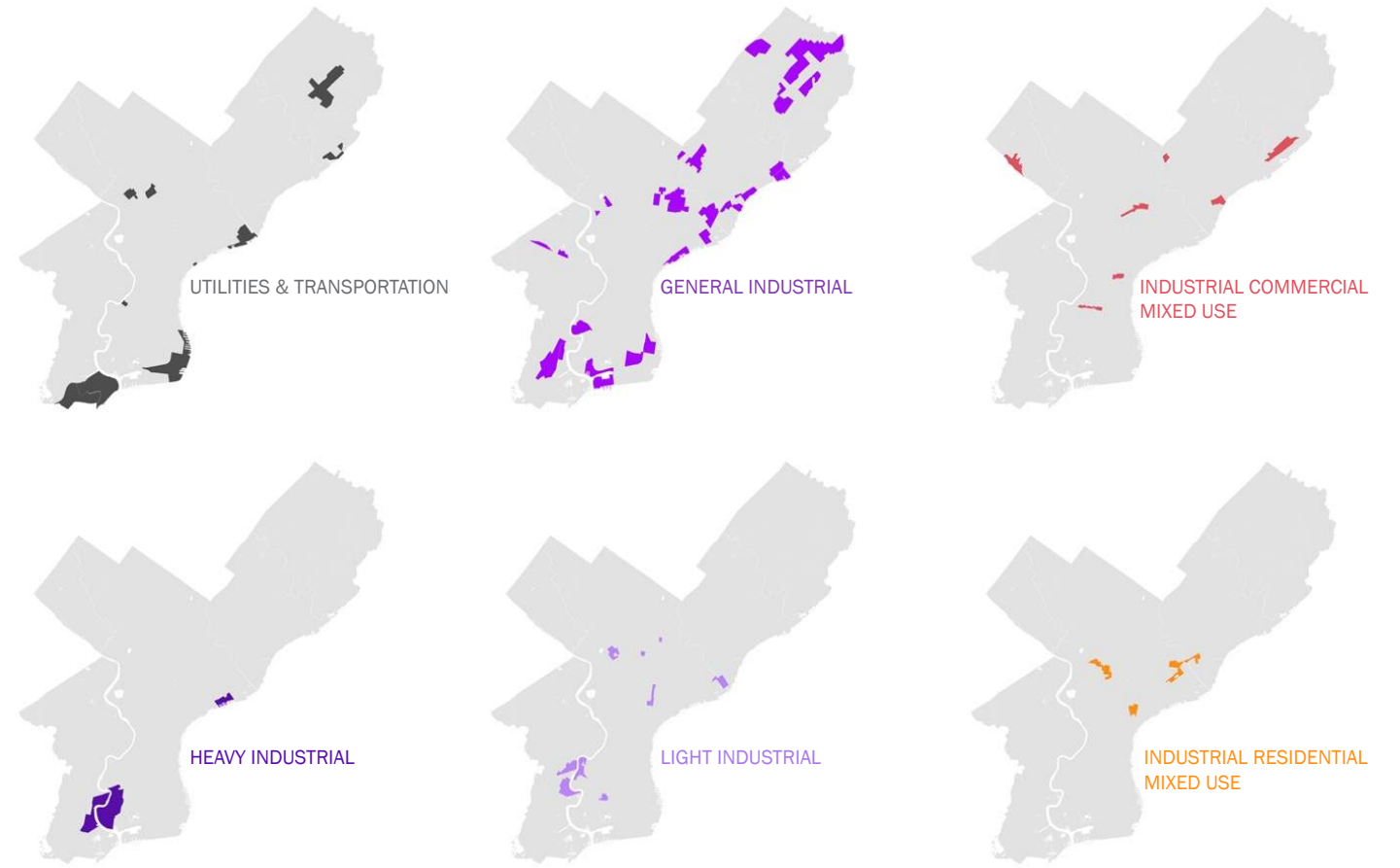
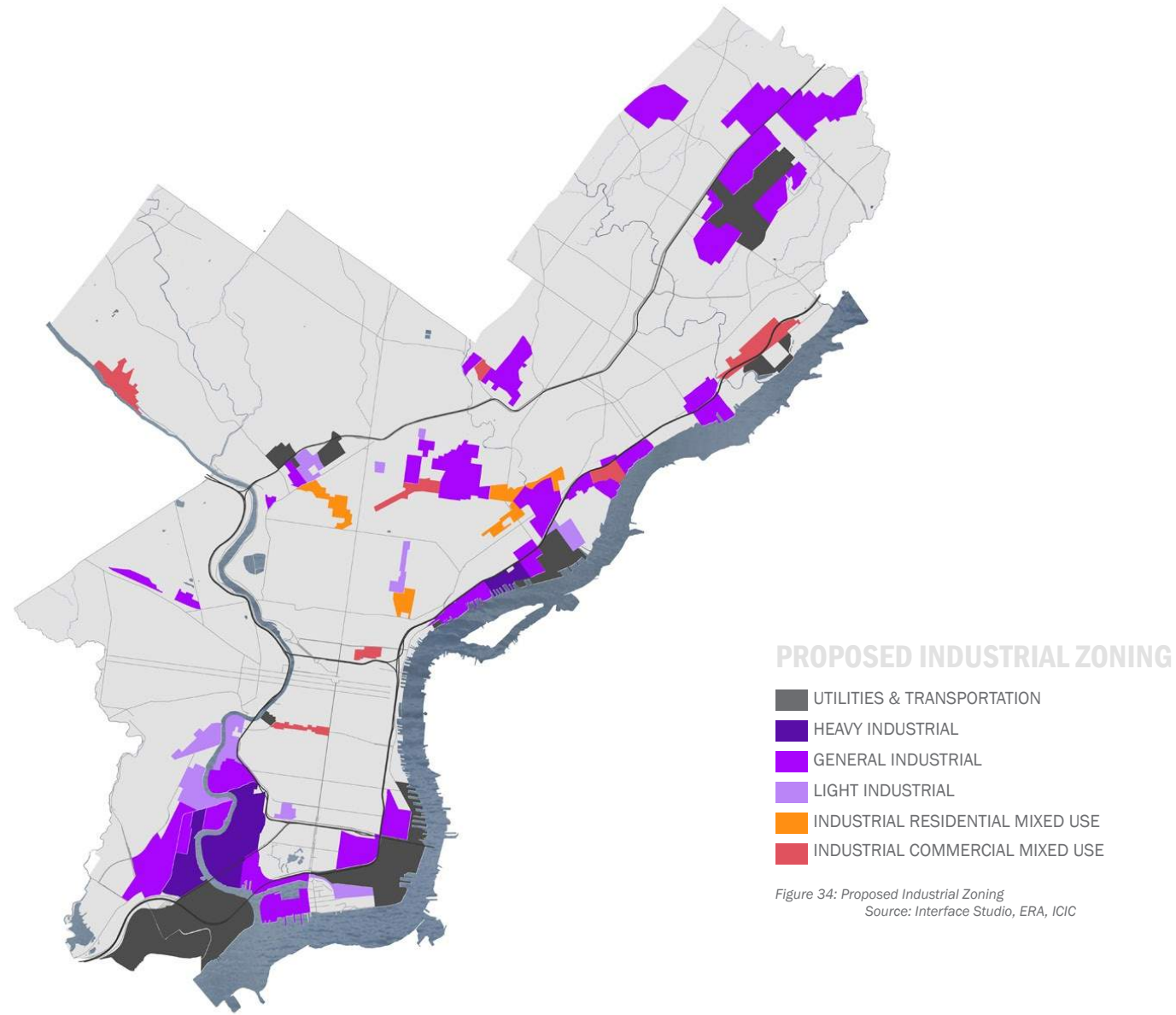
**CHARACTER:**  
SMALL SCALE.  
Flexible - often adaptive use of existing building stock, garage, workshop

**IMPACTS:**  
Minimal

The nine industrial zoning classifications in Philadelphia's current code should be collapsed into four classifications. The four classifications include a utilities and transportation infrastructure category that would separate public infrastructure from private industrial activity. The remaining three industrial zones classifications include heavy industrial, medium industrial, and light industrial. The intention is to segregate industrial uses with significant impacts on the surrounding environment (heavy industrial) as well as to create a tiered set of use and design regulations to improve the look and feel of industrial uses depending upon their proximity to surrounding communities.

In addition, two new mixed-use classifications are proposed, reflecting Philadelphia's fine-grained texture and recognizing that, in many places, low-impact industrial uses currently intermingle with commercial and residential uses. Additionally, these classifications would allow for a more rational and managed transition to new uses in older industrial areas while protecting the viability of established industrial businesses. Two industrial mixed-use zones are proposed – an Industrial-Commercial Mixed-Use (ICMU) zone and an Industrial Residential Mixed-Use (IRMU) zone.

Source: PIMLUS, Interface Studio, AECOM Economics



An initial zoning remapping is submitted based upon the following information:

- > The amount of land needed to meet the industrial potential outlined in the market analysis;
- > The market trends impacting industrial districts across the city;
- > Proximity to infrastructure that supports industrial retention and growth;
- > Proximity to residential communities; and
- > The existing intensity of industrial use.

The purpose of this map is simply to jump start discussions about zoning remapping. Re-mapping the city's industrial uses according to updated categories will be a difficult process that must be coordinated by the Philadelphia City Planning Commission and affected communities through a transparent planning process.

Source: PIMLUS, Interface Studio, AECOM Economics

**POSITIONING INDUSTRIAL LAND FOR INVESTMENT**

In addition to updated zoning classifications, industrially-zoned land should be managed with the application of three distinct but complementary industrial policy typologies – Industrial Protection Areas, Industrial Intensification Areas, and Transitioning Areas. These geographically-based typologies represent a set of policy interventions, including zoning. They are based on existing land use conditions and are intended to protect and grow the industrial job base within the city.

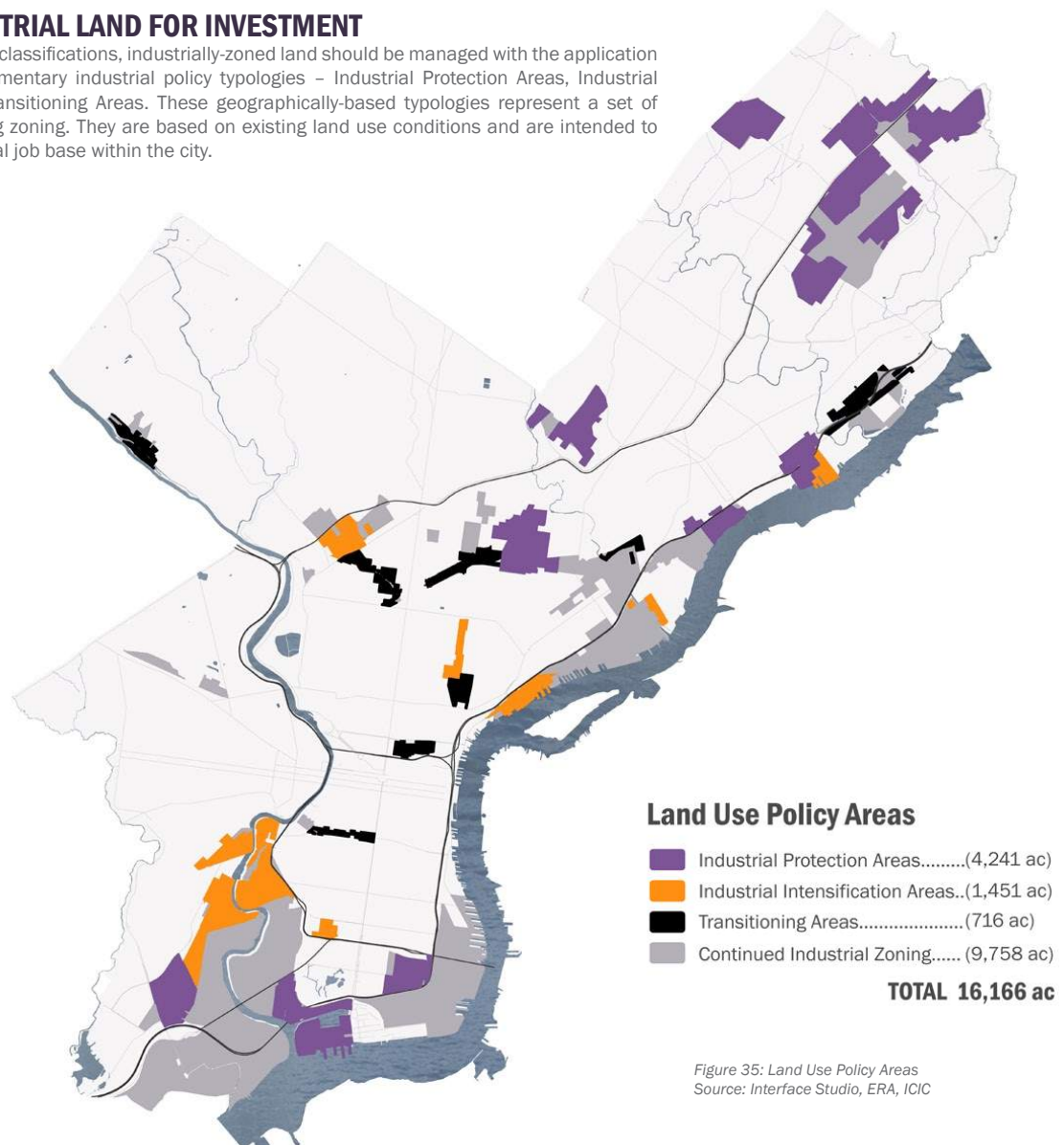


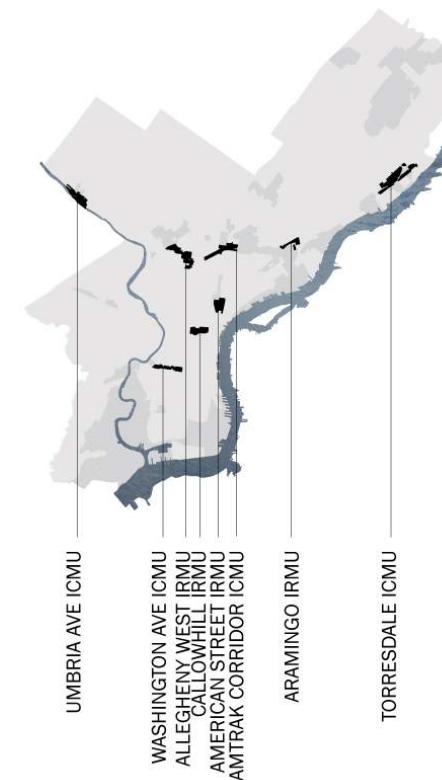
Figure 35: Land Use Policy Areas  
Source: Interface Studio, ERA, ICIC

**TRANSITIONING AREAS**

Some of Philadelphia’s industrially-zoned land is no longer suitable for intensive industrial use, with many facilities only marginally viable for modern industrial formats or viable for smaller, niche or artisanal industry. Such areas may lack the transportation infrastructure required by modern industry, site footprints may be too small, or they may be located within a dense urban fabric of residential neighborhoods. In many instances, industrial land within these areas faces market pressure from residential or commercial activity.

In such cases, transitions should be managed in an organized manner in order to support viable and appropriate industrial businesses within the area - including artisanal and craft activities that provide jobs and identity to a community without the high impacts. The pace and extent of transition should be guided by a master-planning process involving community stakeholders. As shown in Figure 3, the Transitioning Areas total 627 acres across the City and include areas proposed for industrial mixed-use zoning in urban industrial districts such as Callowhill, American Street and parts of Hunting Park West.

The Transitioning Areas should be encouraged to retain compatible industrial employment where possible, but underutilized and vacant parcels may be considered for redevelopment to alternative uses. It is recommended that for each Transitioning Area, the current building area utilized by industrial businesses be benchmarked as a starting point for calibrated retention over a predetermined period of time, perhaps even requiring replacement of lost industrial space with redevelopment. In addition, any rezoning from industrial to other uses should occur only in tandem with other policy interventions outlined herein aimed at ensuring a net gain in vital jobs-producing land in Philadelphia.



**TRANSITIONING AREAS & EMPLOYMENT DENSITY, 2009**

| TRANSITION NAME      | # PARCELS    | TOTAL ACREAGE | INDUSTRIAL EMPLOYMENT | EMPLOYMENT DENSITY (EMPL/ACRE) |
|----------------------|--------------|---------------|-----------------------|--------------------------------|
| ALLEGHENY WEST ICMU  | 479          | 121           | 280                   | 2.31                           |
| AMERICAN STREET IRMU | 1035         | 70            | 615                   | 8.82                           |
| ARAMINGO IRMU        | 172          | 39            | 287                   | 7.41                           |
| CALLOWHILL ICMU      | 247          | 65            | 656                   | 10.07                          |
| TORRESDALE ICMU      | 113          | 182           | 792                   | 4.35                           |
| UMBRIA ICMU          | 46           | 100           | 131                   | 1.31                           |
| WASHINGTON ICMU      | 500          | 50            | 468                   | 9.32                           |
| AMTRAK CORRIDOR ICMU | 401          | 89            | 577                   | 6.50                           |
| <b>Total</b>         | <b>2,993</b> | <b>716</b>    | <b>3,805</b>          | <b>(avg) 6.3</b>               |

Source: PIMLUS, Interface Studio, AECOM Economics

### Los Angeles' Industrial Rezoning Proposal & Case Study

#### Introduction:

"The City of Los Angeles has long recognized the need for a broader range of industrial zones that are responsive to the changing nature of work and people's desire to live and work in close proximity and often within the same space. In 2008, after several years of study, the Department of City Planning released a memorandum as part of the City's Industrial Land Use Policy project which underscored this need. It called for new zones that address the full range of industrial areas found in the City, including industrial mixed use districts—areas that retain a jobs focus but which may support limited residential uses. Finally, recent changes to Section 419 of the City's Building Code now make it more feasible to construct live/work units in new construction. The proposed zone is a new zoning tool that would permit new construction of live/work, mixed use projects in appropriate industrial areas as a means to implement City policies related to economic development, job retention, and housing production."

#### **Industrial Mixed-Use Policy Solutions**

The Los Angeles plan for rezoning industrial areas includes an FAR linkage for Live/Work units and space for "Arts & Productive Uses" to ensure that projects will provide an appropriate minimum ratio of light industrial space. Draft proposal language:

**"Floor area shall be reserved for Arts/Productive Uses at a ratio of at least 200 square feet per each Live/Work Unit"**

#### Conclusion:

"The proposed code amendment provides the City with a new mechanism to regulate development in a manner that is context-sensitive, requires public benefits in exchange for additional development rights, and helps to ensure a balance of uses appropriate for evolving, jobs-focused, industrial mixed use areas."

### HYBRID INDUSTRIAL LIVE/WORK (HI) ZONE

Quick Guide - June 10, 2015



^ Includes Proposal for Amendments to Los Angeles Municipal Code



^ Aerial photo of rezone area with case study project highlighted, from AMA package

DISTRICT ANALYSIS

The Arts District is a neighborhood in transition. Our intent is to maintain the industrial character that distinguishes the vernacular and culture of the district.



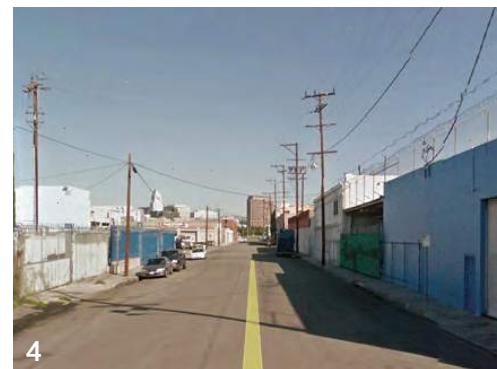
1 LIVE/WORK



2 URTH CAFFÈ

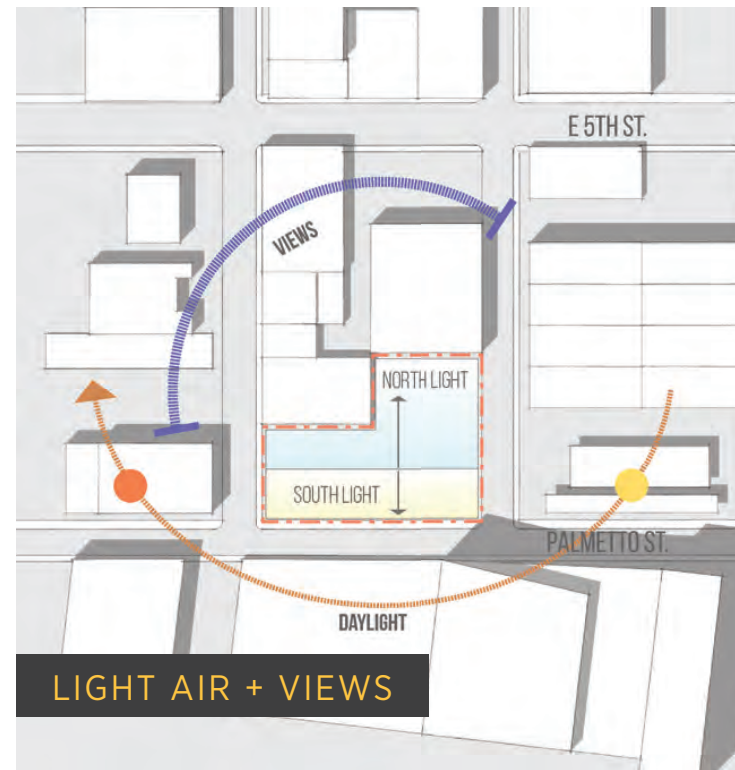


3 SCREENED UTILITY

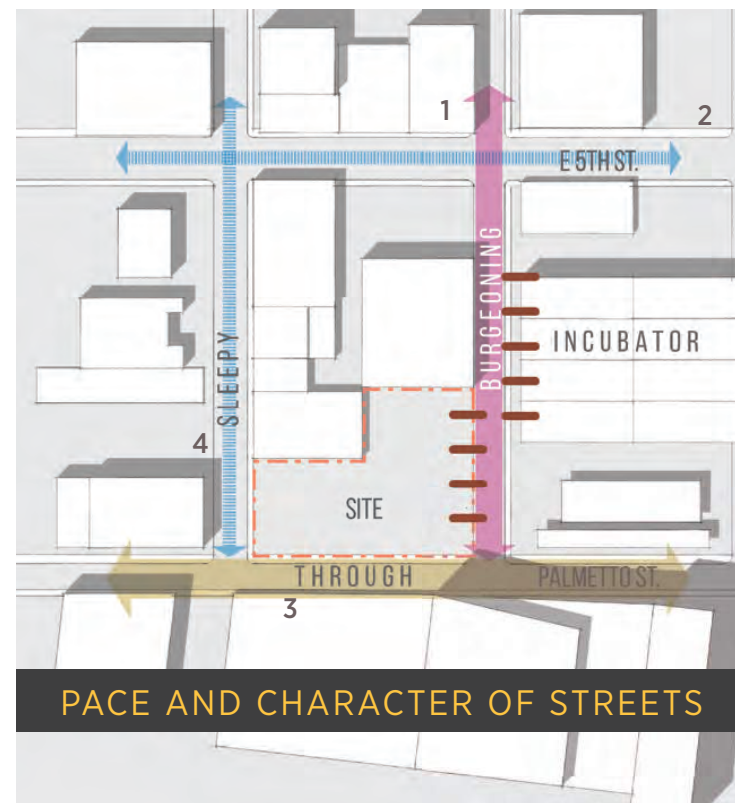


4 WEST EDGE

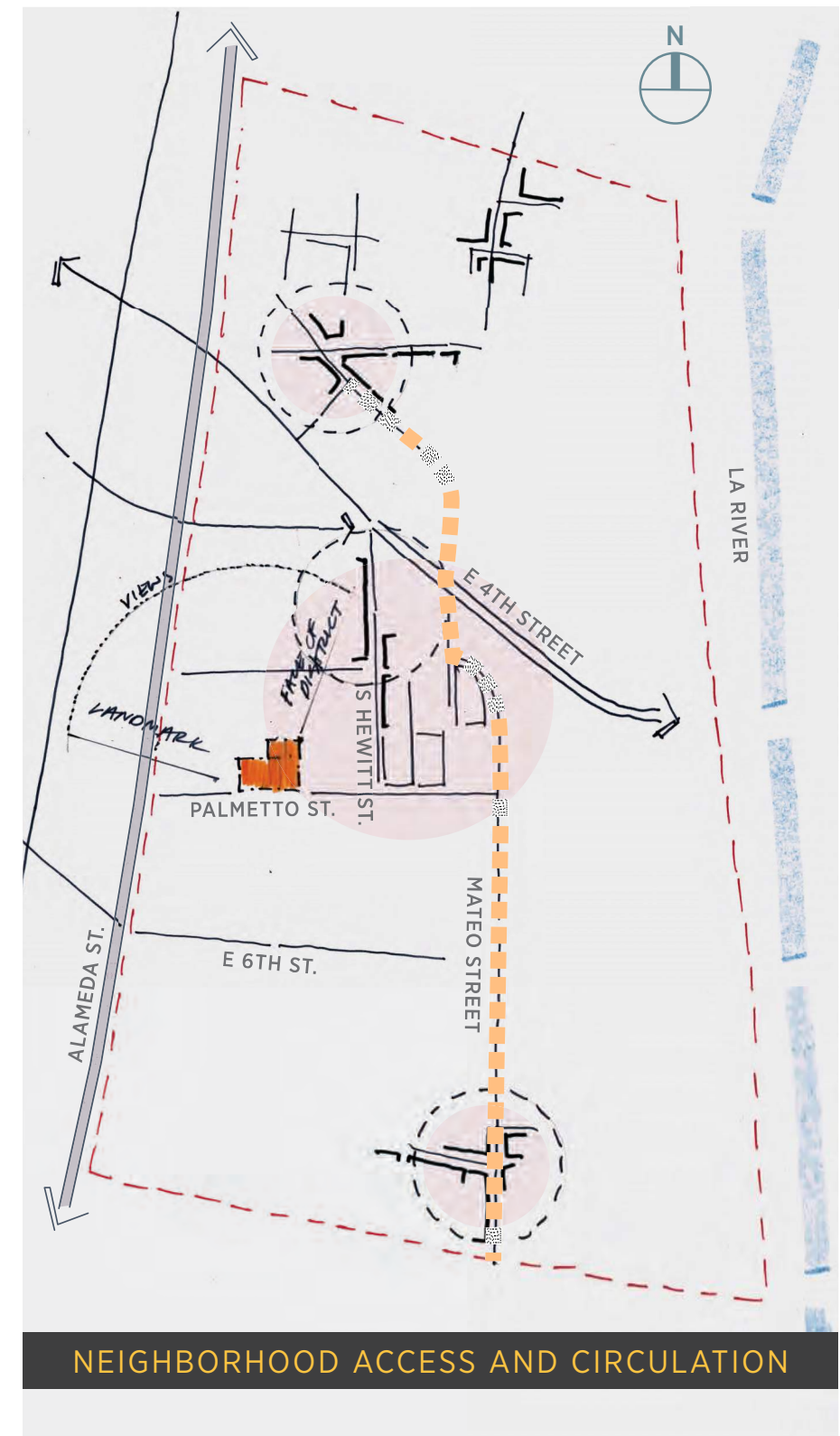
Source: Ankrom Moisan Architects & BOLOUR



LIGHT AIR + VIEWS



PACE AND CHARACTER OF STREETS



NEIGHBORHOOD ACCESS AND CIRCULATION

NEIGHBORHOOD MASSING



Source: Ankrom Moisan Architects & BOLOUR



AERIAL FROM SOUTHEAST

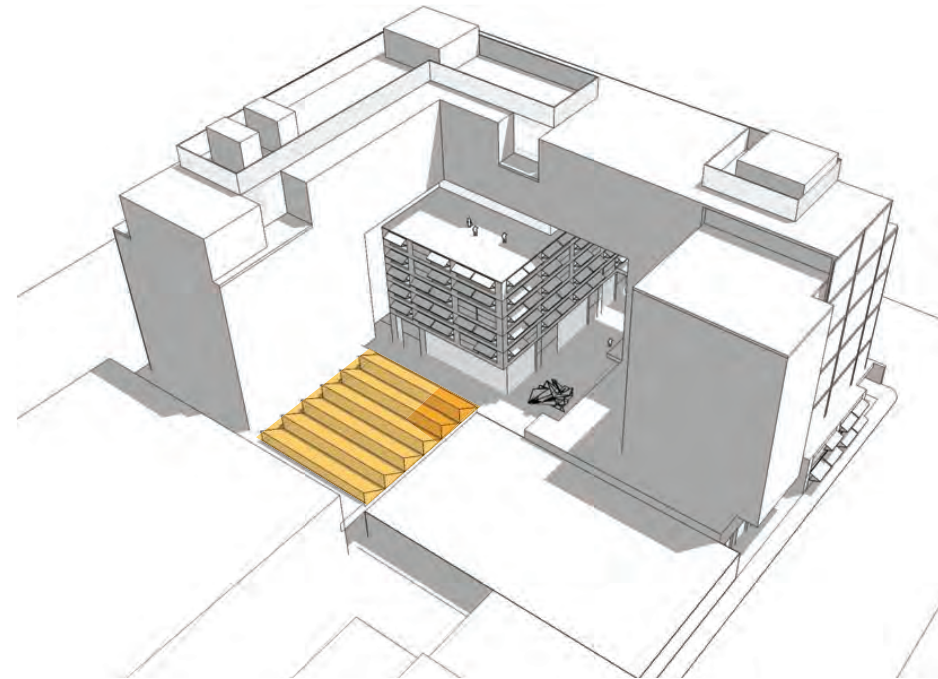


Source: Ankrom Moisan Architects & BOLOUR

PRODUCTIVE INTERIOR

PEDESTRIAN PLAZA + GALLERY  
CREATION AND CURATION SPACES  
ENGAGE AND SUPPORT THE  
NEIGHBORHOOD

- » The flexible community space could then be rearranged to suit the needs of those using it, for example, individual gallery stalls that take advantage of the even, north light.
- » Shared workspace on the ground floor accommodates residents and artists and makers from the district who require space and facilities that won't fit inside of their live/work units.

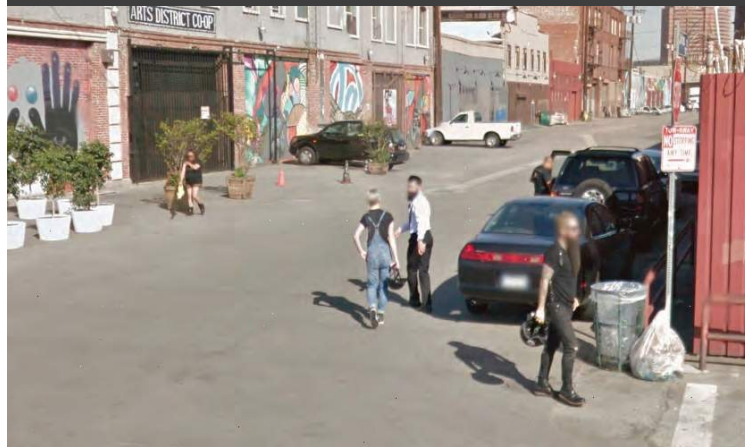


Source: Ankrom Moisan Architects & BOLOUR

**STREET EDGE**

**INDUSTRIAL AND PEDESTRIAN  
SAFE STREETS WITHOUT THE CURB**

**EXISTING PEDESTRIAN CONDITION**



**VERY FEW SIDEWALKS**

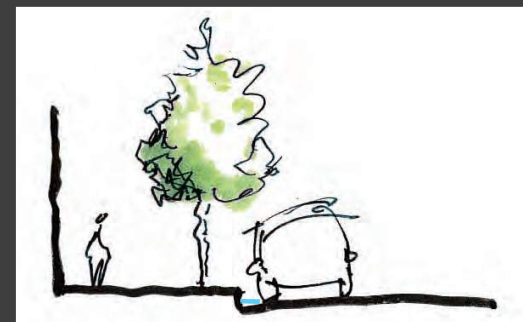
Pedestrians abound despite a patchy network of sidewalks in the district.



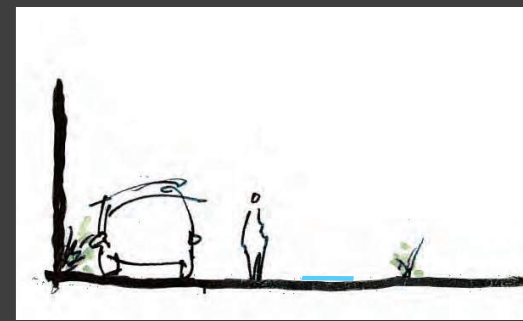
**GUERRILLA VEGETATION**

Though some streets offer typical street trees, the district features plants in irregular places.

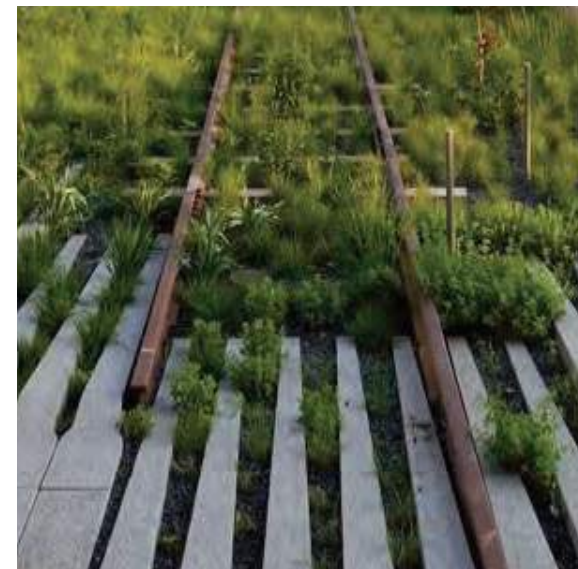
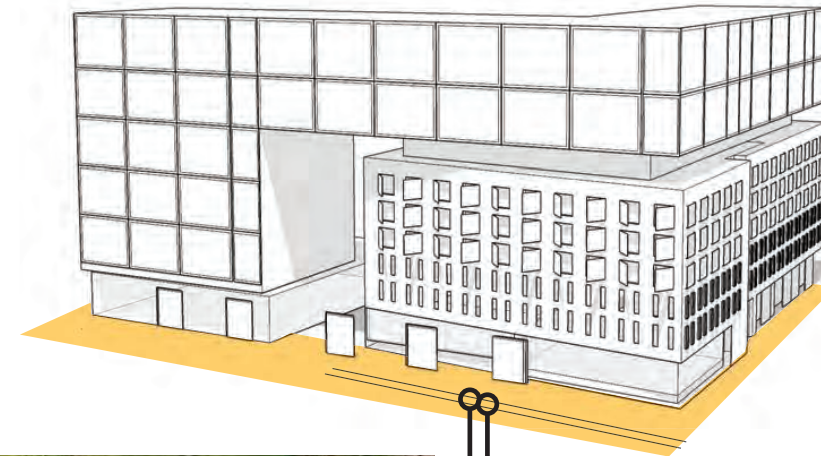
**TYPICAL STREET EDGE**



**INDUSTRIAL STREET**



**DESIRED STREET EDGE**



KEEP EXISTING RAIL TRACKS AND INTEGRATE INTO PLANTINGS



USE VEGETATION, STORMWATER INFRASTRUCTURE AND STREET AMENITIES TO SEPARATE PEDESTRIAN SPACE FROM AUTO SPACE



ALLOW HARDSCAPE TO DISINTEGRATE ALONG TRANSITIONS

Source: Ankrom Moisan Architects & BOLOUR



Traditional Industrial Uses

- Heavy Manufacturing
- Power Production
- Storage and Shipping

Current and New Industrial Uses

- Breweries and Distilleries
- Art Studios and Event Spaces
- Letterpress, Typesetting and Bookbinding
- Product Design Office and Manufacturing
- Co-Working Spaces and Makerspaces

3. EXAMPLE: CITY OF SEATTLE

MAPPING BREWERIES, DISTILLERIES, GROCERY

-  MICROBREWERY
-  LOCAL DISTILLERY
-  GROCERY STORE
-  TEN-MINUTE WALKSHED
-  FIVE-MINUTE WALKSHED

Proposed Grocer and 5-Story Mixed-Use Office and Retail Complex



Artist Studio, Jewelry Design, Product Design

Art production, lighting design and jewelry fabrication are great examples of light industrial uses that could be integrated in a mixed-use development project. This type of manufacturing is clean, quiet (mostly), provides retail opportunities and interesting storefront experiences.



^ MadArt located at 325 Westlake, supporting artists with studio space on the ground floor in South Lake Union. First artist-in-residence was John Grade, featured above.



^ (both) Graypants, diverse designs in lighting and products. Located in SODO.



^ (both) BALEEN, jewelry design and manufacturing shop located in Ballard.

Microbreweries, Distilleries

Seattle loves its microbreweries and distilleries. These locations are often available to host events as well.



^ Seapine Brewery and Taproom, a kid and pet-friendly microbrewery, located in SODO.



^ (both) OOLA, craft distillery, located in Capitol Hill. Also, an event space!

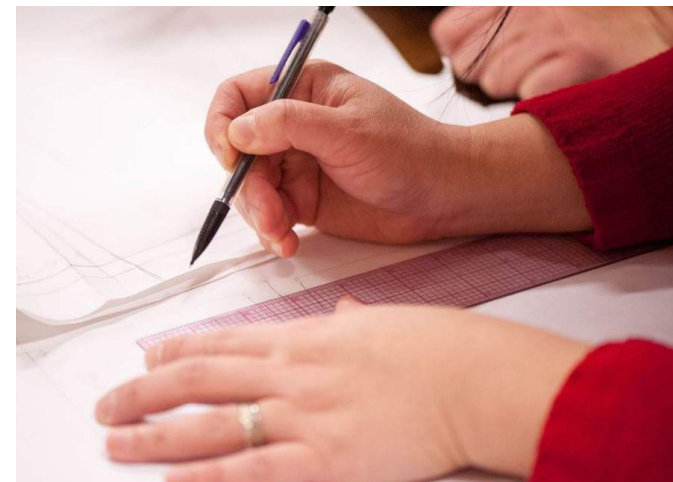


^ (both) STOUP, microbrewery located in West Woodland with an excellent patio area and great beers too.



Fashion Studio, Apparel and Accessories Manufacturing

Fashion design and manufacturing companies include Swift.Industries, Seattle Muses, Fioravanti, Filson, Alchemy Goods, Totokaelo, etc. They are located in neighborhoods across Seattle such as SODO, Capitol Hill and Beacon Hill.



^ Swift.Industries, started as two friends with a sewing machine, some chicken scratch sketches, and an insatiable obsession with bicycles. Making bicycle bags in SODO.

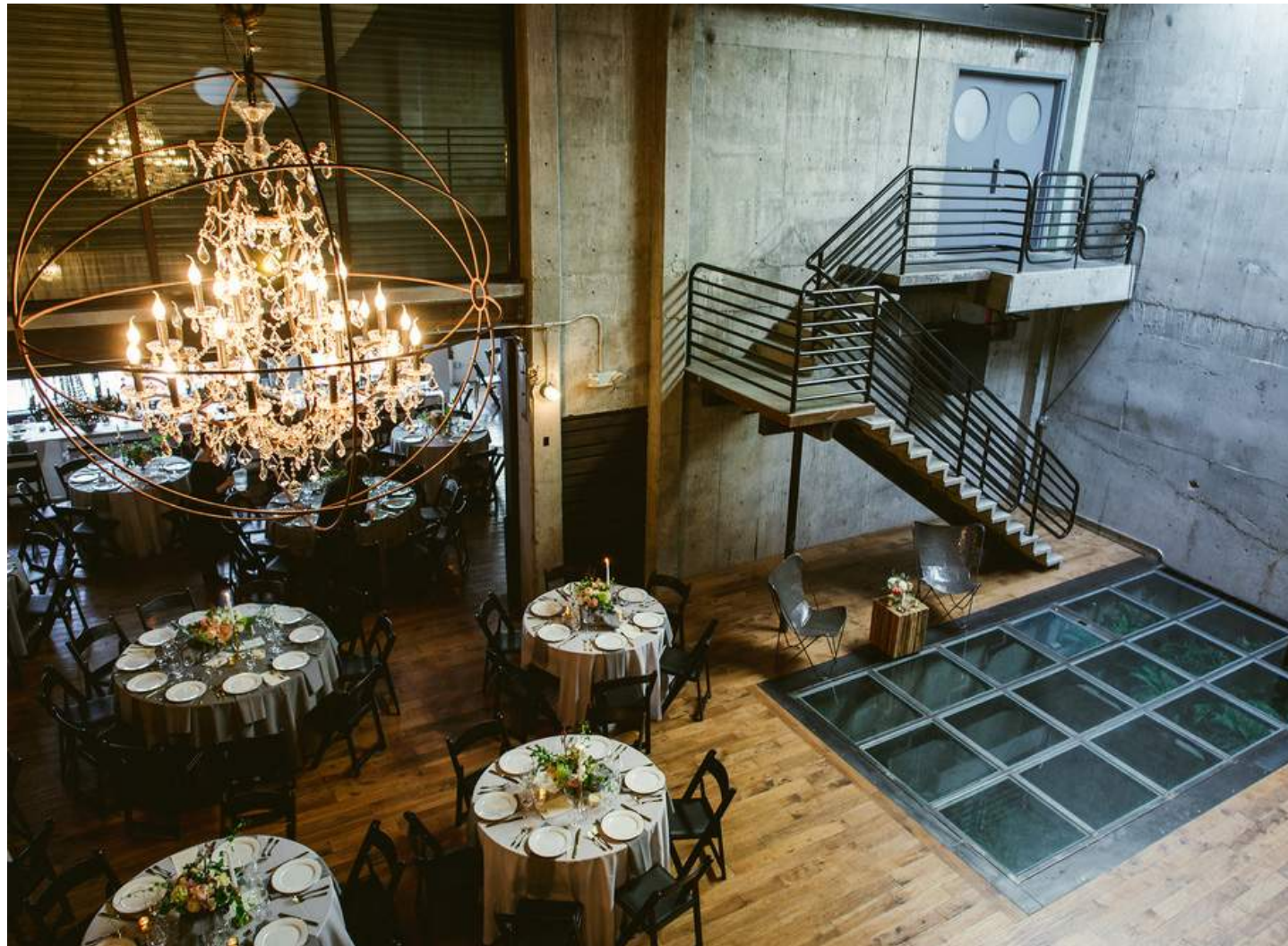
^ (both) Seattle Muses, ethical apparel production and job-readiness training for low-income and refugee communities. Located in SODO.

^ (both) FIORAVANTI, clothing designed and made in Seattle. Currently located in Beacon Hill.



Event Space, Coworking Offices

Many light industrial spaces are capable of being used in a variety of ways including event hosting. Coworking offices often support events for their members as well as the public.



^ The Fremont Foundry, an all-occasion event facility for your private party or wedding. The building was formerly an artist colony for more than three decades, located in Fremont.



^ (top) Coterie Coworking, offices plus lounge and bar, located in Downtown Seattle.



^ (bottom) WeWork Seattle, coworking office space located in South Lake Union.



^ (both) 325 Westlake, ground floor used for artist-in-residence studio space, weddings and events. Located in South Lake Union.





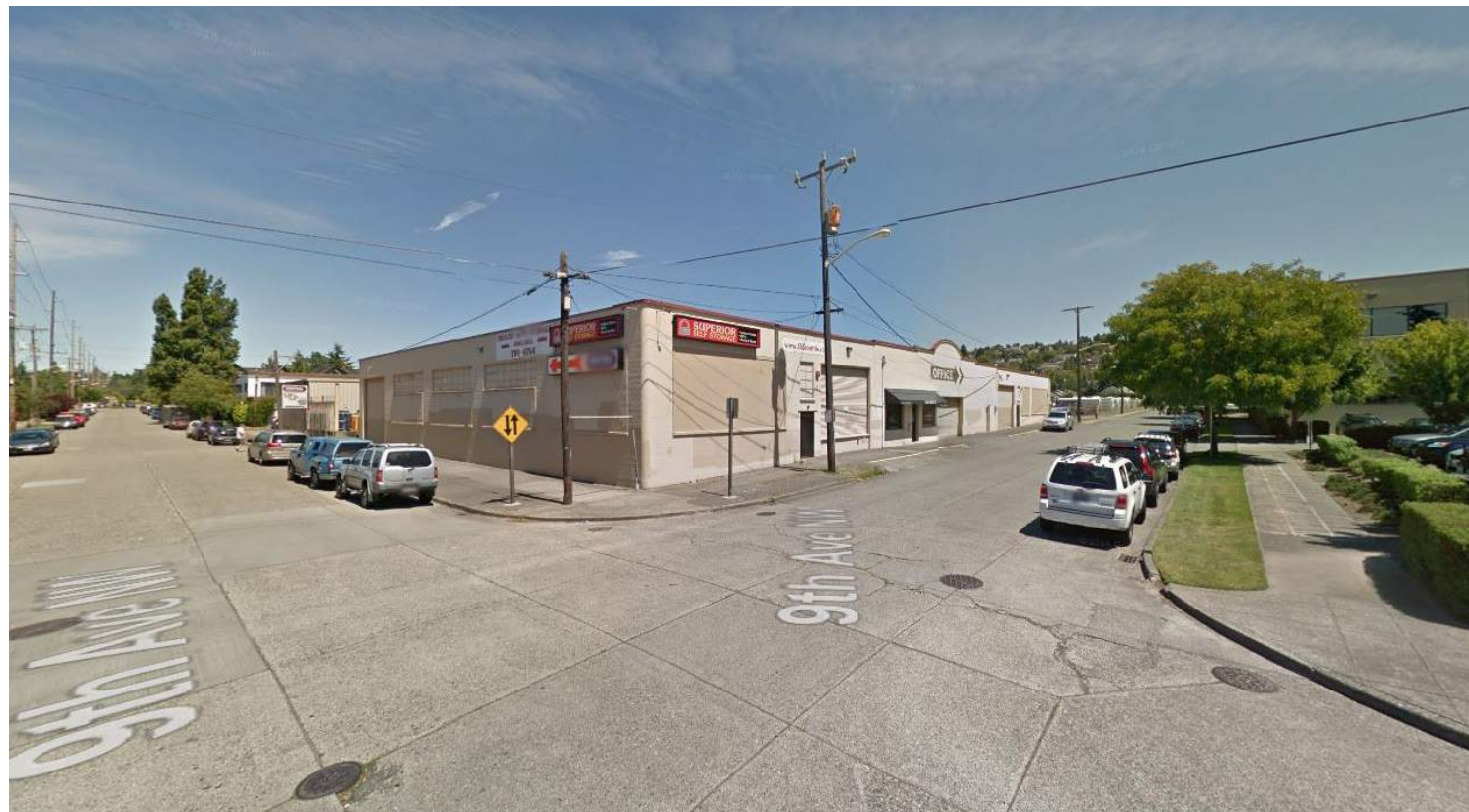
^ Aerial view of the project site from the South-East corner



^ Street view at North-West corner



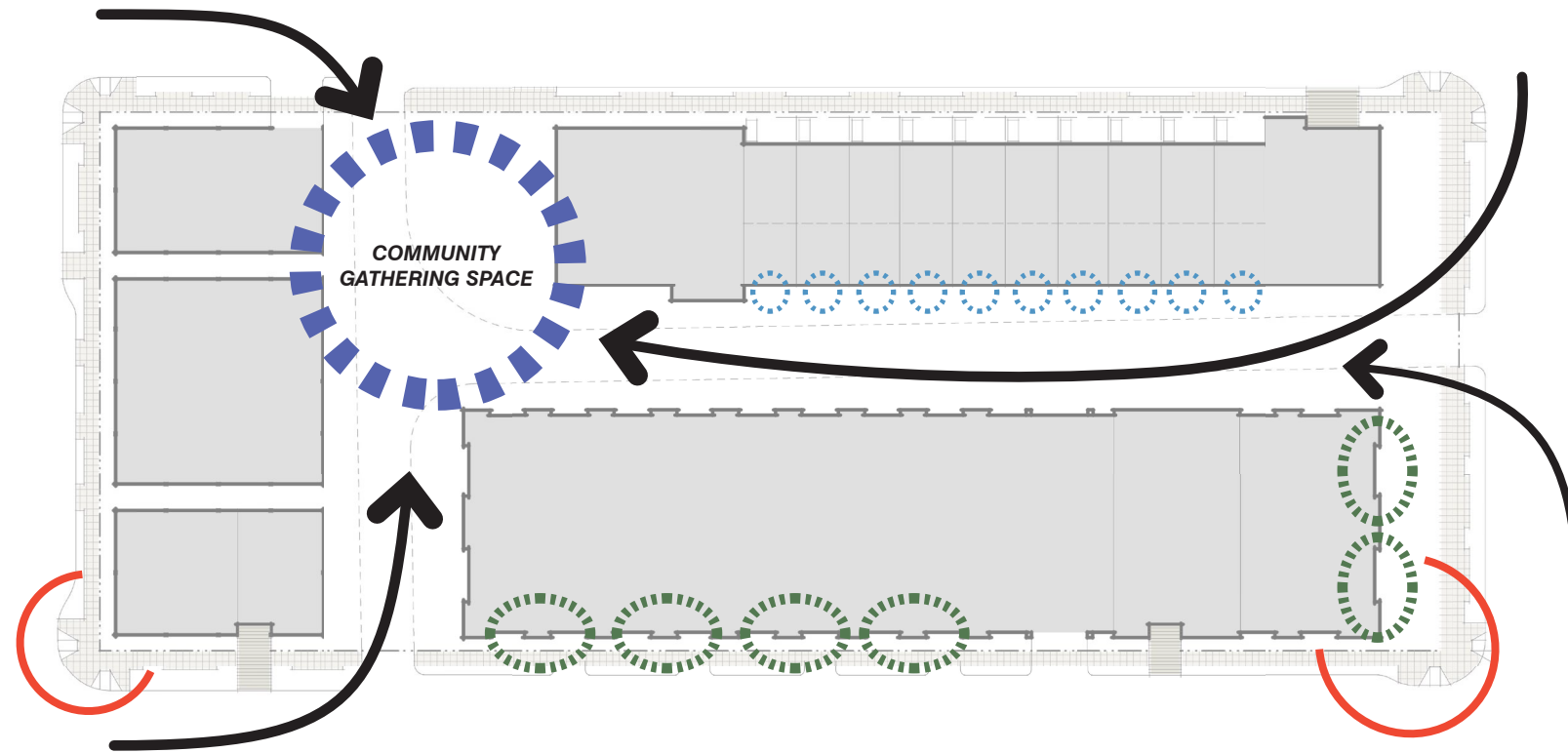
^ Street view at North-East corner



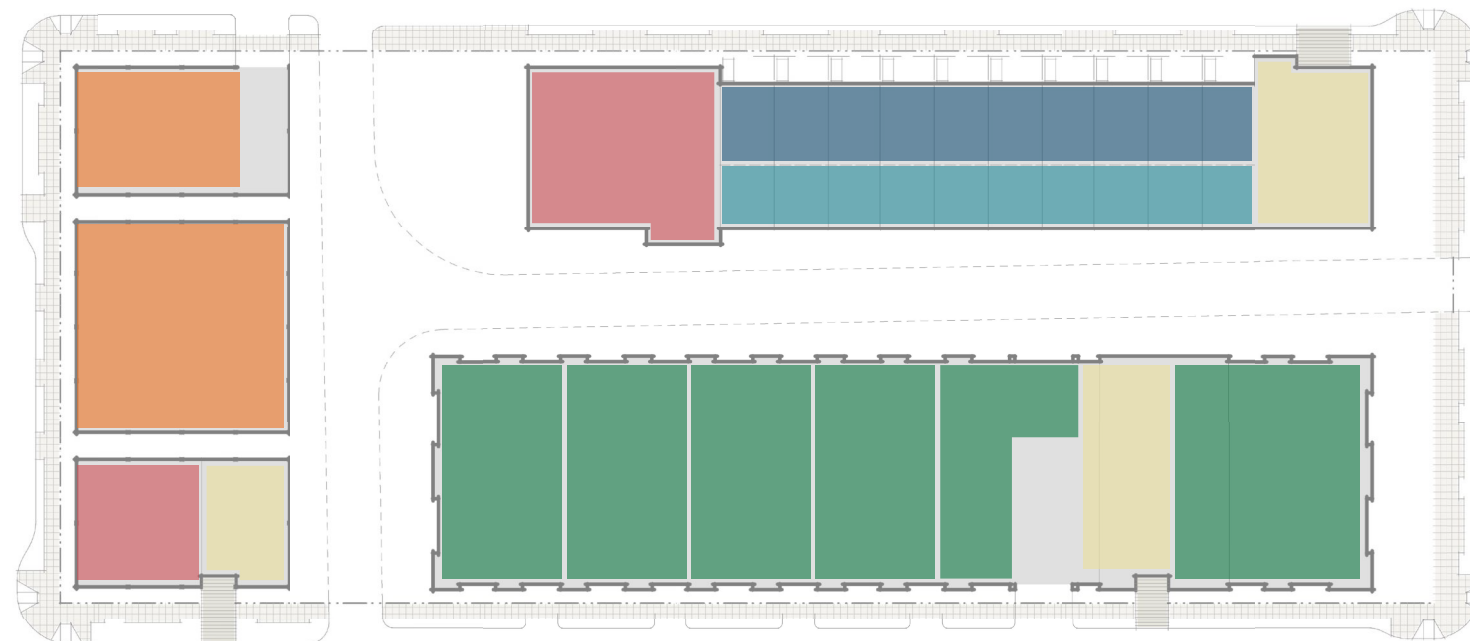
^ Street view at South-West corner



^ Street view at South-East corner



-  OUTDOOR COMMUNITY SPACE
-  WORKSHOP/PATIO
-  RETAIL/MANUFACTURING
-  PROMINENT URBAN CORNERS



-  BREWERY/DISTILLERY
-  RESTAURANT/BAKERY
-  WORK/LIVE RESIDENTIAL
-  MANUFACTURING/RETAIL
-  LOBBY/AMENITY





[ THE END ]

Holmes, Jim

---

**From:** Kirsten Graham <kirstlg@yahoo.com>  
**Sent:** Thursday, February 24, 2022 11:50 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** I Support Alternative 4 - CEM Site on Harbor Avenue

**CAUTION: External Email**

I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. I support alternative 4. 65-1

Kirsten Graham  
206-890-3435



Holmes, Jim

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**From:** Angela Greene <domsia2@gmail.com>  
**Sent:** Monday, February 28, 2022 11:32 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Alternative 4 - Future of Industry Expanded

**CAUTION: External Email**

*I prefer Alternative 4- Future of Industry Expanded. This allows for more flexibility in planning for new indoor sports facilities on idle properties that are on the edges of the MIC and away from shorelines. West Seattle residents have endured the bridge closure along with the pandemic. The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill.*

66-1

*I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. I support alternative 4.*

Thanks,  
Angela Greene

Sent from my iPhone

Holmes, Jim

Letter #67

**From:** Rita Hammerberg <ritaia@icloud.com>  
**Sent:** Tuesday, March 01, 2022 11:18 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Comments

CAUTION: External Email

I prefer Alternative 4- Future of Industry Expanded. This allows for more flexibility in planning for new indoor sports facilities on idle properties that are on the edges of the MIC and away from shorelines.

West Seattle residents have endured the bridge closure along with the pandemic. The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill.

67-1

Rita Hammerberg  
[ritaia@icloud.com](mailto:ritaia@icloud.com)  
206-932-7544  
6529 Beach Dr. SW  
Seattle, Washington 98136

#4

Letter #68

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, March 29, 2022 8:25:19 PM  
**Last Modified:** Tuesday, March 29, 2022 8:30:02 PM  
**Time Spent:** 00:04:42  
**IP Address:** 73.254.235.233

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Page 1: Draft EIS Comment

### Q1

After reviewing the Draft EIS, send us a comment to suggest how the analysis can be improved or any other concern or question you may have related to the Draft EIS.

68-1

- 1) Under the Urban Industrial, or Industrial & Innovation zoning changes, what ordinances will be in place / enforced during and beyond normal business hours to limit adverse impacts (noise emissions, logistics/traffic) to surrounding residential zoned parcels, or existing housing/residents.
  - 2) How does the SIMS address community concerns over lackluster enforcement of existing code (emissions, pollutants, operating hours, etc.) and hold industry accountable?
- 

### Q2

Please provide your name and email address.

Name **Robert Hanlon (South Park)**  
Email Address **robert@utilitysquared.org**

---

Holmes, Jim

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**From:** Sharon Huling <sharonhuling@gmail.com>  
**Sent:** Thursday, February 24, 2022 12:14 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Feedback regarding Seattle Industrial & Maritime Strategies

**CAUTION: External Email**

To whom it may concern:

I am a longtime resident of West Seattle. And I strongly support Alternative 4 because it allow for more flexibility to serve the sporting needs of our Seattle community.

I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. This will allow for indoor basketball, tennis and soccer for our kids and families during the many foul weather days (rainy!) in our PNW. I support alternative 4.

69-1

Thank you for your consideration.

Sharon Valdés Huling

Holmes, Jim

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**From:** Dylan Kartchner <dkartchner22@gmail.com>  
**Sent:** Friday, February 25, 2022 10:39 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Alternative 4!

CAUTION: External Email

Hello,

Reaching out to provide public comment.

I support Alternative 4- Future of Industry Expanded. This allows for more flexibility in planning for new indoor sports facilities on idle properties that are on the edges of the MIC and away from shorelines. West Seattle residents have endured the bridge closure along with the pandemic. The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill.

70-1

Gratefully,  
Dylan

Holmes, Jim

**From:** Andy Katz <katzaj@gmail.com>  
**Sent:** Wednesday, March 02, 2022 9:30 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Public Comment on Draft EIS for Seattle's Industrial and Maritime Strategy

CAUTION: External Email

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for Seattle's Industrial and Maritime Strategy.

Please amend the Draft Environmental Impact Statement to address the following issues:

- Engage communities to more clearly explain the purpose of this EIS, the difference between the proposed zones and the Alternatives, and the legislative steps yet to come; (See below for expanded thoughts on this) 71-1
- Address small business displacement fears since much of the environmental improvements expected under these new zones are reliant on new construction whose rents may be out of reach for tenant businesses
- Emphasize a greater partnership with Indigenous communities and Indigenous sovereignty 71-2
- Present a clear path to support daily air monitoring in Ballard - Interbay 71-3
- Prioritize dramatic visual cues in built environment to get people who are driving vehicles to slow down on major arterials and urban freeways, like 15th Avenue NW 71-4
- Address the power and values imbalance caused by freight lobby's political pressure, which causes an overemphasis on planning for freight travel in our city. 71-5
- Highlight the unique importance of Ballard-Interbay as a freshwater harbor which allows shipping fleets less destructive port environment for docking and repair of their ships 71-6

- Highlight BNSF’s historic and continuing lack of transparency and accountability 71-7
- Clarify which existing and proposed uses in the industrial areas will be considered nonconforming under the MML, II, and UI zones; Provide a comprehensive list of uses with active exemptions or that operate under amended development standards. (i.e. Storm practice facility) 71-8
- Clarify the definition of “industry supportive housing,” provide examples from other locations of mixed use housing/industrial, and propose thresholds for mixed use buildings 71-9
- Develop a complete list of the neighborhood-level comprehensive plan recommendations in areas that will be impacted by these zoning changes, and analyze whether they conform or contradict the Draft Comprehensive Plan Goal and Policy Language found in Appendix D 71-10
- Specify which groups of zoning changes within each alternative should be treated as divisible or as a cluster/group and describe why. (i.e. what are the issues with splitting Ballard Brewery District between UI and MML?) 71-11
- Add documentation, analysis, and maps that connect Seattle’s historic segregation, redlining, and exclusion to the present day location of industrial uses. 71-12
- Complete a city-wide analysis of zoning that looks specifically at the ways commercial and multi-family exclusions in other parts of the city lead to the competition for industrial land. Use maps of the entire city. 71-13
- Examine which recommendations and boundaries are carried over from older plans that have never been vetted for equity or impact, including transportation and public facilities. 71-14

*I would also like to direct you and Seattle residents to examine the comments submitted by the following organizations: Duwamish River Community Coalition, Seattle Cruise Control, and the Georgetown/South Park Advisory Group. Each of their perspectives is valuable, since I have primarily focused on Ballard-Interbay.* 71-15

In these comments, I want to emphasize the importance of additional scrutiny of the impacts of the systemic racist policies that created Seattle's industrial land and exacerbated the disparate impacts of pollution and disinvestment on nearby underserved neighborhoods of color.

The idea to rezone the city's industrial lands is a good one. However, the impacts listed in the draft EIS are not addressed by the mitigations proposed. There is a disconnection between the greenhouse gasses, soil contamination, and water pollution created by the city's industrial zones and their area of impact. That is because the underlying boundaries used to create the EIS study area and subareas are relics of inequities the EIS purports to address. The Environmental Impact Statement must struggle with the racialized history that formed our industrial areas in the first place.

71-16

### **I. Comments on the proposed zones.**

Seattle's existing industrial zoning designations are failing. The General Industrial zones are worded so broadly that grocery stores and mini-storage proliferate instead of employers who manufacture things. Car-intensive commercial uses are taking up space next to ports, rail, and vital infrastructure that cannot be moved or replaced.

71-17

The three proposed industrial zoning designations appear to recognize the changing needs of industry and its employment role. However, the actual text of the zones is not included in the document. These comments look to add information to the EIS in order to steer the creation of the zones during the legislative process.

1. Manufacturing, Maritime, and Logistics (MML) zone will replace most of the current general industrial zoning. As such, the EIS should be more explicit on which uses will become nonconforming uses. Not all commercial uses are unwelcome in industrial zones. Additionally, recent exceptions have been granted for developments such as the WNBA Storm practice facility. In lieu of extending an exemption and adding text to the hefty zoning ordinance, the code should be written to accommodate such uses. A



comprehensive list of uses with active exemptions should appear in the EIS.

2. The Urban Industrial (UI) zone will be established at the boundaries between industrial areas and urban villages. As discussed further below, Urban Villages are separated from waterways by industrial land. That would make some of the UI zoned properties the most desirable locations in the city for new homes, particularly penthouse units on top of a quasi-industrial space. This would accelerate issues of pricing out legacy industry in neighborhoods where that is already most acute. The EIS should be clearer on the definition of “industry supportive housing,” provide examples from other locations of housing on top of industry, and propose thresholds for mixed use buildings.

71-18

3. Industrial Innovation (II) zones are for areas around transportation hubs where office and manufacturing can coexist with transit. I find this zone very exciting with mixed uses between industrial and commercial as well as specifically stated support for pedestrian and cycling infrastructure. However, the current neighborhood plans and Comprehensive Plan have multiple provisions to separate bike and ped paths from industrial areas. The EIS does not examine where the II zone expressly contradicts existing neighborhood plans. Proposed changes to the Comprehensive Plan do not specifically address this issue. More broadly, the EIS should develop a complete list of the neighborhood-level comprehensive plan recommendations impacted by these zoning changes and analyze whether they conform or contradict the Draft Comprehensive Plan Goal and Policy Language found in Appendix D.

71-19

## **II. Comments on the proposed Alternatives.**

In discussing the EIS publicly, I have found many Seattleites are confused, including many in Share The Cities, that the three alternatives EIS are not aligned with three new zoning designations. The EIS Alternatives examine how much the new zones will be laid out across the city’s existing industrial areas. We agree that this is a smart way of setting up the EIS because it focuses the

71-20

discussion on specific locations rather than ephemeral concepts in zoning. But the document can be clearer about the distinction.

71-20  
cont.

I support Alternative 4 – The Future of Industry Expanded, only because there are no alternatives that more liberally use the UI and II zones across larger portions of the city. With time, we look for those zones to be used outside of the narrow boundaries of this EIS.

71-21

As the City Council moves to adopt the new industrial zones and the accompanying zoning map, they will be able to pick and choose between parts of the Alternatives. That means the boundaries can end up erratic and narrow due to legislative horse trading. The EIS must do a better job establishing why areas change under each of these Alternatives, and which areas should be treated as a cohesive cluster.

71-22

At the neighborhood level, the proposed maps do not offer a picture of cohesiveness. Besides raw acreage or numbers of houses, what does it mean if blocks are divided? Ballard’s Brewery District is a good example. It’s the area north of Leary Avenue on either side of 14th Avenue. Alternative 2 puts it in MML, Alternative 3 in Urban Industrial, and Alternative 4 sets it as Industry and Innovation. But the legislative process can split that apart. The EIS does not strongly justify what, if anything, is keeping these clusters together. (It should be kept together.)

71-23

Speaking of splitting the baby, it must be said that Alternative 1 should be considered a non-starter in its entirety. Even a compromise where some of the current industrial zones are maintained in certain areas should be dismissed completely. The current zoning ordinance is 1,400 unreadable pages. Adding a couple hundred more for new zones without removing any of the existing would be idiotic. The EIS should reflect

71-24

### **III. Comments on boundaries.**

While the proposed EIS Alternatives offer needed updates to industrial and manufacturing centers, they are stuffed within the existing boundaries of the current industrial zones. And that is the source of a much deeper problem. The

71-25

city's industrial boundaries themselves carry the history of segregation that cannot be washed away with a cursory equity analysis.

71-25  
cont.

This issue was brought up in scoping. In Appendix A, the EIS drafters respond to scoping comments that requested including an overview of historic land use actions by saying "The EIS will include a review of past plans and policies...Mitigation measures that further equity and environmental justice can be linked to this objective." (Scoping Report 4) In response to the request that the scoping include more area than just the existing industrial areas, the EIS states: "The City of Seattle, as the Lead Agency, has the prerogative to define the range of alternatives it studies in the EIS." (Scoping Report 7)

71-26

SDCI staff and consultants have made an extensive analysis of Seattle's industrial areas across 14 different categories, including land use, public services, geology, and noise. Each of these sections deep dives into the topic and compares possible impacts of each alternative.

But the EIS doesn't tell the story of how these industrial zones came to exist in their current locations. Take this paragraph from the Land Use section:

"Historical land use decisions also led to the location of multi-family housing in areas bordering industrial lands that caused environmental justice harms. Seattle's first zoning ordinance in 1923 and its major update in 1956 located multi-family residential districts at the edges of rail lines, industrial districts, and manufacturing districts. Relatively less affluent renters were exposed to noise and air quality and other impacts, while single family districts removed from the edges of industrial areas were not. The continued pattern of multi-family housing and zoning districts bordering MICs. Continues to be evident today in areas including Interbay and the northeast edge of Ballard." (DEIS 3-241)

While accurate, this obscures two important facts. First, not only were apartments located near industrial areas, but both industrial and multi-family uses were **excluded** from a vast majority of the city. Second, the pattern is not just evident today. It is our city's current policy.

71-27

Between racially restrictive covenants and apartment bans written into zoning, multifamily housing was actively pushed out of many Seattle neighborhoods. Exclusion from the remaining city is important in understanding the issues that the EIS is trying to address. The document lists six emerging factors affecting industrial lands:

- Pressures to convert industrial lands
- Emerging technologies and processes
- Unintended development
- Pending port, transportation, and new industrial building typology
- Environment and climate change
- Equity and accessibility

Three of these – conversion pressures, unintended development, and equity – are directly tied to forcing apartments and shops and factories to compete over a small portion of the city’s land. The fourth, Environment and Climate Change, is deeply tied to how pollution is concentrated in small areas and poisoning neighboring communities of color. There is not a map of the entire city in the EIS. They all cut off just above Greenlake. This is a city-wide rezoning of industrial lands, yet it does not show the whole city. It is impossible to develop policies that address land use and zoning issues without once mentioning the other side of the story – the portion of the city devoted exclusively to single-family housing.

More broadly, the EIS mentions patterns of exclusion and redlining as if they happened in the past. Exclusion and redlining are current issues supported by current policy. In Exhibit 3.8-2, the EIS did an amazing thing by combining the Urban Villages map with the Industrial Centers map, two that are not normally put together. They show that density never touches water, only industrial waterfront. Beaches are reserved for Seattle’s homeowners.

Examining Exhibit 3.8-2 (left above) side-by-side with the 1930’s Home Ownership Lending Corporation map (right above) that established mortgage patterns which “redlined” communities of color shows that nothing has

71-27  
cont.

changed in 100 years of Seattle's zoning. Industrial and downtown neighborhoods are left unshaded. "Undesirable" neighborhoods, still the city's most diverse, were in red. The boundaries of the industrial zones and urban villages are the same lines that separated White mortgagees from Black and industrial neighborhoods in the 1930s. (HOLC map from The Seattle Civil Rights and Labor History Project, University of Washington)

In the Seattle 2035 Comprehensive Plan from 2015, the Urban Village strategy is described as "places that **already have** active business districts and concentrations of housing" (Seattle 2035 10, emphasis added). This continued the Urban Village concept that was adopted in the 1994 comprehensive plan, where the first goal was to "Maintain and enhance Seattle's character" which it started to define as "large single family areas of detached houses." (Toward a Sustainable Seattle 5) That plan never once mentioned how many of those single family neighborhoods had restrictive covenants written into their deeds. The comprehensive plans did not break any barriers, they reinforced them and continue as the basis for zoning we have today. The EIS states "since MICs were established in 1994, there have not been large-scale alterations to their geographic boundaries." (DEIS 1-6) That same recognition can go back to the HOLC maps decades earlier.

71-27  
cont.

The EIS struggles to explain how new zones will overcome the disparate impacts to communities burdened by the impacts of industry. As extensively documented by the Duwamish River Community Coalition in their comments, many of the EIS mitigation measures come down to "new zones will prompt construction of new buildings that will be better." No matter how good a new building is, it cannot surpass the boundaries it is dropped into. And those boundaries have remained unchanged for 100 years. The industrial boundaries are steeped in systemic racism and continued by this Industrial and Maritime Strategy. The city is once again specifying factories and manufacturers are only allowed in certain areas that are next to communities of color. The boundaries are the segregation. This EIS maintains each and every one of them.

And that's the reason it's vitally important that this story be told within this EIS. There are 100 years of policies squeezed between that first Seattle zoning code

in 1923 and today. Each one builds upon the last. Unquestioningly carrying forward the framework of racial segregation and exclusion from one copy to another is just putting a new book cover on the same redlining manual. This EIS fails to recognize that chain, much less break it.

It is indeed the city's prerogative, as the Lead Agency, to define the range of alternatives it studies in the EIS. But that is exactly the same prerogative it has used to segregate and redline for the last century. While this EIS cannot single-handedly undo that damage, it can make some steps in the right direction:

1. Add documentation, analysis, and maps that connect Seattle's historic segregation, redlining, and exclusion to the present day location of industrial uses.
2. Complete a city-wide analysis of zoning that looks specifically at the ways commercial and multi-family exclusions in other parts of the city lead to the competition for industrial land. Use maps of the entire city.
3. Examine which recommendations and boundaries are carried over from older plans that have never been vetted for equity or impact, including transportation and public facilities.

71-27  
cont.

#### **IV. Conclusion and Summary of Comments**

These comments are not offered to summarily reject or undermine the Industrial and Maritime Strategy or the draft EIS. As said, the proposal to update the city's industrial zoning is good. The proposed zones have a lot of potential to reflect the new realities of manufacturing. They offer a chance for employers to be participants in the neighborhoods rather than kept segregated and apart. We look forward to making further comments during the legislative process to draft and locate the zones in order to prevent petty, classist, or biased exceptions. But the proposal is strong and having it on the table is a massive step forward.

71-28

However, the EIS is missing any recognition that the lines themselves are part of the issue. These historical boundaries made their own problems, and we are left to unquestioningly continue being constrained within them. To address the

impacts of the Seattle Industrial and Maritime Strategy, the Environmental Impact Statement must make robust efforts to understand history and the sources of inequity in shaping land use decisions. Without those components, the mitigations proposed are simply inadequate, and the City will set itself up for unlimited challenges as it moves ahead with this rezoning and the coming 2024 Comprehensive Plan.

71-28  
cont.

Thanks for your time and attention.

Andrew Katz - District 3 / 98101

Holmes, Jim

Letter #72

**From:** Richard K. <richardk4040@yahoo.com>  
**Sent:** Monday, February 28, 2022 11:51 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Please choose Alternative 4- Future of Industry Expanded

**CAUTION: External Email**

*I prefer Alternative 4- Future of Industry Expanded. This allows for more flexibility in planning for new indoor sports facilities on idle properties that are on the edges of the MIC and away from shorelines. West Seattle residents have endured the bridge closure along with the pandemic. The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill.*

72-1

regards,  
Richard Kromm

resident  
West Seattle



Holmes, Jim

Letter #73

**From:** Wayne Lau <whlau50@gmail.com>  
**Sent:** Monday, February 28, 2022 11:55 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Citizen comment on EIS Study, Port Property T5

CAUTION: External Email

I am a homeowner and resident on SW Harbor Avenue, just north of the subject site.

I support Alternative 4- Future of Industry Expanded, which allows for increase of allowable improvements/building square footage to 50,000 sqft. I would like to see a new indoor sports facilities on the parcel known as the CEM site on Harbor Ave SW.

73-1

West Seattle have endured the bridge closure along with the pandemic. The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill.

Sincerely,

Wayne H Lau

Holmes, Jim

---

**From:** Maggie Lewis/Bob Huppe <huppelewis@yahoo.com>  
**Sent:** Monday, February 28, 2022 12:09 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Alternative 4 - Future of Industry Expanded

**CAUTION: External Email**

To Whom It May Concern:

I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. I support alternative 4.

Even before the closure of the West Seattle Bridge, we were an 'island' of sorts. All manner of services and facilities could only be accessed by going out of West Seattle even though it hosts a population of about 90,000 people. In order for my son to use an indoor tennis court during our many inclement months, I had to drive him over Beacon Hill and into the Rainier Valley to go to the Amy Yee Tennis Center. According to a survey done on indoor sports facilities, West Seattle itself has easily enough people to support at least 10 indoor tennis courts. Undoubtedly there are other sports (soccer, basketball, baseball) that would also benefit from indoor recreation space. But that can't be done without increasing the maximum size allowed for indoor sports and recreation.

74-1

Please support Alternative 4.

Maggie Lewis,  
7011 - 46th Ave SW

**Holmes, Jim**

Letter #75

**From:** Robert Livingston <Robert.Livingston@homestreet.com>  
**Sent:** Tuesday, March 01, 2022 3:54 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Comment for Alternative 4

**CAUTION: External Email**

I prefer Alternative 4- Future of Industry Expanded. This allows for flexibility in planning new indoor sports facilities on idle properties that are on the edges of the MIC and away from shorelines. West Seattle residents have endured the bridge closure along with the pandemic. The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill.

75-1

Please also consider that it is adjacent to underserved neighborhoods along the Delridge corridor. Added sports facilities can strengthen neighborhoods, communities, and kids.

**Bob Livingston**  
Manager NMLS Id# 1778422

**Branch:** 206.433.3702  
**Direct:** 206.444.8024



**Southcenter Branch**  
130 Andover Park East  
Tukwila, WA 98188

Holmes, Jim

---

**From:** Bonnie Main <Bonnie@bonniemain.com>  
**Sent:** Thursday, February 24, 2022 11:55 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Comment on Alternative 4 - Future of Industry Expanded

CAUTION: External Email

I was pleased to learn through word-of-mouth in the West Seattle neighborhood about Alternative 4- Future of Industry Expanded.

Not sure if I have the title right, however, my understanding is that this will allow for more flexibility in planning new indoor sports opportunities, which is critically important given our cool/wet weather seasons. Studies show the importance of physical activity and we simply do not have many places, particularly in West Seattle.

I'm also a strong supporter of this because in a region where land is at a premium, I believe it is ***unconscionable to have idle properties that could otherwise be vibrant community hubs.***

West Seattle is an under-resourced community for healthy sports activities. It is time to invest in the area, creating a gathering place for residence and even those who don't live on the "Island" of West Seattle(!)

We need visionary leaders who see the potential of building on the vacant brownfield that is the former West Seattle landfill.

I hope you invest in this exciting opportunity. Bonnie Main

76-1

Holmes, Jim

Letter #77

**From:** Jon Mathison <Jon@advancedia.com>  
**Sent:** Wednesday, February 02, 2022 9:07 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Industrial and Maritime Strategy EIS

CAUTION: External Email

Hi,

The zoning for our neighborhood is industrial and it needs to change to multi-family residential and mixed use. We are what is called “industrial buffer” and located between Northwest Leary and Northwest 6th Street. Our neighborhood is easily walkable to multiple grocery stores (Fred Meyers, Trader Joes, PCC, Cash and Carry), bars, breweries, coffee shops, hardware store, arcade, and other great places. Our neighborhood sits at the nexus of the 40 bus and the 28 Express and its an easy walk to the D line and a more difficult walk to the 5 bus so it has incredibly good transit. This neighborhood sits right off the Burke Gilman trail and provides great access to Fremont, downtown, Ballard, and everywhere. Despite wonderful walkability, exceptional transit, and some of the best bike access in Seattle, this area is zoned “industrial buffer”. This is terrible and makes absolutely no sense. On our street there are 11 homes mixed with three commercial buildings, none of the commercial buildings do industrial work. The industrial buffer designation means that we can only build industrial projects on these lands. But industrial projects are not what is needed here. Housing is needed. This neighborhood would be an exceptionally good location for mid-rise and low rise multi-family housing development. New residents would enjoy the wonderful walkability, great transit, and the best bike trail access in Seattle. It is time that we end the so-called industrial buffer, and face that there is no industry need or want for this area east of Leary Way.

77-1

Thank you,

Jon Mathison, P.E.  
Electrical Engineer  
Advanced Industrial Automation Corp.  
617 NW 44<sup>th</sup> Street  
Seattle WA 98107-4432

[jon@advancedia.com](mailto:jon@advancedia.com)  
[www.advancedia.com](http://www.advancedia.com)

(206) 789-1373, ext 1003 (office)  
(425) 444-4751 (mobile)

Holmes, Jim

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**From:** Andrea Menin <ag.menin@gmail.com>  
**Sent:** Wednesday, March 02, 2022 10:25 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Draft EIS

CAUTION: External Email

Dear Commissioners,  
I prefer Alternative 4- Future of Industry Expanded. This allows for more flexibility in planning for new indoor sports facilities on idle properties that are on the edges of the MIC and away from shorelines.  
West Seattle residents have endured the bridge closure along with the pandemic. The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill.  
Please allow popular use of our shoreline.  
Thank you,  
Andrea Menin

78-1

Holmes, Jim

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**From:** Bree Olofson <breeolofson@msn.com>  
**Sent:** Monday, February 28, 2022 3:04 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Alternative 4- Future of Industry Expanded

**CAUTION: External Email**

I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. I support alternative 4. 79-1

Thank you,  
Bree Olofson

Holmes, Jim

---

**From:** Chuck Perry <chuckhperry@gmail.com>  
**Sent:** Wednesday, March 02, 2022 3:34 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Draft EIS

**CAUTION: External Email**

*I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. I support alternative 4.*

80-1



**From:** Wendy Personett <wpersonett@gmail.com>  
**Sent:** Saturday, February 26, 2022 11:54 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Comments on the Draft EIS - Alternative 4!

CAUTION: External Email

To City Leaders:

I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. I support alternative 4.

West Seattle residents have endured the bridge closure along with the pandemic. The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill.

Thank you,  
Wendy Personett

81-1

Holmes, Jim

Letter #82

**From:** maria phillips <mgirrrrl@yahoo.com>  
**Sent:** Monday, February 28, 2022 11:30 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** West Seattle Sports Complex

CAUTION: External Email

*I prefer Alternative 4- Future of Industry Expanded. This allows for more flexibility in planning for new indoor sports facilities on idle properties that are on the edges of the MIC and away from shorelines. West Seattle residents have endured the bridge closure along with the pandemic. The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill.*

82-1

*This facility will get a ton of usage! WE NEED IT!*

*Maria Phillips*

*Maria Phillips*  
Recology King County  
Artist In Residence Program Manager

<https://www.recology.com/recology-cleanscapes/artist-in-residence/>

206-251-1320

mariaphillipsstudio.com

Holmes, Jim

---

**From:** Kathryn Robinson <thatkathryn@gmail.com>  
**Sent:** Thursday, February 24, 2022 1:02 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** I support Alternative 4

**CAUTION: External Email**

To whom it concerns,  
I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. I support alternative 4. 83-1  
Sincerely,  
Kathryn Robinson

**Kathryn Robinson**

[www.kathrynrobinson.com](http://www.kathrynrobinson.com)  
@krobinsoncritic

Holmes, Jim

Letter #84

**From:** brett shaffer <b57412@yahoo.com>  
**Sent:** Tuesday, March 01, 2022 11:05 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Indoor sports complex harbor ave

**CAUTION: External Email**

*I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. I support alternative 4.*

84-1

Brett shaffer  
1526 alki ave sw #403  
Seattle wa

[Sent from Yahoo Mail on Android](#)

Holmes, Jim

Letter #85

**From:** Aaron Shaw <ashaw428@gmail.com>  
**Sent:** Thursday, February 24, 2022 11:52 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Comment on the Draft EIS

CAUTION: External Email

To Whom It May Concern,

I prefer Alternative 4- Future of Industry Expanded. This allows for more flexibility in planning for new indoor sports facilities on idle properties that are on the edges of the MIC and away from shorelines.

West Seattle residents have endured the bridge closure along with the pandemic. The City of Seattle can mitigate this hardship by allowing for a tremendous community asset to be built on the vacant brownfield that is the former West Seattle landfill.

85-1

Thank you for taking my opinion into consideration.

Aaron Shaw  
613 N 62nd St. Seattle, WA 98103

Holmes, Jim

Letter #86

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**From:** NANCY STANDIFER <NANCYSTANDIFER1@msn.com>  
**Sent:** Monday, February 28, 2022 11:29 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Alternative 4 - Future of Industry Expanded

**CAUTION: External Email**

Hello, I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline I support alternative 4.

86-1

Thank you for your consideration and for helping to increase the livability of West Seattle.

Nancy Standifer

Holmes, Jim

Letter #87

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**From:** Jill Strohmeier <strohj@comcast.net>  
**Sent:** Monday, February 28, 2022 11:33 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** West Seattle sport courts

**CAUTION: External Email**

*I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. I support alternative 4.*

87-1

Jill Strohmeier

Sent from my iPad

Holmes, Jim

Letter #88

**From:** Steve Sundquist <ssundquist@hotmail.com>  
**Sent:** Friday, February 25, 2022 11:45 AM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Draft EIS Comment

CAUTION: External Email

I support an increase in the maximum size of use for indoor sports and recreation uses to 50,000 sq. ft. subject to locational criteria near edges of MIC, and away from shorelines. The parcel known as the CEM site on Harbor Avenue sits on the edge of the MIC and is away from the shoreline. I support alternative 4. 88-1

Stephen Sundquist  
7211 36<sup>th</sup> Ave SW  
Seattle, WA 98126



Holmes, Jim

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**From:** Shawn <woodgraf@msn.com>  
**Sent:** Thursday, February 24, 2022 8:58 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy  
**Subject:** Alternative 4

CAUTION: External Email

Good morning,

The city is undergoing review of the industrial and maritime lands policies , please consider alternative 4 which allows for increased building size and expanded uses of industrial zones, specifically the property known as the CEM site on Harbor Avenue hat could one day be the home of the Seattle Sports Complex

89-1

Thanks,  
shawn wood  
West Seattle resident

Sent from my iPhone

Sent from my iPhone

#1

Letter #90

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, February 18, 2022 9:36:15 AM  
**Last Modified:** Friday, February 18, 2022 9:38:13 AM  
**Time Spent:** 00:01:58  
**IP Address:** 67.182.144.198

Page 1: Draft EIS Comment

**Q1**

After reviewing the Draft EIS, send us a comment to suggest how the analysis can be improved or any other concern or question you may have related to the Draft EIS.

1. Add documentation, analysis, and maps that connect Seattle's historic segregation, redlining, and exclusion to the present day location of industrial uses. 90-1
2. Complete a city-wide analysis of zoning that looks specifically at the ways commercial and multi-family exclusions in other parts of the city leads to the competition for industrial land.
3. Examine which recommendations and boundaries are carried over from older plans that have never been vetted for equity or impact, including transportation and public facilities.
4. Specify which groups of zoning changes within each alternative should be treated as divisible or as a cluster/group and describe why. 90-2
5. Ensure zoning around high capacity transit nodes extends out the full 1/2 mile in each direction. Do not allow it to extend only 1/4 of a mile. This will create unworkable pockets of this type of development. 90-3

**Q2**

Please provide your name and email address.

Name **Aiden**

Holmes, Jim

Letter #91

**From:** Rachel Schaeffer <rachels@cascadebicycleclub.org>  
**Sent:** Friday, April 15, 2022 1:54 PM  
**To:** OPCD\_Industry\_And\_Maritime\_Strategy@seattle.gov; Holmes, Jim; Wentlandt, Geoffrey  
**Cc:** Vicky Clarke  
**Subject:** Cascade Bicycle Club Industrial and Maritime Strategy DEIS Comment letter  
**Attachments:** Cascade Bicycle Club Industrial and Maritime DEIS Comment letter.pdf

**CAUTION: External Email**

Hello Jim Holmes and team,

Please see the attached letter that includes Cascade Bicycle Club's comments on the Industrial and Maritime Strategy DEIS. We look forward to the next stage of planning strategy to include engagement with, and planning for, the needs of people biking, walking and rolling through these industrial areas.

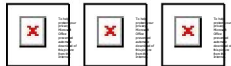
Sincerely,

--

**Rachel Schaeffer**  
Policy and Advocacy Manager  
*Pronouns: she, her, hers*  
(206) 620-0470



**SAVE THE DATE:** *The Bike Everywhere Breakfast is May 25 at Bell Harbor in Seattle.*





7787 62nd Avenue NE Seattle, WA 98115-8155  
P (206) 552-3222 • www.cascade.org • info@cascade.org

[f /CascadeBicycleClub](#) [t @cascadebicycle](#) [i @cascadebicycle](#)

April 15, 2022

To: Jim Holmes and the Seattle Maritime Planning Strategy Team

RE: Industrial and Maritime Strategy Draft Environmental Impact Statement

Cascade Bicycle Club is a statewide organization representing and advocating for the needs of people who bike - or want to - in Seattle and across the state. We are writing today in support of the Seattle Bike Advisory Board's comments and concerns regarding the Industrial and Maritime Strategy DEIS, as written below:

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.

91-1

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.

91-2



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P (206) 552-3222 • www.cascade.org • info@cascade.org

[f /CascadeBicycleClub](#) [t @cascadebicycle](#) [i @cascadebicycle](#)

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.

91-3

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.

91-4

**Perhaps of most relevance to the job-growth goals is 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.

91-5

New development standards must be adopted into the code around all industrial zoning that

91-6



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.

91-6  
cont.

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 – 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.

91-7

**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.

91-8

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.**

91-9

Thank you for taking the time to present to the Bicycle Advisory Board. While we are happy to



7787 62nd Avenue NE Seattle, WA 98115-8155  
P (206) 552-3222 • [www.cascade.org](http://www.cascade.org) • [info@cascade.org](mailto:info@cascade.org)

[f /CascadeBicycleClub](https://www.facebook.com/CascadeBicycleClub) [t @cascadebicycle](https://twitter.com/cascadebicycle) [i @cascadebicycle](https://www.instagram.com/cascadebicycle)

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.

91-9  
cont.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rachel Schaeffer', with a stylized flourish at the end.

Rachel Schaeffer

Policy and Advocacy Manager

Cascade Bicycle Club

Holmes, Jim

---

**From:** Alice Fong <alice@ethicalleadership.org>  
**Sent:** Friday, April 15, 2022 3:25 PM  
**To:** PCD\_Industry\_and\_Maritime@seattle.gov; Wentlandt, Geoffrey; Holmes, Jim  
**Cc:** Quirindongo, Rico; Harrell, Bruce; Harrell, Monisha; Burgess, Tim; McIntyre, Markham; Wong, Greg; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa; directors@georgetownneighborhood.com  
**Subject:** Comment on the Industrial & Maritime DEIS  
**Attachments:** 20220415 CEL DEIS Comment.pdf

**CAUTION: External Email**

Hello OPCD Team,

Thank you for all you do!

Attached is a letter for our comment on the Industrial & Maritime DEIS.

All the best,  
Alice :)

View the [uploaded video](#) on CEL's Youtube Channel  
Legacy Event: 30 Years of CEL - Celebrating Past, Present, and the Future.

*Make it a great day! :)*

**Alice Fong** | Chief Executive Officer | Center for Ethical Leadership  
1752 NW Market St, #952, Seattle, WA 98107  
[www.ethicalleadership.org](http://www.ethicalleadership.org) | [Donate!](#) | [YouTube](#) | [Sign-up for our e-Communication](#) | [Workshops](#)

*"Darkness cannot drive out darkness; only light can do that. Hate cannot drive out hate; only love can do that."* -  
Reverend Dr. Martin Luther King Jr.

*"Unity has never meant uniformity."* – Rev. Dr. Martin Luther King, Jr.





April 15, 2022

City of Seattle  
Office of Planning and Community Development  
P.O. Box 94788  
Seattle, WA 98124

RE: Comment on the Industrial & Maritime DEIS

Dear Office of Planning and Community Development,

Thank you for your dedication to serve Seattle residents by supporting thriving communities through an integrated and equitable approach to planning and community investments. Your commitment to work toward a city that is inclusive, affordable, vibrant, interconnected and innovative. And your pledge to partner with neighborhoods, businesses, agencies and others to bring about positive change and coordinate investments for Seattle communities. Seeing this statement on your website makes us proud to be part of the Seattle community.

Like you, one of our seven practices of leadership for the good of all is to consult wisdom from the margins. Ensuring those whose voices are often left out are not only elevated and heard, we are able to develop creative solutions together. CEL defines ethical leadership as knowing our core values and having the courage to live into them in all parts of our life. Drawing on our moral courage when it is hard and/or when decisions make things costlier, we do it anyways because the alternative is not acceptable. This is a daily practice.

Seattle's Equitable Community Engagement Ethos states that: Seattle wants to become a more equitable, livable, and sustainable city by centering community and racial justice in your planning, community development, and design processes and decisions. Your work will engage all residents of Seattle, in shaping the city's future and will prioritize giving voice and power to communities, especially BIPOC, that have been historically marginalized. We encourage you to stand by your commitment as is written on your website.

Please consider working more closely with community leaders living in the impacted neighborhoods such as, Georgetown Community Council, King County International Community Coalition, and many others to create a holistic, sustainable, and community-driven industrial lands strategy that makes a real and lasting difference in entrenched challenges of affordability, environmental impacts, and equity across Seattle.

All the best,

*Alice Fong*

Alice Fong  
Chief Executive Officer  
Center for Ethical Leadership

Holmes, Jim

Letter #93

**From:** Duwamish River Accountability Group <duwrvaccgroup98108@gmail.com>  
**Sent:** Friday, April 15, 2022 4:16 PM  
**To:** PCD\_Industry\_and\_Maritime@seattle.gov; Wentlandt, Geoffrey; Holmes, Jim; Harrell, Bruce; Harrell, Monisha; Burgess, Tim; McIntyre, Markham; Wong, Greg; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa; directors@georgetownneighborhood.com; Quirindongo, Rico  
**Subject:** Comment on the City's Industrial/Maritime Zoning Strategy

**CAUTION: External Email**

Dear OPCD,

The DEIS study did not take into account the actual impacts on a practical level that industrial and manufacturing activity have on the residential neighbors living in the Duwamish Valley.

We demand that the Industrial & Maritime Strategy Plan DEIS take the time to include actual impacted community members' experiences due to the decades of prior poor planning/zoning in South Park and Georgetown, especially regarding industrial land use which have caused pollution, a shorter life expectancy and harm to Seattle's only river and all people who live and work in the Duwamish Valley.

It is imperative this area gain green spaces and an abundance of native trees and plants in Georgetown and South Park in the Duwamish River floodplain to counteract the circumstantial changes of industry and pollution. There are Cultural artifacts mapped under all Duwamish River floodplains. This would disqualify this area from being developed into large buildings without destroying the precious antiquity of the landscape.

We depend on the City to look at these drafted plans with a true equity lense and consider the negative environmental impact to Duwamish Valley inhabitants.

We as a community deserve equal justice and to exist in a more harmonious being.

Duwamish River Accountability Group

93-1

**Holmes, Jim**

Letter #94

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**From:** Erica Bush <erica@dvsafeststreets.org>  
**Sent:** Friday, April 15, 2022 9:52 AM  
**To:** Holmes, Jim; Wentlandt, Geoffrey  
**Cc:** holly krejci; Jesse Moore; Adrienne Hampton; Kelcey Valdez; Clara Cantor; Michelle Benetua  
**Subject:** Duwamish Valley Safe Streets Comment on Industrial and Maritime Strategy  
**Attachments:** DVSS\_Maritime Industrial Lands Letter.pdf

**CAUTION: External Email**

Hello Jim and Geoffrey,  
Thank you for adding the Duwamish Valley Safe Streets comments to others in regards to the Industrial and Maritime Strategy. We hope that these comments and others made by fellow Duwamish Valley organizations will be considered seriously as these decisions impact the lives of all of our community members within the Valley and beyond.

All the best,  
Erica

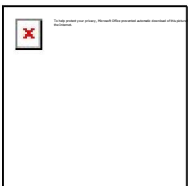
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**Erica Bush**

Lead Organizer

she | her | hers

**Duwamish Valley Safe Streets**





## DUWAMISH VALLEY SAFE STREETS

City of Seattle

4.15.2022

Office of Planning and Community Development (OPCD)

Via email OPCD\_Industry\_And\_Maritime\_Strategy@seattle.gov

Re: Industrial and Maritime Strategy Draft Environmental Impact Statement

Dear Office of Planning & Community Development (OPCD):

Thank you for taking the time to read our input on The Industrial and Maritime Strategy Draft Environmental Impact Statement. In Line with the Bicycle Advisory Board (BAB) as well as The Duwamish River Community Coalition (DRCC) the Duwamish Valley Safe Streets would like to further reiterate concerns for the current proposed alternatives within this plan.

94-1 While we appreciate your time and the work that your department has done regarding the land use types around transit stations in the alternative plans these isolated improvements fall quite short in providing the transformative vision for this area that is long overdue. As noted by the letter addressed to you by the DRCC this plan holds a great opportunity to set right many wrongs historically acted upon this land and it's residents for well over 100 years. This area has been ravished by only being viewed as a location for financial gain and not for the resource rich and deeply seeded community that it is. This area is capable of being the most innovative and restorative lands in Seattle once again and these alternatives are settling for simply continuing the inequities and shortsightedness of the past.

The members of Duwamish Valley Safe Streets stand with our fellow community members in great concern that the process for this planning effort and 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. These decisions have impacts to the functionality of our city as whole as well as great environmental and resiliency implications. Such critical decisions should only happen after a complete outreach process that wraps discussions of the future of industrial zoning into the Comprehensive Plan process so that decisions which will impact all of Seattle can be discussed and comprehended by all of Seattle. The Duwamish Valley comprises a large portion of Seattle's land mass. We cannot see it as an isolated area which should only serve one purpose.

94-2 The Duwamish Valley Safe Streets organization has fought hard for the small improvements to the safety of the Duwamish Community. These alternatives undermine that effort and future efforts. We must put the safety and health of our communities are the forefront of these decisions. Everyday our community members face conflicts with large vehicles, poorly defined and unimproved roadways, the lack of sidewalks, and rough railroad tracks in addition to the poorest air quality in our city. We ask those with the least access to resources to continuously

put themselves and their families in danger and these alternatives do not indicate any means of altering that reality.

The Duwamish Valley Safe Streets requests the City of Seattle take the following actions regarding the Industrial Maritime Strategy Planning:

94-2  
cont.

- We must have feedback from and address the needs of community members who move in and throughout this landscape by walking, biking, and other non-motorized forms through industrial areas.
- Land use decisions in this area must be led by the environmental historical inequities of this landscape. There should be clear methods for how industry and human activity can work in harmony with the restoration of the landscape as a guiding principle.
- As job growth in this area continues, we cannot further rely on the tens of thousands of workers to reach their centers of employment by single occupancy vehicles. We must integrate better planning for pedestrian and bicycle routes to and from these jobs centers as well as public transportation investments.

The Duwamish Valley is a key connection between West Seattle, South Park, and other parts of South Seattle with downtown the entirety of this landscape needs to be safe for people to exist within, not just small pockets of areas within Georgetown and South Park. By continuing to treat these areas in an isolated fashion we will only further the combative relationship to industrial uses.

Currently all the continuous north-south streets are freight corridors, lined with industrial zoning. This has made efforts to create safe routes through this area almost impossible. Deliberate and careful changes to zoning could allow for improvements that would encourage businesses to locate where they can best take advantage of a safe bike route for their employees and patrons and increase access to much needed resources to those in the area like healthy food options, health care, green spaces etc.

Finally, the issues of pollution and climate change are poorly addressed by all options. This valley is historically responsible for mitigating the changes in sea-level throughout the year. We know how much sea-level rise will only continue to impact this city and these decisions have great impacts on whether this area can function in this critical environmental means moving forward. We have all but diminished the natural environment within this valley with heavy industry continually contributing to poor air and water quality that affects the health of cyclists and all citizens moving around the industrial lands.

94-3

This plan is short sighted in not accepting that rising sea levels will soon be inundating portions of the maritime industrial lands, making them unusable and presenting health risks. Duwamish Valley Safe Streets would like to re-iterate the statement made by the Bicycle Advisory Board that, "Both 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."

"The DEIS unfortunately lacks any concrete measures for holding the city accountable to address these hazards and 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 recommits to maintaining heavy industry on the waterfront land of the Duwamish People. "

94-4

Thank you for hearing our concerns. While we are happy to see that the strategy provides for some adjustment in land uses in the industrial areas, the approach taken within this document falls short in many of the most critical areas impacting this community and is far too limited. We must recognize the level of injustices and disinvestment this area has historically received and make a clear path forward for changing these approaches. We ask that any changes to industrial land uses should be wrapped into the process for the Comprehensive Plan and involve a more robust and equitable outreach effort throughout the city. If Seattle truly wants to demonstrate a more equitable future, it's time to demonstrate that approach in a meaningful and real way.

Sincerely,

Duwamish Valley Safe Streets

**Holmes, Jim**

Letter #95

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**From:** Sam Farrazaino <sam@equinoxunlimited.com>  
**Sent:** Friday, April 15, 2022 4:42 PM  
**To:** Quirindongo, Rico; Holmes, Jim; Wentlandt, Geoffrey; Harrell, Bruce; Harrell, Monisha; Burgess, Tim; McIntyre, Markham; Wong, Greg; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa; Georgetown Community Council; Greg Ramirez; paulina; Velma Veloria  
**Subject:** Industrial And Maritime Strategy DEIS Comments  
**Attachments:** Industrial and Maritime Strategy DEIS Comments SF 04.14.2022.pdf

**CAUTION: External Email**

Dear OPCD Team, Mayor Harrell, and City Leadership,  
Thank you for the opportunity to comment on the Industrial and Maritime Strategy Draft Environmental Impact Statement.  
Please find my comments attached.  
We can do better as a City and I look forward to the trust and relationship building that this process has started!

**Samuel Farrazaino**

**Equinox Development Unlimited LLC**  
Creating space for limitless possibilities

206.890.3283  
[sam@equinoxunlimited.com](mailto:sam@equinoxunlimited.com)

Samuel Farrazaino  
Principal

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sam@equinoxunlimited.com

April 14, 2022

To: Seattle Office of Planning and Community Development

RE: Draft Environmental Impact Statement Comments

Dear Rico Quirindongo and the OPCD Team,

Thank you for the opportunity to comment on the Seattle Industrial and Maritime Strategy Draft Environmental Impact Statement. This work and the possible outcomes are incredibly important to the future of our communities and our City as a whole and will have predictable and unpredictable effects for generations to come. If we get this right, it could help change historic paradigms and make way for a better future for us all. If we get it wrong, it will exacerbate the traumas our communities have suffered, and will continue to suffer, from previous red lining and zoning decisions, environmental catastrophes, and inequitable civic processes.

I appreciate your efforts to extend the comment period for the Georgetown and South Park Communities to have a more meaningful engagement in this process. I believe it was a good step in starting to build trust and relationship with people who have historically been left out of these types of processes and who, up until this effort were specifically left out of this one.

I believe the communities of the Duwamish Valley are encouraged by the idea that this could be the start of a meaningful relationship with the City. One that will capitalize on the breadth and depth of knowledge and experience of the people who live work and play here, in concert with the City to fulfill all the pledges and commitments it has made and the dreams and aspirations we all have for our environment and our communities; residential, business, industrial, and maritime alike.

I support the Duwamish Tribe, The Duwamish River Community Coalition, The Georgetown Community Council, The King County International Airport Community Coalition, The Georgetown Merchants Association, Georgetown Community Development Authority and many other community organizations, businesses, and individuals in their enthusiasm for a better relationship with the City, better engagement now and in the future, and their concerns related to this DEIS specifically. Many of them have or will give you their comments separately and I hope you will acknowledge this comprehensive, invaluable, lived experience and knowledge to guide you in your next steps.

I personally, guided by my experience living, working, playing, creating and doing community development in Georgetown and the Valley, offer the following comments:

I was a member of the Mayor's Industrial and Maritime Strategy Advisory Council, and it was both an honor and a challenge to be a part of this engagement, community process and politics. Witnessing

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firsthand the incredible resource of all the minds and skills of the people who contributed to this work and at the same time struggling against the political inertia that has held our City back from its potential for a very long time.

This was an opportunity to rise above the historical inequities that have delivered our current short-sighted reality and really dig deep for positive structural change that could shift that paradigm towards race and social justice, environmental equity, and a community in which everyone has the opportunity to thrive. The stated principles that guided this process were incredible in their aspiration and while they gave us a goal to shoot for, we as a group, in an effort to reach “consensus” only made a few small steps towards realizing them. We had the potential to think big and act bigger, but in many ways we bowed to the status quo and gave in to the pressure of fear instead of the possibility of a better City for everyone, industrial, maritime, business and residents alike.

95-1  
cont.

I have come to realize that the depth and breadth of community engagement needed for a truly inclusive process was not achieved and thusly the strategies we laid out and this resulting DEIS are not a true representation from the voices of the entire communities affected by these potential changes. I see the work done by the Advisory Council as a good distillation of the issues and a foundation that the greater community should have the opportunity to weigh in on, assess it’s efficacy, and co-create a more comprehensive approach to proceed.

**Pause this process and take the time and actions needed to authentically engage all of the stakeholders to either validate the premise and details of this DEIS or create a new one.**

Our industrial lands make up 12% of our City and support 15 % of our jobs. As we embark on the updates to the Comprehensive Plan and Transportation Plan and others, we would be missing a valuable opportunity to be truly comprehensive in our approach to planning the future of our City if we silo this work and don’t consider all the intersections with these other major Plans. The City has laid out some very engaging processes for these major Plan updates, and the same processes would net a much more community informed result for this work, especially if it’s integrated with those major Plans. There are so many ways in which planning for our whole City will affect our Industrial Lands and vice versa, it is misguided to think we can keep these processes separate and achieve a good result for anyone. The proposed “block by block” planning/changes does not serve us well when issues like freight mobility and bike/ ped safety collide, there are big picture systems approaches needed at the industrial district level to keep freight moving and everyone safe. These and other intersections need to be considered in our major planning processes.

95-2

**Integrate the Industrial and Maritime Strategy and any potential Alternatives, including the No Action Alternative, into the Comprehensive Plan process.**

If the City decides to move forward with this current DEIS, the intersections between each of the impacts studied currently in silos need to be considered together and cumulatively. Studying the 14 affected environments, impacts and mitigations separately discounts the intersectional and cumulative effects that currently plague our communities and that will get worse if not planned for and ultimately mitigated. Environmental Equity, Affordability and Resilience all depend on the ability to mitigate the past, current, and future issues, and it will take systems thinking and proactive planning to realize these aspirations. We

95-3

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cannot continue to silo these issues and believe that we can solve for them individually, we need systemic solutions to these systemic problems.

95-3  
cont.

**Study the intersectional and cumulative impacts of the 14 affected environments in the DEIS and plan for and enact mitigation measures to address these exponentially more intense impacts.**

Any change in zoning has the potential to have positive and negative effects for the existing community. If zoning changes are instated and then left to the free market to take advantage of, the resulting development has the distinct risk of displacing the current industrial, maritime, business or residents. In any of the alternatives that include changes, the city will need to create very specific requirements or covenants to minimize that risk. The City should seek the input of the current community to understand the potential dangers to the existing owners, tenants and occupants and to the community as a whole, and then solve for those issues before making the changes. This could include requirements for affordable housing or affordable commercial space, right-sized space to accommodate small business, community preferences for tenant selection or other neighborhood support mechanisms. This could also include environmental cleanup and mitigations.

95-4

**Institute mechanisms to protect current community before, or in conjunction with, making zoning changes.**

The DEIS as written today does not take into account current uses at the parcel and building level and how those uses contribute to or detract from the goals of the potential changes. Information about what is actually happening in these buildings would determine the efficacy of current zoning and where possible changes could be effective, or not. Some of the proposed parcels to be changed will not result in a change of use anytime soon as they are properties that are going to be held in their current use for the foreseeable future, i.e. the WSDOT facility or the College. There are also vast swaths of other properties that effectively transitioned out of industrial zoning decades ago and have just not been inventoried or recognized by this process.

95-5

**Inventory actual use of all properties to determine efficacy of potential changes or effects of no-action.**

The current proposed changes to zoning and the new allowed uses for the limited residential increases do not seem to “pencil out” for new development, although there may be limited potential for remodel redevelopment. It seems that if any developer was actually able to make the numbers work, that the rental price would be so high that the stated goals “to foster increased employment and entrepreneurship opportunities with a vibrant mix of affordable, small-scale places for light industry, makers, and creative arts, as well as industry supporting ancillary retail or housing spaces” would not actually be possible. In that case the most likely scenario would be the creation of high end “boutique” space at or above current market rates. The inevitable result of this type of market rate development is that it will put pressure on the industrial neighbors and sooner or later displace those uses, which does not support the goal to “create better, integrated, and healthier transitions at the edges between industrial areas and neighboring urban

95-6

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villages, residential, and mixed-use areas.” Quite the opposite it brings the residential face to face with the next line of industrial.

95-6  
cont.

**Study the actual financial implications and market conditions to validate the efficacy of your assumptions and adjust the alternatives, either in location or development capacity, to suit the stated goals.**

The current process and alternatives do not satisfy the “Guiding Principles” Mayor Durkan laid out for the Industrial and Maritime Strategy in the following ways:

*Use the power of local workers and companies to chart a blueprint for the future using the principles of restorative economics to support the cultural, economic, and political power of communities most impacted by economic and racial inequities*

This process consolidated the power in the hands of the few and discounted those communities it was meant to support, and the alternatives, including the no action alternative, will continue these economic and racial inequities by strengthening the status quo and not allowing community to participate meaningfully in the process.

95-7

*Strengthen and grow Seattle’s industrial and maritime sectors so communities that have been excluded from the prosperity of our region can benefit from our future growth*

This process and all the alternatives do strengthen the industrial and maritime sectors in the short term, but the short-sighted resistance to change will eventually result in industry being displaced, and the jobs and benefits will go with it. The way it is currently structured it will continue the benefit of the few at the expense of the many historically excluded communities, and those communities will inevitably suffer from any future growth as it comes without proactive planning and commitment and enforcement to mitigate it’s negative effects..

*Promote equitable access to high quality, family-wage jobs and entrepreneurship for Black, Indigenous, and People of Color through an inclusive industrial economy and ladders of economic opportunity*

Until we address the systemic barriers to opportunity and solve for challenges like the lack of affordable housing near the jobs, lack of educational access, and the displacement of industry, none of which get addressed in these alternatives, we will not be able to meet this principle.

*Improve the movement of people and goods to and within industrial zones and increases safety for all travel modes*

Without comprehensive district wide planning as part of our major Plan updates, we will not be able to solve for the safe movement of people and goods because we will continue to patchwork our networks to facilitate our block by block zoning changes and uses.

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*Align Seattle's industrial and maritime strategy with key climate and environmental protection goals*

Without an intersectional and cumulative approach to assessing the alternatives and a commitment to not only recognizing the shortcomings but being willing to step back and create better alternatives in consultation with community, we will not be able to meet climate goals and we will not have environmental justice for our communities.

*Develop a proactive land use policy agenda that harnesses growth and economic opportunities to ensure innovation and industrial jobs are a robust part of our future economy that is inclusive of emerging industries and supportive of diverse entrepreneurship.*

The current alternatives, especially the no action, are not proactive and will result in the growth passing by the industrial sector in Seattle or dragging it out to Kent for cheaper rent. The proposed alternatives to bring innovation and industry don't overcome the environmental cleanup costs and challenges or recognize the current trends in development. If no one can afford to build it or we don't have the infrastructure to support it, it will not happen. We need other alternatives to achieve these goals.

**Study how no action or proposed alternatives tangibly and directly improve economic, environmental, and health disparities or continue the historic disenfranchisement of the Duwamish communities.**

In discussions and process towards building consensus in the Industrial and Maritime Strategy Advisory Council, the City indicated that it could study a much more significant infusion of housing into the Industrial areas in a separate effort from this DEIS.

- Please explain why this needed to be in a separate process and could not be included in this DEIS
- Please indicate what progress towards this has been made, if any.
- If no progress yet, is there a plan for this and can community support the City in making this happen?

I believe studying all the possibilities gives the City the knowledge needed to design the proactive land use policy agenda that it aspires to. Without knowledge we are operating in an environment of fear for the unknown and are stuck with the status quo until the current paradigm fails. This work would align with the principles of this Strategy process and many other published goals, aspiration and commitments of the City of Seattle.

**Studying an expansion of housing into the Industrial areas as a means to preserve existing manufacturing and jobs, create new modern manufacturing and industrial jobs, increase residential and commercial affordability, bring environmental investments, increase safety, and bring better outcomes for our BIPOC communities, should be done as soon as possible so potential benefits can be incorporated into our Comprehensive Plan process.**

Samuel Farrazaino  
Principal

**E Q U I N O X**  
DEVELOPMENT UNLIMITED, LLC

The 11<sup>th</sup> strategy identified in the Industrial and Maritime Strategy calls for the establishment of a stewardship entity to oversee and champion this work and bring together representatives of the full range of stakeholders who stand to gain or lose from decisions and actions regarding our industrial land. This would be an ongoing body that could take a comprehensive approach to previous and current efforts, policies and situations on the ground to ensure a continuity of work and a proactive plan for the evolution of our industrial areas.

95-10  
cont.

This stewardship entity would be an invaluable resource in this DEIS process and in any future work, including the effort to weave this work into Comprehensive Plan update.

**Convene the Strategy Council and Community Based Organizations to identify and recruit stakeholders from all constituencies to form and maintain the stewardship entity now so it can carry this work forward with authentic engagement.**

95-11

Again, I appreciate your willingness to dig deeper into community and incorporate the concerns and supports into your decisions.

Thank you for your continued belief in a better City for All, it is possible if we bring all people into our decision making processes, build trust to build relationships, honor our commitments, work to reconcile our past, and bring everyone into our future!

We all do better when we all do better!

With deep respect,



Sam Farrazaino  
Principal  
Equinox Development Unlimited LLC

Equinox Development Unlimited LLC's mission is to partner with public and private entities, to facilitate the creation and preservation of affordable arts and cultural spaces, and to support the communities that sustain those spaces.

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Holmes, Jim

Letter #96

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**From:** Greg Ramirez <gpramirez@gmail.com>  
**Sent:** Thursday, April 14, 2022 11:24 PM  
**To:** Wentlandt, Geoffrey; Holmes, Jim  
**Cc:** Quirindongo, Rico; Harrell, Bruce; Harrell, Monisha; Burgess, Tim; McIntyre, Markham; Wong, Greg; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa; Georgetown Community Council  
**Subject:** Georgetown Community Council Comment on Industrial & Maritime DEIS  
**Attachments:** 04.14.22 - GCC DEIS Comment.pdf

**CAUTION: External Email**

Dear OPCD and City leadership -

Attached please find the Georgetown Community Council's comment on the City's Industrial & Maritime Draft Environmental Impact Statement. We believe significant change is needed to achieve a progressive, affordable, and sustainable strategy that meets the needs of Georgetown residents, small businesses, and workers. We look forward to your response, and we remain ready to collaborate on this effort.

96-1

Best,

Greg Ramirez, on behalf of the Georgetown Community Council



April 15, 2022

Georgetown Community Council  
PO Box 80021  
Seattle, WA 98108

**RE: Comment on the Industrial & Maritime DEIS**

Dear OPCD Team,

The Georgetown Community Council (GCC), with endorsement from the King County International Airport Community Coalition (KCIACC) is writing to provide our feedback on the City of Seattle’s Draft Environmental Impact Statement (DEIS) regarding the Industrial & Maritime Strategy. While the DEIS and Strategy make welcome adjustments to zoning practices and move a small pocket of land out of the Duwamish Manufacturing Industrial Center (MIC), these changes are ultimately marginal. The DEIS and overall Strategy fall significantly short of meeting the needs and priorities of Georgetown residents, small businesses, and workers.

Our comments are as follows:

- We are glad to see the updated zoning concepts put forward by OPCD. In particular, we believe the Urban Industrial (UI) zoning has the potential for increased affordability, sustainability, and equitable outcomes if pursued and implemented well by the City. It also offers potential opportunities for more connectivity and better protections between the residential and heavy industrial areas of our neighborhood.

**However, the areas of Georgetown that are zoned UI in the DEIS will make no material changes to the lives of neighborhood residents and small businesses for the foreseeable future.** The vast majority of land that is zoned UI is owned by organizations that likely have no intention to sell - now or in the future. Examples include (in Alternatives Two and Four):

- Land along Ellis Ave that is owned by King County (Boeing Field), which may actually pursue expansion into the residential areas in the coming years; and

- Land along Corson Ave that is owned by the Washington State Department of Transportation, South Seattle College, and the Puget Sound Industrial Excellence Center.

While the City claims that UI zoning can create more substantive buffers between Georgetown residents and heavy industry - a longtime request of the neighborhood - the choice of locations for the UI zoned areas are nominal. **In addition, there are other zoning options that the City does not allow residents to consider - like Commercial 2 - that would create functional buffer zones between residents and heavy industry AND more accurately capture what is already happening in the area than Maritime, Manufacturing, and Logistics (MML), UI, or Industry and Innovation (II) zoning.**

It is also worth noting that a significant amount of land that is currently zoned Commercial 2 (C2) in the neighborhood - surrounding the Airport Way S and S Hardy St intersection - is industrial in practice due to its use by or proximity to Boeing Field. Historically, when industry encroaches on residential and commercial spaces, the loss of non-industrial land is not made up for elsewhere. This practice must end. For this reason, it's crucial that the City study additional expansion of buffer zoning - including C2 and Mixed Use - throughout the neighborhood to mitigate against likely future losses in non-industrial land.

We wish to connect the entire neighborhood, not just the "Triangle" along Airport Way S between Corson Ave S and S Bailey St. The DEIS alternatives are effectively incomplete because they do not study the impacts of additional types of zoning other than the three put forward by OPCD. **We urge the City to create legitimate buffer zones between residences and heavy industry by extending the UI zones currently proposed in Alternatives Two and Four and by studying the impacts of other, non-industrial types of zoning. Fundamentally, Georgetown residents are looking for a decrease in MML zoning, as it creates adverse impacts to our health and quality of life.**

- At its most ambitious (Alternative Four), the DEIS still zones 87 percent of industrial land as MML, which represents only a three percent adjustment from current zoning. Lands zoned as MML cannot accommodate new affordable housing which, as the City knows, Georgetown and South Park stakeholders identified as a top issue that must be addressed in the Industrial & Maritime Strategy. These lands also allow the continued proliferation of heavy industry, which has an outside impact on resident health outcomes and quality of life.

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cont.

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**Frustratingly, the City's understanding of Georgetown continues to be completely out of sync with the reality on the ground. Much of the land the City has zoned as MML has - in reality - been full of mixed uses for decades.** For this reason, we ask that the City study updating the following areas from MML to zoning that does not allow heavy industry to proliferate, including UI, Mixed Use, and/or Commercial:

1. The entire area from Orcas St. to E Marginal Way and Corson Ave to 1st Ave S;
2. The Corson Building and Elysian Brewing located at the intersection of Airport Way S and Corson Ave S and Airport Way S and S Lucille St, respectively; and
3. Extend buffer zoning (UI, Commercial, or Mixed Use) along Airport Way S all the way to S Lucille St AND extend buffer zoning to the other side of Airport Way S all the way to the railroad. Current Mixed Use zoning proposals under Alternatives 2 and 4 only include one side of Airport Way S.
  - a. Along the added side of Airport Way S, consider UI so it preserves artist studios and allows for light industrial uses.

This is not a radical shift in industrial and maritime zoning practices. **It is simply truing up the zoning to reflect the reality of our neighbors who already live and conduct business there.** In addition, this would create a meaningful buffer zone between our residential areas, thriving commercial core, and heavy industry. This would also allow for more housing and more investment in the kinds of maker and artist studios that Georgetown prides itself on.

- A fundamental flaw of the DEIS process is that the accompanying mitigation measures are merely suggestions, and will not be put forward as binding legislation eventually passed by the City Council. **This means that impacted residents citywide are forced by the City to make decisions that will have substantive and lasting impacts on their health and wellbeing without any commitment from the City to solve those issues.** The City - when issuing the Final EIS - must send companion binding legislation to the City Council that codifies and funds recommended mitigation measures.
- The DEIS makes zoning changes that need accompanying policy commitments in order to maximize their impact. **For example, rezoning part of Airport Way from Industrial to Mixed Use has lots of potential benefits for the neighborhood. However, it requires accompanying policies from the City - such as commitments regarding historic preservation and affordable housing - to ensure the zoning changes align with the policy intent of the neighborhood, and don't exacerbate affordability and equity issues.** The City - when issuing the Final EIS - must send companion binding legislation to

96-4  
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96-6

the City Council that codifies and funds policy commitments that center affordability and equity alongside zoning changes.

96-6  
cont.

- While we appreciate OPCD’s recent work to come into our communities and talk directly with our impacted neighbors, overall, the engagement process for both the Industrial & Maritime Strategy and the DEIS has been deeply inadequate. **The policies being proposed and studied in the Strategy and DEIS impact every single resident, small business, and worker in and around the industrially zoned areas. However, the engagement process relied primarily on input from traditional stakeholders who have historically had access to power and influence.** The GCC supports the Duwamish River Community Coalition’s request for a year-long extension to the DEIS to allow for meaningful engagement with impacted residents.

96-7

**For these reasons, the GCC calls on the City to fold the DEIS process into the Comprehensive Plan update, which is just beginning. There is an opportunity to make these issues accessible and compelling for residents across impacted communities. That approach must center language access, meeting people where they are, and community co-design.**

96-8

This approach aligns with the timing of the robust engagement plan proposed for the Comprehensive Plan update. It would allow the Industrial & Maritime Strategy to get the attention from the City and community that it deserves by being included in OPCD’s well-designed [community outreach strategy](#).

Working together, we can create a holistic, sustainable, and community-driven industrial lands strategy that makes a real and lasting difference in entrenched challenges of affordability, environmental impacts, and equity across Seattle. The GCC remains ready to support these efforts.

Thank you for the opportunity to comment, and we look forward to the City’s response.

Sincerely,

Greg Ramirez  
Chair  
Georgetown Community Council

Velma Veloria  
Chair

King County International Airport Community Coalition

Holmes, Jim

**From:** Adrienne Hampton-Clarridge <adrienne@drcc.org>  
**Sent:** Friday, April 15, 2022 11:54 AM  
**To:** Holmes, Jim; Wentlandt, Geoffrey; Goldberg, DavidW; Quirindongo, Rico; PCD\_Industry\_And\_Maritime\_Strategy  
**Cc:** Paulina Lopez; Georgetown Community Council; Erica Bush; maria@dvahc.org; Velma Veloria; Greg Ramirez  
**Subject:** Duwamish Valley Joint Comment Letter: Industrial and Maritime Strategy Draft Environmental Impact Statement  
**Attachments:** Final Joint Draft EIS Comment Letter DRCC to OPCD - April 15 2022-2.pdf

**CAUTION: External Email**

Dear Office of Planning & Community Development (OPCD):

Thank you for the opportunity to comment on the City of Seattle's Industrial and Maritime Strategy Draft Environmental Impact Statement.

This letter (find attached) is submitted on behalf of the Duwamish River Community Coalition, in collaboration with Georgetown Community Council (GCC), King County International Community Coalition (KCIACC), Duwamish Valley Safe Streets (DVSS), and the Duwamish Valley Affordable Housing Coalition (DVAHC).

We write to express our collective concerns regarding the Draft Environmental Impact Statement (DEIS) analysis, proposed land use updates, and community engagement process since its inception. From our world view, the DEIS is deeply connected to the history of white settlement, heavy industrialization, and discriminatory housing policies that have left the Duwamish Valley community fighting for the advancement of environmental and climate justice for decades to come. The City must remain accountable to its actions and prioritize the wellbeing of the Duwamish Valley community over industry and profit in the Industrial and Maritime Strategy.

97-1

Please find our collective comment letter attached.

We look forward to hearing from you.

Sincerely,  
Adrienne



April 15, 2022

City of Seattle  
Office of Planning and Community Development (OPCD)  
Via email PCD\_Industry\_And\_Maritime\_Strategy@seattle.gov

RE: Industrial and Maritime Strategy Draft Environmental Impact Statement

Dear Office of Planning & Community Development (OPCD):

Thank you for the opportunity to comment on the City of Seattle's Industrial and Maritime Strategy Draft Environmental Impact Statement. This letter is submitted on behalf of the Duwamish River Community Coalition, in collaboration with Georgetown Community Council (GCC), King County International Community Coalition (KCIACC), Duwamish Valley Safe Streets (DVSS), and the Duwamish Valley Affordable Housing Coalition (DVAHC).<sup>1</sup> We write to express our collective concerns regarding the Draft Environmental Impact Statement (DEIS) analysis, proposed land use updates, and community engagement process since its inception. From our world view, the DEIS is deeply connected to the history of white settlement, heavy industrialization, and discriminatory housing policies that have left the Duwamish Valley community fighting for the advancement of environmental and climate justice for decades to come. The City must remain accountable to its actions and prioritize the wellbeing of the Duwamish Valley community over industry and profit in the Industrial and Maritime Strategy.

The Industrial and Maritime Strategy is an opportunity for the City of Seattle to right the wrongs set forth by the white settlement and early industrialists of the Seattle area, an issue of zoning and land use change. In addition, the strategy presents a unique opportunity for the City to reconfigure processes for on-going, low-barrier, multilingual community engagement regarding land use updates for a more inclusive and fair engagement process. More so, the Industrial and Maritime Strategy should not move forward independently of the Comprehensive Plan, Seattle Transportation Plan and Freight Master planning.

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<sup>1</sup> *The Duwamish River Community Coalition. DRCC/TAG is a non-profit that seeks to amplify and lift up the voices of the Duwamish River Valley community members, specifically those most harmed by the combined impacts of climate change, health disparities, and environmental and economic inequities. DRCC/TAG's mission is to elevate the voices of those impacted by Duwamish River pollution and other environmental injustices to advocate for a clean, healthy, and equitable environment for people and wildlife.*

While we are glad OPCD granted two extensions for public comment, including a special accommodation for Duwamish Valley neighbors, the community engagement process remained insufficient. For a community facing a myriad of intersecting challenges we advocated for full authentic community engagement as stated in the City of Seattle Duwamish Valley Program’s environmental justice guiding principles and the Duwamish Valley Program’s racial equity outcomes to avoid perpetuating the very injustices and inequalities in the Duwamish Valley.<sup>2</sup> The insufficiency also holds communities' frustration towards the City of Seattle's disregard of long-standing advocacy on issues, such as industrial pollution, that remain unresolved and will be made worse by an increasing population and activities proposed by the Industrial and Maritime Strategy (Alternatives 3 and 4).

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While we champion workforce development and new housing opportunities for moderate to very low-income neighbors, existing environmental and health disparities must be eliminated before passing a strategy that will increase the number of residents who are exposed to environmental hazards, perpetuating the disproportionate exposure to environmental pollution in our geography. **To do this, we strongly urge the City to move legislation forward that increases environmental regulation standards, defines cumulative impacts and ensures all mitigation measures in the DEIS will be implemented without challenge.**

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**To protect and support industry and Port operations without procedural justice and higher environmental standards for the residential communities of South Park and Georgetown ignores the reality of today and should not be acceptable to any of us.** In this way, the DEIS is not separate from the history of the Duwamish River and the vibrant communities in its proximity. Thus, land use planning must prioritize the recommendations made by the long standing communities that have borne the burden of industrialization in the City of Seattle for generations.

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**The Duwamish river is a living reflection of what the City has been as well as who and what the City of Seattle can be.** This letter first explains why strong environmental standards and meaningful engagement of the diverse Duwamish Valley community is necessary to eliminate negative cumulative health impacts experienced everyday, and why the DEIS must check the integrity of its data analysis and mitigation measures to eliminate bias and injustice towards a community that has long been affected by racism rooted in environmental and land use planning and policy.

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## ANALYSIS

### I. THE DEIS MUST ACKNOWLEDGE THE HISTORY OF SEATTLE AND THE INDUSTRIALIZATION OF THE DUWAMISH RIVER

Until the 20th century, the Duwamish River was a rich, meandering river with areas of mudflats and marshes. In the early 1900s, the lower section of the river was straightened and dredged for industrial development. By the 1940s, channelization had transformed a 9-mile estuary into the 5 miles we know today was the Duwamish River, a

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<sup>2</sup> [http://greenspace.seattle.gov/wp-content/uploads/2018/06/DuwamishValleyActionPlan\\_June2018.pdf](http://greenspace.seattle.gov/wp-content/uploads/2018/06/DuwamishValleyActionPlan_June2018.pdf)

Superfund Site.<sup>3</sup> More than 97% of the wildlife habitat that existed in the Duwamish River was destroyed. During this same time period, the City of Seattle was a segregated city; racial restrictive covenants and deed restrictions compounded by systems of discrimination prevented Black, Indigenous, Asian Americans, Pacific Islanders, Hispanic and Latino populations from renting, buying or occupying property in most parts of the city.<sup>4</sup> Because of this, nonwhite Seattle neighbors were locked into census tracts of South Seattle and this residential pattern remains well established today.

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cont.

The significance of including the history of the Duwamish River and segregation in the City of Seattle is to shed light on the intersectional nature of land use and zoning change and its role in discriminatory practices that still impact Seattle today. Therefore, the DEIS disregards its responsibility to respond to the pollution disparities caused by decades of exclusionary land use decisions and harm done to communities of color. This history is woefully underscored in the DEIS, lacking honest accountability for past harms still impacting community today.

**Because of this, we view the DEIS as a process with serious implications that cannot be rushed and must undergo rigorous community review, environmental and public health analysis to ensure decisions do not leave neighborhoods like the Duwamish Valley highly exposed to environmental hazards, odors, noise, traffic and unfair opportunities to engage in decision-making processes during a global pandemic.**

New research from the University of Washington and the University of California at Berkeley explains how residents in communities like the Duwamish Valley are exposed to greater levels of significant air pollutants compared to communities living in Home Owners' Loan Corporation (HOLC) better-graded sections of the same city.<sup>5</sup> The census tracts in the Duwamish Valley are ranked highest in the state for diesel NOx pollution and disproportionate burden.<sup>6</sup>

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Despite emerging research, long-standing community advocacy for strong environmental standards and consideration of cumulative impacts, the DEIS continues to move forward without resolution for stronger environmental standards that will increase health equity for current and future Duwamish Valley residents.

**If the City of Seattle moves forward with the Industrial and Maritime Strategy, comprehensive rules for increased environmental standards and protections from displacement driven by market forces must be enacted before its adoption. In addition, UI areas must be expanded to buffer, strengthen preservation of homes and prevent future displacement of neighbors who deserve equitable access to the benefits of nature.**

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<sup>3</sup><https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-sites/Lower-Duwamish-Waterway/Site-history>

<sup>4</sup> [https://depts.washington.edu/civilr/segregation\\_maps.htm](https://depts.washington.edu/civilr/segregation_maps.htm)

<sup>5</sup> <https://pubs.acs.org/doi/10.1021/acs.estlett.1c01012>

<sup>6</sup> Wash. Dep't of Health, Env't Health Disparities Map <https://fortress.wa.gov/doh/wtnibl/WTNIBL/> (Diesel Pollution and Disproportionate Impact").

## II. THE DEIS EQUITY, ENVIRONMENTAL JUSTICE ANALYSIS, AND MITIGATION RECOMMENDATIONS ARE BIASED AND INCOMPLETE

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Today, the Duwamish Valley is a predominantly non-white, “near port”, and environmental justice community along the Duwamish River in Seattle. Large swaths of the Duwamish Valley are in the top 5% of communities nationwide with the highest proximity to traffic and traffic volume, and highest exposure to diesel PM pollution.<sup>7</sup> In addition, the Duwamish Valley Youth-led Moss Study found “hotspot” areas where high levels of ambient arsenic, chromium, nickel, cobalt exist.<sup>8</sup>

The DEIS concentrates solely on land use change and ignores a deep consideration for justice and intersectionality of community health and well-being. The equity and environmental justice analysis does not adequately reflect current public health data or incorporate community driven research stories into its data review. **Because of this, the authentic experiences of living in the Duwamish Valley in close proximity to industry are excluded, presenting a bias of how the information in the DEIS was collected, analyzed, interpreted and presented. In addition, existing data evaluated within the DEIS is inaccurate and must be addressed before moving forward to ensure credibility.**

Examples of inaccuracy include:

### A. Public space:

*“In Georgetown and South Park neighborhoods (within and outside of the Georgetown portion of the Greater Duwamish MIC) access to public space is comparable and, in some cases, better than the City as a whole. Georgetown and South Park scored 77 and 80 (Public Space Access Score out of 100) respectively in comparison to Seattle which scored 73.”<sup>9</sup>*

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Data points on public space paint a false picture and correlates with concerns regarding active transportation. The neighborhoods of South Park and Georgetown are surrounded by highways, centered in the heart of Seattle's freight corridor. In this way, access to public space is highly limited and often a risk to public safety. While community projects are underway, Georgetown and South Park have some of the lowest tree canopy coverage in Seattle and many existing parks remain inaccessible due to contamination cleanup and lack of welcoming infrastructure.

None of these alternatives aim to base their approach on a regenerative model of planning. None of them are rooted in the needs of the land and healing a space that remains a home to our cities most vulnerable in terms of both people and nature. Seattle has made great promises within the City's Equity and Environment Agenda and these alternatives fall short in all areas of this identified agenda.

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<sup>7</sup> U.S. Env't'l Pro. Agency, EJScreen 2.0, <https://ejscreen.epa.gov/mapper/> (“People of Color” Socioeconomic Indicator).

<sup>8</sup> <https://static1.squarespace.com/static/5d744c68218c867c14aa5531/t/5f10f3cae34eb20502407d57/1594946507283/Duwamish+moss+Fact+Sheet+final.pdf>

<sup>9</sup> Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.12, page 3-477



**B. Air Particulates:** Dust impacts from increased VMT in the area is not covered in the DEIS.

The soils in the Duwamish Valley are notoriously fine, therefore very dusty, and with many unpaved curbs and no sidewalks in many areas, which could result in crease dust/PM10 impacts in certain locations.

**C. Air quality:**

*“Overall, the air quality in the Puget Sound has continued to improve to meet the standards, though the number of wildfire-impacted days has increased in the last five years.”<sup>10</sup>*

Duwamish Valley lacks a comprehensive air monitoring network that provides sufficient disaggregated air quality data. For an environmental justice community, disaggregated data is critical for understanding “hotspots” or areas that hold high levels of pollution. The DEIS fails to include sufficient disaggregated data for the Duwamish Valley. These hotspot areas are not captured in the current monitoring stations closest to MICs reviewed in the DEIS, thus the claim that air quality has improved overall (including for the Duwamish Valley) is inaccurate.

**D. Freight:**

*“Exhibit 3.10-40 Impacted Study Corridors—GreaterDuwamishMIC,2044 – The Duwamish Valley study areas excludes the majority of South Park and Georgetown neighborhoods, where freight also frequently travel and park in addition to the West Seattle Bridge detours.”<sup>11</sup>*

The Duwamish Valley is disproportionately impacted by diesel pollution because it is a high traffic transportation corridor. Three freeways border the Duwamish Valley: Interstate 5, Highway 99, and the West Seattle Bridge. During the two years that the West Seattle Bridge has been closed for repairs, an average of 100,000 vehicles per day have been rerouted through the Duwamish Valley.<sup>12</sup> Numerous major trucking routes pass through Georgetown and South Park, carrying freight from the Port of Seattle, and nearby industry. Goods movement is one of the largest sources of air pollution in Washington State, 75% of heavy duty trucks pass-through the Duwamish Valley. In this way vehicles miles traveled (VMT) is important to understand how much pollution a truck emits over the course of the year based on how many miles it traveled over the course of the year. To not include comprehensive data of the Duwamish Valley is a job half done.<sup>13</sup>

<sup>10</sup> Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.2, page 3-29

<sup>11</sup> Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.10, page 3-418

<sup>12</sup> City of Seattle, West Seattle Bridge Program, <https://www.seattle.gov/transportation/projects-and-programs/programs/bridges-stairs-and-other-structures/bridges/west-seattle-bridge-program>.

<sup>13</sup> Exhibit B. Fehr & Peers, City of Seattle – Zero Emission Area Data Collection, at 16 (Sep. 2, 2021).

Furthermore, the DEIS also fails to mention correlating public health data such as the high hospitalization rates for children and adults living in the Duwamish Valley compared to the rest of Seattle.<sup>14</sup>

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### III. MEANINGFUL ENGAGEMENT WITH A WHOLEHEARTED EFFORT TO REACH THE DIVERSITY OF THE DUWAMISH VALLEY COMMUNITY FALLS SHORT

**The initial process to submit public comment was not designed for meaningful involvement of the Georgetown and South Park Duwamish Valley community, inhibiting procedural justice and fair opportunity to provide comment. Failing to properly inform the community for a public comment process with timely multilingual tools is an environmental injustice as the community holds significantly less resources compared to the industries also included in the DEIS.** For example, it is unacceptable for a public comment period to be open without the existence of publicly accessible translated materials.

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While the City's OPCD expressed aims to build relationships around the topic of the DEIS, diverse representation of the community remained low during the public comment process. This outcome conflicts with the race and social justice initiative commitments of all City staff, operations, policies and practices.

### IV. MITIGATION RECOMMENDATIONS ARE NON-NEGOTIABLE AND MUST BE IMPLEMENTED

It is concerning that mitigation recommendations for the DEIS are not true commitments considered by the Strategy. **This means that impacted residents are asked to volunteer their time to provide feedback on mitigation measures without any reassuring commitment from the City to follow up and solve deep rooted issues regarding environmental hazards and chronic issues of injustice.**

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More troublesome, trade offs and mitigation methods to resolve existing community concerns are not fully analyzed, future predictions for 2040 are unclear, and too much of the DEIS relies on a network of citywide initiatives not yet fully realized. Community needs clear environmental justice standards and equitable safeguards for anti-displacement in a rapidly changing city included in the mitigation analysis. It is unfair to resolve all environmental justice concerns by proposing redevelopment in the community while industry remains protected.

Areas that need significant mitigation and reassurance include:

- **Active transportation:** Environmental and transportation solutions noted are centered in small areas and don't take into account the systems of connectivity and intertwining that the area needs.

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<sup>14</sup> <https://southseattleemerald.com/2021/02/28/opinion-clean-air-everywhere-for-everyone-in-washington/>

*“Significant impacts were identified to both active transportation and safety due to the projected increase in people walking and biking in areas with network gaps and the increased potential for vehicle conflicts (particularly trucks) with vulnerable users.... Therefore, it is expected that the Action Alternatives could have significant unavoidable adverse impacts to active transportation and safety.”<sup>15</sup>*

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- We support the comments of the Seattle Bike Advisory Board. Both people and natural systems don't exist within isolated areas; they are greatly impacted by the activities that surround them.
- Each alternative only further perpetuates South Park and Georgetown remaining isolated and at odds with industrial usage all around them, treating them as islands unto themselves.
- The impacts of the King County International Airport and paused expansion are not fully considered, including the fuel farm and current lead pollution from aviation activities and must be addressed.

- **Air quality:** Increased GHG emissions is a step backwards and fails to account for regional goals around emission reduction and must be addressed to avoid impacts related to climate change.

*“All alternatives—in particular alternatives 3 and 4—contribute to increased GHG emissions through future growth and development in the study area. All Action Alternatives result in GHG emissions above the 10,000 MTCO<sub>2</sub>e mandatory reporting threshold compared to Alternative 1 No Action.”<sup>16</sup>*

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- **Air pollution:** Mitigation for air pollution impacts on an increased population must lead to design safeguards and changes regarding the ways industry operates in close proximity to neighbors.

*“Depending on the transportation routes that are used, emissions of air pollutants from mobile sources could concentrate along routes that pass through vulnerable communities, leading to inequitable exposure to air pollution.”<sup>17</sup>*

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- **Displacement:** The description of risk of displacement does not reflect community concerns regarding displacement pressures and affordability.

*“Overall, parcels within the study area are at low or moderate risk for displacement.... While some loss of existing housing may be possible under this Alternative this is an expected part of a changing urban environment.”<sup>18</sup>*

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- Emphasis on affordable housing for moderate to very low-income residents

<sup>15</sup> Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.10, page 3-427

<sup>16</sup> Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.2, page 3-78

<sup>17</sup> Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.2, page 3-57

<sup>18</sup> Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.9, page 3-321

- Nevertheless, many of the locations proposed for UI zoning are limited for opportunities such as increased affordable housing while industrial and port operations receive the largest percent of protection under the proposal.

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- **Sea Level Rise and disregard for the Superfund impacts:** Impacts of sea level rise and additional threats of climate change must be taken more seriously throughout all mitigation areas.

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*“The Duwamish River and Longfellow Creek are each listed as an impaired water body for fecal coliform bacteria, temperature, pH, and dissolved oxygen. Water quality treatment at redevelopment sites will reduce fecal bacteria and other pollutant impacts at sites that redevelop. Significant portions of both Georgetown and South Park neighborhoods are susceptible to sea level rise and all Alternatives, including the No Action Alternative, would increase the concentration of people in these vulnerable areas. Compliance with requirements of the SMP and frequently flooded areas requirements at redevelopment sites, in addition to adaptation measures listed in the mitigation section, may help reduce vulnerability to sea level rise in some portions of the subarea.”<sup>19</sup>*

- **Fairness in zoning:** Increase mixed-use areas in Georgetown and South Park to allow for a larger percentage of community-driven anti-displacement efforts.

*“Alternative 4 would also strengthen protections for core industrial uses in the MML zone on approximately 87% of industrial lands”<sup>20</sup>*

97-20

Without binding legislation for mitigation measures and a year-long comprehensive community engagement process, we believe the Maritime and Industrial Strategy will uphold the systemic environmental exposure disparities experienced by the Duwamish Valley community for years to come. **We join the Georgetown Community Council (GCC) in their recommendation to send a companion binding legislation to the City Council that codifies and funds recommended mitigation measures.**

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#### V. ACT ON THE VISION AND ISSUES EXPRESSED IN THE COMMUNITY ADVISORY GROUP

In early 2020, Georgetown and South Park community members were invited by the City to discuss their vision and top issues for the Maritime and Industrial Strategy to address. This group strongly expressed the importance of including the elements of maintaining a diverse and vibrant community, environmental equity and pollution mitigation, healthy environment in communities and in industrial areas next to them, affordable housing, workforce development and housing, and job creation.

97-22

We believe the suggestions made by the community advisory group were not fully represented throughout all of the alternatives and the significant impacts predicted compromise current neighborhood goals related to the elimination of environmental and health inequities.

<sup>19</sup>Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.3, page 3-97

<sup>20</sup> Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Summary, page 1-4

In this way, the DEIS must consider an additional alternative that reflects all the priorities of the community for a fair consideration of proposed alternatives. We ask the City to include an additional alternative, alternative 5, that will mirror the realities of today for the future community, not industry, to believe in.

## VI. RECOMMENDATIONS OVERALL

- A. Commit to a continued community engagement process that reaches far into the diverse and multilingual communities of the Duwamish Valley for the next year and duration of this EIS to legislation.
- B. Expand buffers and UI areas to allow for more affordable housing in addition to increased allotted mixed-use zoning in favor of community over industry.
- C. Draft a companion binding legislation with community for the DEIS that (1) sets a commitment to mitigate all impacts caused under this plan and (2) enforces higher environmental standards for pollution control inclusive of cumulative impacts and related health outcomes.
- D. Increase credibility of data and include disaggregated in the DEIS.
- E. Slow down the DEIS process to allow for the initiatives on which it relies to mitigate impacts make significant headway to avoid undue harm.
- F. Address current issues around pollution, compliance, and enforcement for a healthier environment.
- G. Fold the DEIS process into the comprehensive plan update.

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cont.

## CONCLUSION

For decades, the Duwamish Valley has raised serious concerns with regards to industrial pollution, lack of green public space, affordable housing, noise disturbance, public safety and visible air pollution and more. In closing, the Industrial and Maritime Strategy must embody the Racial Equity Outcomes described in the Duwamish Valley Action plan, including equitable access to city resources, accountability and decision-making.<sup>21</sup> The community continues to wait for equitable safeguards from neighboring polluters while business as usual continues. This chronic issue must be addressed and land use change presents a unique opportunity to rezone more spaces for the community in order to restore environmental health and champion placekeeping, economic justice and resilience.

97-23

We strongly recommend the City of Seattle commit to frequent and authentic community engagement around land use in order to strengthen environmental standards for industrial neighbors before moving forward on a plan that protects industry over community for generations to come.

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<sup>21</sup> [http://greenspace.seattle.gov/wp-content/uploads/2018/06/DuwamishValleyActionPlan\\_June2018.pdf](http://greenspace.seattle.gov/wp-content/uploads/2018/06/DuwamishValleyActionPlan_June2018.pdf)

To address the long-lasting, cumulative impacts of pollution and systemic disinvestment in communities like the Duwamish Valley, it is essential for the City of Seattle to prioritize the recommendations of the Duwamish Valley community.

Sincerely,

Adrienne Hampton, Climate Policy Manager  
Duwamish River Community Coalition (DRCC)

Greg Ramirez, Chair  
Georgetown Community Council (GCC)

Erica Bush, Lead Organizer  
Duwamish Valley Safe Streets (DVSS)

Velma Veloria, Chair  
King County International Community Coalition (KCIACC)

Maria Ramirez, Chair  
Duwamish Valley Affordable Housing Coalition (DVAHC)



Holmes, Jim

**From:** Georgetown Merchants <info@georgetownseattle.org>  
**Sent:** Friday, April 15, 2022 4:57 PM  
**To:** Holmes, Jim; Wentlandt, Geoffrey  
**Cc:** Dawna Holloway; Sam Farrazaino; Michelle Harvey; Bennett Properties; John bennett; Anita Woo; Kerry Gates  
**Subject:** Comment on the Industrial & Maritime DEIS

CAUTION: External Email

Dear OPCD Team,

The Georgetown Merchants Association (GMA) would like to provide feedback on the City of Seattle’s Draft Environmental Impact Statement (DEIS) regarding the Industrial & Maritime Strategy. We also express our support and solidarity with the Georgetown Community Council, Duwamish River Community Coalition, the South Park Merchants Association, and many other community organizations, businesses, and individuals in their responses to the DEIS.

The DEIS and overall Strategy does not meet the needs and priorities of Georgetown residents, small businesses, and workers. This process was not conducted in an equitable way because the engagement process relied primarily on input from traditional stakeholders who have historically had access to power and influence. We advocate taking more time to authentically engage all of the stakeholders in this process. Further, we ask the city to integrate the Industrial and Maritime Strategy into the Comprehensive plan process. Maritime and industrial land comprises 12% of our city and should be taken into account as part of the whole.

98-1

We ask for more specific definition of the boundaries of the zoning and the specific mitigations that they would put in place to prevent displacement of businesses, industry, residents.

98-2

As part of further study, we ask the city to study intersections of the different individual impacts and mitigations. Individual study does not show the cumulative impact and cross-over impacts. We ask that the city consider systemic ramifications, instead of looking at siloed data.

98-3

Finally, we feel the DEIS falls short on understanding current public safety issues. The GMA would like to see more comprehensive look at public safety in the study. We ask that the city acknowledge current public safety issues in the neighborhoods affected. We further ask that commitments to public safety in the neighborhood as part of any changes made.

98-4

Thank you for the opportunity to comment.

Sincerely,  
 Sara Ann Davidson

Executive Director, Georgetown Merchants Association



**Holmes, Jim**

Letter #99

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**From:** Georgetown Youth Council <georgetownyouthcouncil@gmail.com>  
**Sent:** Friday, April 15, 2022 3:45 PM  
**To:** PCD\_Industry\_and\_Maritime@seattle.gov; Wentlandt, Geoffrey; Holmes, Jim  
**Cc:** Quirindongo, Rico; Harrell, Bruce; Harrell, Monisha; Burgess, Tim; McIntyre, Markham; Wong, Greg; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa; directors@georgetownneighborhood.com  
**Subject:** Georgetown DEIS Statement

**CAUTION: External Email**

Good afternoon,

My name is Jake Bookwalter. I am the co-president of the Georgetown Youth Council. Our organization fully supports the comment letter from the Georgetown Community Council and we urge you to fold the DEIS process into the Comprehensive Plan update. We agree with all the concerns they've outlined.

99-1

Thank you,  
Jake Bookwalter

**Holmes, Jim**

Letter #100

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**From:** Seattle Bicycle Advisory Board <sbabsecretary@gmail.com>  
**Sent:** Sunday, April 10, 2022 7:50 PM  
**To:** Holmes, Jim  
**Cc:** Harrell, Bruce; LEG\_CouncilMembers  
**Subject:** SBAB comment on Industrial and Maritime Strategy  
**Attachments:** SBAB\_Comment on Seattle Maritime and Industrial Strategy\_2022-04-10.pdf

**CAUTION: External Email**

Dear Jim Holmes and project team,

Thank you for presenting the Industrial & Maritime Strategy to the Seattle Bicycle Advisory Board in March. On behalf of the Bicycle Advisory Board, I've attached a letter of comment with our feedback on the strategy.

Thank you,  
The Seattle Bicycle Advisory Board



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.

100-1

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.

100-2

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*.

100-3

Patrick Taylor, Co-Chair  
Sarah Udelhofen, Co-Chair  
Kashina Groves, Co Vice-Chair  
Andrea Lai, Secretary  
Yasir Alfarag  
Andrew Dannenberg  
Meredith Hall  
Jose Nino  
Douglas Migden  
Maimoona Rahim  
Yacoov Tarko  
Diane Walsh

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



Patrick Taylor, Co-Chair  
Sarah Udelhofen, Co-Chair  
Kashina Groves, Co Vice-Chair  
Andrea Lai, Secretary  
Yasir Alfarag  
Andrew Dannenberg  
Meredith Hall  
Jose Nino  
Douglas Migden  
Maimoona Rahim  
Yacoov Tarko  
Diane Walsh

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.

100-4

**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.

100-5

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 planing processes insofar as they relate to bicycling.

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.

100-6

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 –

100-7

- City Council  
Resolution 25534



Patrick Taylor, Co-Chair  
Sarah Udelhofen, Co-Chair  
Kashina Groves, Co Vice-Chair  
Andrea Lai, Secretary  
Yasir Alfarag  
Andrew Dannenberg  
Meredith Hall  
Jose Nino  
Douglas Migden  
Maimoona Rahim  
Yacoov Tarko  
Diane Walsh

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.

100-7  
cont.

**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.

100-8

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.**

100-9

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

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 planing processes insofar as they relate to bicycling.

- City Council  
Resolution 25534

**Holmes, Jim**

Letter #101

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**From:** South Park <spnaseattle@gmail.com>  
**Sent:** Thursday, April 14, 2022 9:19 AM  
**To:** Holmes, Jim  
**Subject:** comment letter DEIS  
**Attachments:** SPNA comment letter DEIS 2022.pdf

**CAUTION: External Email**

Good morning, Jim  
Attached please find a comment letter on the Draft Environmental Impact Statement for Industrial and Maritime lands, from SPNA and community.  
Thank you for this opportunity.  
Best,  
Robin Schwartz  
South Park Neighborhood Association (SPNA)  
8201 10th Ave. S.  
Seattle, WA 98108

April 14, 2022

City of Seattle

Office of Planning and Community Development

Attention: Industrial and Maritime Strategy Draft Environmental Impact Statement

Dear OPCD:

As the Board of Directors of the South Park Neighborhood Association, we acknowledge this opportunity to comment on the Draft EIS. Along with other local organizations including the Georgetown Community Council and the Duwamish River Community Coalition, we feel obligated to resist the urge to meet the arbitrary comment deadline of March 2, 2022.

We do not believe the City is operating in good faith by releasing a very long and very technical document, in English only and with a very limited amount of outreach and requesting feedback within 30-75 days. If the City truly values input made by community members in the Duwamish Valley (as it has repeatedly claimed in recent years), then this process must be completely overhauled. Community members deserve a significant extension to the comment period (we suggest at least one year), including funding and a plan of action to inform and educate residents about the DEIS, the proposed changes, what they may mean to us, and how to comment effectively. This outreach must be accessible to non-native English speakers.

We will not engage in the current feedback process as it is not functionally accessible to us or to our community. We urge you to reverse the process, re-evaluate, and engage in authentic outreach so that our community is given the opportunity to affect our future in equal measure to policy-makers, bureaucrats, and industry.

Regards,

SPNA Board of Directors

*ADDENDUM: this letter was written prior to the extension of the comment deadline. While the specifics of this letter are slightly outdated, the general points remain: the process is too short, too rushed and lacking authentic and useful outreach. Case in point: we will not have time to attend the outreach events, re-write this letter, and approve it by vote. Therefore, we submit this letter as it supports our input, which remains that we do not have sufficient time or information to participate coherently in this process.*

Regards, SPNA Board of Directors and members:

Susan Harris

Jessica Staire

Stephanie Pena

Fern Lester

Cedar Bushue

Robin Schwartz

Penni Cocking, founder, Duwamish Valley Neighborhood Preservation Coalition

Cote Soerens, Executive Director, Cultivate South Park

Rebekah Barton

Harold Baldwin

Betsy McFeely

Heather Griffin

Daniel Diggs

Bill Pease

Robert Hanlon



**From:** Cari Simson <cari@urbansystemsdesign.com>  
**Sent:** Friday, April 15, 2022 4:52 PM  
**To:** Holmes, Jim; geoffrey.wentland@seattle.gov; Harrell, Bruce  
**Subject:** Comments: Industrial and Maritime Strategy

**CAUTION: External Email**

Dear Mayor Harrell, Jim Holmes, and Geoffrey Wentlandt,

While the DEIS and Strategy make welcome adjustments to zoning practices and move a small pocket of land out of the Duwamish Manufacturing Industrial Center (MIC), these changes are ultimately marginal. The DEIS and overall Strategy fall significantly short of meeting the needs and priorities of Georgetown and South Park residents, small businesses, and workers.

\*Privileges future growth of industrial and maritime usages over actual creative industries proven to support and sustain local businesses; the consequences could mean the end of Seattle’s legacy as an art and cultural center

102-1

\* Insufficient study of impacts on existing vital arts and culture resources in the district

\*All alternatives reduce or eliminate potential affordable housing

\*Shows lack of consideration towards existing communities, families, and small business

\*Threatens the future of core working art space which could sorely limit intrinsic creative resources

● We are glad to see the updated zoning concepts put forward by OPCD. In particular, we believe the Urban Industrial (UI) zoning has the potential for increased affordability, sustainability, and equitable outcomes if pursued and implemented well by the City. It also offers potential opportunities for more connectivity and better protections between the residential and heavy industrial areas of our neighborhood.

However, the areas of Georgetown that are zoned UI in the DEIS will make no material changes to the lives of neighborhood residents and small businesses for the foreseeable future. The vast majority of land that is zoned UI is owned by organizations that likely have no intention to sell - now or in the future. Examples include (in Alternatives Two and Four):

- Land along Ellis Ave that is owned by King County (Boeing Field), which may actually pursue expansion into the residential areas in the coming years; and
- Land along Corson Ave that is owned by the Washington State Department of Transportation, South Seattle College, and the Puget Sound Industrial Excellence Center.

102-2

● At its most ambitious (Alternative Four), the DEIS still zones 87 percent of industrial land as MML, which represents only a three percent adjustment from current zoning. Lands zoned as MML cannot accommodate new affordable housing which, as the City knows, Georgetown and South Park stakeholders identified as a top issue that must be addressed in the Industrial & Maritime Strategy. These lands also allow the continued proliferation of heavy industry, which has an outsize impact on resident health outcomes and quality of life.

While the City claims that UI zoning can create more substantive buffers between Georgetown residents and heavy industry - a longtime request of the neighborhood - the choice of locations for the UI zoned areas are nominal. In addition, there are other zoning options that the City does not allow residents to consider - like Commercial 2 - that would create functional buffer zones between residents and heavy industry AND

more accurately capture what is already happening in the area than Maritime, Manufacturing, and Logistics (MML), UI, or Industry and Innovation (II) zoning.

For these reasons, the GCC calls on the City to fold the DEIS process into the Comprehensive Plan update, which is just beginning. There is an opportunity to make these issues accessible and compelling for residents across impacted communities. That approach must center language access, meeting people where they are, and community co-design.

This approach aligns with the timing of the robust engagement plan proposed for the Comprehensive Plan update. It would allow the Industrial & Maritime Strategy to get the attention from the City and community that it deserves by being included in OPCD's well-designed community outreach strategy.

Working together, we can create a holistic, sustainable, and community-driven industrial lands strategy that makes a real and lasting difference in entrenched challenges of affordability, environmental impacts, and equity across Seattle. The GCC remains ready to support these efforts.

### **What should be done**

I call on the City Council and the Mayor's office to set aside the deeply flawed "Industrial and Maritime Strategy" which is outlined in the Draft Environmental Impact Statement and begin a serious attempt to bring Georgetown and South Park into the city's comprehensive plan instead of the piecemeal zoning attack outlined. What is missing in the IMS is a sincere regard for the future of our city's cultural life and how we as a city plan to support affordable housing for the working artists, artisans, small businesses and the voice of workers in general.

Under the guise of promising jobs and or augmenting environmental sustainability, something else is threatened to be plowed under: the artists, their studios, and the cultural life of Seattle.

As the overview provided by the Duwamish River Community Coalition points out: *All alternatives have the potential to affect the known and unknown historic, archaeological, and cultural resources in the Georgetown/South Park Subarea.* This is unacceptable. Housing would be diminished and market forces which are currently difficult enough would increase if these zoning measures are allowed to pass into law.

Mayor Harrell, please help us go back to the drawing board.

### **Art, not condos!**

The failures of the Industrial and Marine Report which led to this rezoning proposal were prompted by the Jenny Durkan administration and begin at the outset. Even though the first page of the IMS states plainly that industrial growth is flat while food and beverage (entertainment and arts) are much higher and represents growth for our city, the report seems to think we won't believe the city's own words or our eyes.

There obviously has been no attempt to document or study the art and cultural life that springs from this district. For example, a monthly event called the Georgetown Art Attack brings growing numbers to the district to shop, eat, and listen to music while enjoying dynamic interactions with working artists. In the Equinox studio complex alone, 175 plus members are visited each month by hundreds of citizens interested in art, craft, and music.

Where is a mention of Seattle artists in this strategy or the recognition that this district may be the last real option to house, stage and promote the city's artists? Sadly, many artists have already fled the rising cost of housing and lack of cultural space in Seattle, important BIPOC and low-income individuals who could no longer face down just the kind of indifference proposed here. Georgetown provides a real opportunity to stop the creative brain drain rather than cede territory to a homogenized city of work, industry and ever duller existence.

I am a small business consultant and artist who is a member of Equinox Studios located at the southwest corner of Georgetown, the largest contiguous art complex in the Pacific Northwest. I have been a part of many art and music communities in my lifetime (see Capitol Hill for example) and have watched them fall one by one to development and society's indifference to cultural values.

When I moved to Seattle in 1995, our city was throbbing with art, music, and affordable cultural spaces. Today, all of those spaces have disappeared and the communities of musicians and many artists who thrived in our city have

102-3

102-4

102-5

moved on. While other parts of the city wave the flag of art from places where artists cannot afford to work or live, Georgetown is the last neighborhood to realistically support studio and performance space. You can't have artists without a room of their own. There is no great city without art and a thriving art scene. The Industrial and Maritime strategy puts art on the chopping block.

102-5  
cont.

Thank you for the opportunity to comment, and we look forward to the City's response.  
Cari

--

Cari Simson  
Urban Systems Design  
206-234-5102  
She/Her  
Black Lives Matter  
[Web](#) | [Facebook](#) | [instagram](#)

Holmes, Jim

Letter #103

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**From:** Michelle Benetua <Michelle@seattleparksfoundation.org>  
**Sent:** Friday, April 15, 2022 10:52 AM  
**To:** Holmes, Jim  
**Subject:** Automatic reply: Duwamish Valley Safe Streets Comment on Industrial and Maritime Strategy

CAUTION: External Email

Hello,

Thank you for your message. I am taking vacation time and will not be available until April 19th. Please contact Falisha Kurji with questions/concerns that cannot wait: [falisha@seattleparksfoundation.org](mailto:falisha@seattleparksfoundation.org)

103-1

Best,  
Michelle

Holmes, Jim

**From:** Emmett Bookwalter <emmett.bookwalter@gmail.com>  
**Sent:** Thursday, April 14, 2022 9:47 PM  
**To:** Harrell, Bruce; Wentlandt, Geoffrey; Wong, Greg; Holmes, Jim; McIntyre, Markham; Harrell, Monisha; Quirindongo, Rico; directors@georgetownneighborhood.com; Nelson, Sara; Mosqueda, Teresa; Burgess, Tim

CAUTION: External Email

Dear City of Seattle,

I am 15 years old and i've lived in Georgetown my whole life. I support the comment letter from the Georgetown Community Council and urge you to fold the DEIS process into the Comprehensive Plan update.

104-1

Thanks,

Emmett Bookwalter

Holmes, Jim

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**From:** Melissa Bookwalter <melissa.bookwalter@gmail.com>  
**Sent:** Thursday, April 14, 2022 9:32 PM  
**To:** Wentlandt, Geoffrey; Holmes, Jim  
**Cc:** Harrell, Bruce; Wong, Greg; McIntyre, Markham; Harrell, Monisha; Quirindongo, Rico; directors@georgetownneighborhood.com; Nelson, Sara; Mosqueda, Teresa; Burgess, Tim  
**Subject:** City's industrial maritime zoning strategy

CAUTION: External Email

Dear City of Seattle,

I live in Georgetown and I love my community and Seattle. I support the comment letter from the Georgetown Community Council and urge you to fold the DEIS process into the Comprehensive Plan update.

105-1

Thanks,

Melissa Bookwalter

Holmes, Jim

Letter #106

**From:** Cedar Bushue <cedar.bushue92@gmail.com>  
**Sent:** Monday, April 11, 2022 3:55 PM  
**To:** Holmes, Jim  
**Subject:** Re: RAM Mounts and Jorgensen Forge

**CAUTION: External Email**

Ram Mounts/National Products Inc also does business with Russia. I wasn't sure how to best broach this with you in the city meeting, but could lead to a conflict of interest if a war does break out with Russia. For proof, I will send along info; <https://www.rammount.com/partners/> Go to the site, click the international tab and go down to RAM Baltic, and it has Russia listed as a place they do business with as "Exclusive Partners."

106-1

On Sun, Apr 10, 2022 at 5:56 PM Cedar Bushue <[cedar.bushue92@gmail.com](mailto:cedar.bushue92@gmail.com)> wrote:

As you know, I talked a bit about RAM Mounts and the Toxic industrial companies in the area. RAM Mounts/National Products Incorporated, being the one smack-dab in the middle of the residential area. While toxic industrials are not known for their morals, there is a certain amount of decorum that is expected of everyone in society. RAM Mounts/NPI is on Elmgrove and on Dallas Ave in my neighborhood. On Elmgrove, when I worked there, we had little to no safety regulations. I ended up having to be hospitalized due to fume exposure. No mandatory masks, inadequate earplugs, (those ones that fall out on the 4th of July), no mandatory eye protection either. Ear injuries and lung problems are common for workers in Powdercoat. Lung and other health issues are prevalent in the neighborhood from the fumes put out by RAM and other toxic companies in the area. There was the argument made at the Maritime EIS meetings that cars are the biggest source of pollution in the area. Even if we all stopped driving in the area, the toxin output by the industrial companies would still be very harmful to both us, and to the river, which is already a superfund site. The smells coming from the facilities belonging to RAM smells of burning plastic, even on the outside, where bay doors are opened all day to vent fumes out in the neighborhood. The city has talked about doing something as far as Global Warming and Climate Change. Until we address the companies that are pumping out constant fumes, nothing will change on this. Doing something about these companies would also give the presentation that the city is trying to keep fumes down, so drivers and public transport may be more willing to change as well. As far as Jorgensen Forge goes as well, Ecology needs to just clean up the area and to give a presentation on the area, as well as extend the comment period. We are tired of such organizations (City, Port, EPA, County, etc.) either ignoring the community due to the low-income/marginalized neighborhoods that are Georgetown and South Park, ow just dumping all of the industrial companies no one else wants without either properly compensating the locals or doing fume mitigation, which makes this whole area a 'sacrifice zone.'

106-2

## Holmes, Jim

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**From:** Cedar Bushue <cedar.bushue92@gmail.com>  
**Sent:** Sunday, April 10, 2022 5:57 PM  
**To:** Holmes, Jim  
**Subject:** RAM Mounts and Jorgensen Forge

**CAUTION: External Email**

As you know, I talked a bit about RAM Mounts and the Toxic industrial companies in the area. RAM Mounts/National Products Incorporated, being the one smack-dab in the middle of the residential area. While toxic industrials are not known for their morals, there is a certain amount of decorum that is expected of everyone in society. RAM Mounts/NPI is on Elmgrove and on Dallas Ave in my neighborhood. On Elmgrove, when I worked there, we had little to no safety regulations. I ended up having to be hospitalized due to fume exposure. No mandatory masks, inadequate earplugs, (those ones that fall out on the 4th of July), no mandatory eye protection either. Ear injuries and lung problems are common for workers in Powdercoat. Lung and other health issues are prevalent in the neighborhood from the fumes put out by RAM and other toxic companies in the area. There was the argument made at the Maritime EIS meetings that cars are the biggest source of pollution in the area. Even if we all stopped driving in the area, the toxin output by the industrial companies would still be very harmful to both us, and to the river, which is already a superfund site. The smells coming from the facilities belonging to RAM smells of burning plastic, even on the outside, where bay doors are opened all day to vent fumes out in the neighborhood. The city has talked about doing something as far as Global Warming and Climate Change. Until we address the companies that are pumping out constant fumes, nothing will change on this. Doing something about these companies would also give the presentation that the city is trying to keep fumes down, so drivers and public transport may be more willing to change as well. As far as Jorgensen Forge goes as well, Ecology needs to just clean up the area and to give a presentation on the area, as well as extend the comment period. We are tired of such organizations (City, Port, EPA, County, etc.) either ignoring the community due to the low-income/marginalized neighborhoods that are Georgetown and South Park, ow just dumping all of the industrial companies no one else wants without either properly compensating the locals or doing fume mitigation, which makes this whole area a 'sacrifice zone.'

106-3



Holmes, Jim

**From:** Karen Paola Carpenter <carpenter.kp@gmail.com>  
**Sent:** Friday, April 15, 2022 3:14 PM  
**To:** Wentlandt, Geoffrey; Holmes, Jim; info@georgetownseattle.org  
**Subject:** Comment on the Industrial & Maritime DEIS

**CAUTION: External Email**

Good afternoon:

I am a West Seattle resident who frequently visits friends and patronizes businesses in the Georgetown community. I join the below letter from the Georgetown Community Council in calling for a decrease in MML zoning and increase in substantive buffers between Georgetown residents and heavy industry.

I join the call to update the following areas from MML to zoning that does not allow heavy industry to proliferate, including UI, Mixed Use and/or Commercial:

1. The entire area from Orcas St. to E Marginal Way and Corson Ave to 1st Ave S;
2. The Corson Building and Elysian Brewing located at the intersection of Airport Way S and Corson Ave S and Airport Way S and S Lucille St, respectively; and
3. Extend buffer zoning (UI, Commercial, or Mixed Use) along Airport Way S all the way to S Lucille St AND extend buffer zoning to the other side of Airport Way S all the way to the railroad. Current Mixed Use zoning proposals under Alternatives 2 and 4 only include one side of Airport Way S.
  1. Along the added side of Airport Way S, consider UI so it preserves artist studios and allows for light industrial uses.

107-1

Furthermore, I join the call for the City to send binding legislation to the city council along with the final EIS in order to codify and fund the recommended measures that center affordability and equity in zoning changes. Examples include commitments to affordable housing and historic preservation.

Finally, I join the call for the City to move the DEIS process into the Comprehensive Plan update in order to more equitably gather input from all impacted communities, not just traditional stakeholders. Doing so, would more accurately align the City's understanding of Georgetown with the reality Georgetown residents, workers and business well know.

Thank you,

Karen Paola Carpenter

See Letter #96

Dear OPCD Team

The Georgetown Community Council (GCC) is writing to provide our feedback on the City of Seattle's Draft Environmental Impact Statement (DEIS) regarding the Industrial & Maritime Strategy. While the DEIS and Strategy make welcome adjustments to zoning practices and move a small pocket of land out of the Duwamish Manufacturing Industrial Center (MIC), these changes are ultimately marginal. The DEIS and overall Strategy fall significantly short of meeting the needs and priorities of Georgetown residents, small businesses, and workers.

The GCC's comments are as follows:

- We are glad to see the updated zoning concepts put forward by OPCD. In particular, we believe the Urban Industrial (UI) zoning has the potential for increased affordability, sustainability, and equitable outcomes if pursued and implemented well by the City. It also offers potential opportunities for more connectivity and better protections between the residential and heavy industrial areas of our neighborhood.

**However, the areas of Georgetown that are zoned UI in the DEIS will make no material changes to the lives of neighborhood residents and small businesses for the foreseeable future.** The vast majority of land that is zoned UI is owned by organizations that likely have no intention to sell - now or in the future. Examples include (in Alternatives Two and Four):

- Land along Ellis Ave that is owned by King County (Boeing Field), which may actually pursue expansion into the residential areas in the coming years; and
- Land along Corson Ave that is owned by the Washington State Department of Transportation, South Seattle College, and the Puget Sound Industrial Excellence Center.

While the City claims that UI zoning can create more substantive buffers between Georgetown residents and heavy industry - a longtime request of the neighborhood - the choice of locations for the UI zoned areas are nominal. **In addition, there are other zoning options that the City does not allow residents to consider - like Commercial 2 - that would create functional buffer zones between residents and heavy industry AND more accurately capture what is already happening in the area than Maritime, Manufacturing, and Logistics (MML), UI, or Industry and Innovation (II) zoning.**

It is also worth noting that a significant amount of land that is currently zoned Commercial 2 in the neighborhood - surrounding the Airport Way S and S Hardy St intersection - is industrial in practice due to its use by or proximity to Boeing Field. Historically, when industry encroaches on residential and commercial spaces, the loss of non-industrial land is not made up for elsewhere. This practice must end. For this reason, it's crucial that the City study additional expansion of buffer zoning - including C2 and Mixed Use - throughout the neighborhood to mitigate against likely future losses in non-industrial land.

We wish to connect the entire neighborhood, not just the "Triangle" along Airport Way S between Corson Ave S and S Bailey St. The DEIS alternatives are effectively incomplete because they do not study the impacts of additional types of zoning other than the three put forward by OPCD. **We urge the City to create legitimate buffer zones between residences and heavy industry by extending the UI zones currently proposed in Alternatives Two and Four and by studying the impacts of other, non-industrial types of zoning. Fundamentally, Georgetown residents are looking for a decrease in MML zoning, as it creates adverse impacts to our health and quality of life.**

- At its most ambitious (Alternative Four), the DEIS still zones 87 percent of industrial land as MML, which represents only a three percent adjustment from current zoning. Lands zoned as MML cannot accommodate new affordable housing which, as the City knows, Georgetown and South Park stakeholders identified as a top issue that must be addressed in the Industrial & Maritime Strategy. These lands also allow the continued proliferation of heavy industry, which has an outsize impact on resident health outcomes and quality of life.

**Frustratingly, the City's understanding of Georgetown continues to be completely out of sync with the reality on the ground. Much of the land the City has zoned as MML has - in reality - been full of mixed uses for decades.** For this reason, we ask that the City study updating the following areas from MML to zoning that does not allow heavy industry to proliferate, including UI, Mixed Use, and/or Commercial:

1. The entire area from Orcas St. to E Marginal Way and Corson Ave to 1st Ave S;
2. The Corson Building and Elysian Brewing located at the intersection of Airport Way S and Corson Ave S and Airport Way S and S Lucille St, respectively; and
3. Extend buffer zoning (UI, Commercial, or Mixed Use) along Airport Way S all the way to S Lucille St AND extend buffer zoning to the other side of Airport Way S all the way to the railroad. Current Mixed Use zoning proposals under Alternatives 2 and 4 only include one side of Airport Way S.
  - a. Along the added side of Airport Way S, consider UI so it preserves artist studios and allows for light industrial uses.

This is not a radical shift in industrial and maritime zoning practices. **It is simply truing up the zoning to reflect the reality of our neighbors who already live and conduct business there.** In addition, this would create a meaningful buffer zone between our residential areas, thriving commercial core, and heavy industry. This would also allow for more housing and more investment in the kinds of maker and artist studios that Georgetown prides itself on.

- A fundamental flaw of the DEIS process is that the accompanying mitigation measures are merely suggestions, and will not be put forward as binding legislation eventually passed by the City Council. **This means that impacted residents citywide are forced by the City to make decisions that will have substantive and lasting impacts on their health and wellbeing without any commitment from the City to solve those issues.** The City - when issuing the Final EIS - must send companion binding legislation to the City Council that codifies and funds recommended mitigation measures.

- The DEIS makes zoning changes that need accompanying policy commitments in order to maximize their impact. **For example, rezoning part of Airport Way from Industrial to Mixed Use has lots of potential benefits for the neighborhood. However, it requires accompanying policies from the City - such as commitments regarding historic preservation and affordable housing - to ensure the zoning changes align with the policy intent of the neighborhood, and don't exacerbate affordability and equity issues.** The City - when issuing the Final EIS - must send companion binding legislation to the City Council that codifies and funds policy commitments that center affordability and equity alongside zoning changes.
- While we appreciate OPCD's recent work to come into our communities and talk directly with our impacted neighbors, overall, the engagement process for both the Industrial & Maritime Strategy and the DEIS has been deeply inadequate. **The policies being proposed and studied in the Strategy and DEIS impact every single resident, small business, and worker in and around the industrially zoned areas. However, the engagement process relied primarily on input from traditional stakeholders who have historically had access to power and influence.** The GCC supports the Duwamish River Community Coalition's request for a year-long extension to the DEIS to allow for meaningful engagement with impacted residents.

**For these reasons, the GCC calls on the City to fold the DEIS process into the Comprehensive Plan update, which is just beginning. There is an opportunity to make these issues accessible and compelling for residents across impacted communities. That approach must center language access, meeting people where they are, and community co-design.**

This approach aligns with the timing of the robust engagement plan proposed for the Comprehensive Plan update. It would allow the Industrial & Maritime Strategy to get the attention from the City and community that it deserves by being included in OPCD's well-designed community outreach strategy.

Working together, we can create a holistic, sustainable, and community-driven industrial lands strategy that makes a real and lasting difference in entrenched challenges of affordability, environmental impacts, and equity across Seattle. The GCC remains ready to support these efforts.

Thank you for the opportunity to comment, and we look forward to the City's response.

Sincerely,  
Georgetown Community Council

Holmes, Jim

Letter #108

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**From:** Jo Claxton <msjoclaxton@gmail.com>  
**Sent:** Friday, April 15, 2022 9:12 AM  
**To:** PCD\_Industry\_and\_Maritime@seattle.gov; Wentlandt, Geoffrey; Holmes, Jim  
**Cc:** Harrell, Bruce; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa; Burgess, Tim; directors@georgetownneighborhood.com; McIntyre, Markham; Harrell, Monisha; Wong, Greg; Quirindongo, Rico  
**Subject:** Industrial and Maritime Zoning Plans re. Georgetown

**CAUTION: External Email**

Hello,  
I am a Georgetown resident and have been following the zoning proposals shared with us and I attended one of the outreach meetings held in Georgetown recently.

From what I have seen, there does not seem like enough changes to discourage heavy industry, or to encourage more housing density and a healthier living environment for current residents. Our housing crisis along with the climate crisis outweighs economic growth - I feel there needs to be much more forward thinking regarding zoning for Seattle overall.

108-1

I support the comment letter from the Georgetown Community Council and urge you to fold the DEIS process into the Comprehensive Plan update.

Thank you,  
Joanne Claxton  
Ellis Ave S resident.

**From:** Penni Cocking <dvnpcollection@gmail.com>  
**Sent:** Friday, April 15, 2022 3:03 AM  
**To:** Holmes, Jim  
**Subject:** Industrial & Maritime DEIS re South Park

CAUTION: External Email

April 15, 2022  
Duwamish Valley Neighborhood Preservation Coalition

Seattle Office of Planning and Community Development  
To:  
Mr. Jim Holmes,

Re: Comment on DEIS for the Seattle Industrial and Maritime Strategy Plan

Thank you for the opportunity to meet with you at the South Park Library on March 31, 2022. We appreciated the information and explanations you provided to us on the Industrial and Maritime Plan DEIS.

We have the following observations about the plan which we think the City should take into consideration.

First, we think the City should include the DEIS process with the upcoming Seattle Comprehensive Plan update which is now beginning. We do not believe it should be separate. We also think that King County and the City of Tukwila, both adjacent to and part of the South Park business and residential areas, should be included in the planning process. It does not appear that they have been. The plan should be looked at with respect to coordinating the "big picture" which is to realize preservation of the South Park green environment so that a satisfactory result occurs for all who share the Duwamish River shore and floodplain...residents and business of retail, neighborhood and industrial/manufacturing, fishermen, cultural heritage/history, freight/transport and all.

109-1

According to Washington State GMA, planning together among joining jurisdictions is required. We also understand that there is an active annexation going on of the King County 'silver' area of the North Highline Unincorporated KC property into Seattle. How does the county property fit into the Seattle M&I Plan Strategy? Also, the Port of Seattle's affiliation with this plan is unclear and we have questions about that. We are wondering what the big picture looks like when it is put together among all involved?

109-2

It is disappointing that residents of South Park have waited for many years to have solutions to our concerns about industrial land use impacts due to decades of poor planning of our community by Seattle and other jurisdictions not addressed in this plan. This Plan's name gives the impression that the whole of impacts of industrial land uses will be its focus. From that we expected the 'Plan' to hone in on impacts we already have unfairly endured because we were dismissed in favor of industrialists' actions against our welfare. That is environmental racism in its most violent form. We have struggled to endure. We have fought back against extreme juxtaposition of least harmful residential zones right up against most harmful IG zones for over 100 years. Must we remind you of what Seattle has already done to its most precious Duwamish River, its shore and floodplain? In this study and assessment we see toxic ground water monitoring wells in abundance yet this 'Plan' does nothing to help alleviate the toxic activities of industry and its encroachment into the healthier residential yards where homes exist. We were told the M and I Plan Strategy is not part of the GMA Comp Plan for Seattle but we agree with Georgetown's request for it to be included. The options or Plan choices offered leave a lot to be desired.

109-3

We feel that actual experience told by South Park Residents living right next to industrial IG zones would show a more accurate story. Such experiences have also been left out.

Work experiences by industrial workers are also missing in this study. We have recently partnered with earth and social scientists to bring awareness of the truth that the City and others have not recognized as their culpability in demoralizing and poisoning real lives in the Duwamish River Valley. We are practical and want results. This Maritime and Industrial draft study of the Plan doesn't plan for us, the residents. To add to the insult we have felt for many, many years as residential property owners and residents in South Park (stakeholders) we read in the 'Plan' that if housing goals aren't met by the City in its upcoming Comprehensive Plan that more dense building will not take the industrially zoned land but more density will be shoved into nearby urban villages to satisfy Seattle's housing goals. South Park is not an Urban Village. Although it has been given the designation in the 1990's only because we in South Park wanted to protect our residential Single Family RS zone from industrial takeover. How ironic that context of what really happened back then was not realized when OPCD discovered they could shove density into places with the Urban Village name. No one at OPCD questioned why the entire South Park Residential neighborhood was a Residential Urban Village. This is highly unusual for nearly all the other Seattle Urban Villages as they are designated around a retail/transit core where apartments are built and the impact of close buildings are in the 'village'. Our special Residential UV should have been a red flag for the OPCD planners if proper study of South Park's history of poor zoning practices by those imposing only their wishes on us...industrial interests over residential. That is truly stealing our self determination and the intent of years of consistent South Park neighborhood plans saying how much we rely on the single family RS5000 zone.

109-4

The experiences of Ballard and Interbay areas are not the same as what the South Park community, especially, has had to and is facing daily due to decisions made for South Park that did not include impacts to residents by industrial actions. Georgetown is lumped together with us too called our shared subarea. Each community faces different impacts and is different. Georgetown is not a Residential Urban Village. Why are we...? We know what we thought back in the 1990's that has not provided protection today. South Park has most IG zones and one or two buffer areas. That is not a very good record and attests to the poorest land use planning of the entire region. Sadly this 'Plan' does nothing to improve our plight.

109-5

Second, we think there should be EMPHASIS on keeping the South Park residential area "green" to help mitigate the air quality and pollution here and there should also be attention to this in the surrounding industrial areas as well. Improper zoning has put a once farm rich South Park community in a vortex of poisoned air, land, habitat, and industrialist/development. Although it is not part of the Industrial Marine plan to deal with adjacent residential areas, IT SHOULD BE because THESE ARE THE REAL IMPACTS WE KNOW. Of course we hope you really want to know our story and we ask to be included in a more inclusive PLAN. We also see that if for some insidious reason you may want to think South Park actually is an Urban Village then how convenient a motivation for you to shove more inappropriate dense housing into our green yards; that is the ones still surviving the onslaught of illegal building in the guise of RSL at this time. We sent the City our letter as well as you, Jim, about the buildings being permitted in South Park which no one in the permitting office understands are being built on too small a lot for RSL.

109-6

We also think some of the industrial pollution issues can be dealt with by CORRECTING EXISTING ZONE DESIGNATIONS in the RESIDENTIAL area: (1) Remove Residential Urban Village status for South Park, Return to RS 5000 and include owner-occupied property be a must when making DADU or ADU on the property, and (2) do not allow Residential Small Lot zoning in South Park in order to avoid overbuilding on the already existing small lots here, As mentioned, we have already contacted the City of Seattle and shared our letter with you about this issue, but have not yet heard back from anyone.

109-7

(3), We are concerned about the proposed buffer zones between the industrial areas and residential areas. Residents of South Park can tell you that we already endure the reality of this because we have IG zoning next door to Residential zoning. Industrial zones bring in toxins and are magnets for crime, drugs, and prostitution. We don't want to encourage more of this and are somewhat concerned about the Manufacturing, Maritime and Logistics, Urban Industrial, and Industrial Innovation zoning as buffers. Perhaps a more substantive buffer like Commercial 2 might be more effective for a transition between heavy industry and residential areas. Yet the City has failed to monitor any and all adverse

109-8

activity in the IG zones already. It was the people of South Park (Residents) that got Long Painting to move and they were allowed to operate in a buffer zone with 24 hr sandblast booths less than 10 feet away from where children lived. Yes the permit Department turned a blind eye to their illegal industrial practices. It does so today in many ways. We surely shouldn't have to monitor the developers and industrial neighbors but that is what it boils down to.

109-9

We suspect the City or County or any jurisdiction doesn't want to lose any IG zoning. This is a conundrum South Park has suffered without solution or proper monitoring of industrial/manufacturing zones. One can't expect workers to monitor industrial spills without oversight and enforcement that you (City, etc.) have failed to do. What planet of dreamers did the planners of this option come from? No one wants to live in the already spoiled lands of decades of industrial use. In order for 'urban industrial' to work, extensive testing and cleanup of buildings (reused) and land will need to be done. Environment and habitat will have to be healed through planting native plants and trees. South Park has been allowed to be poisoned along with the Duwamish River yet after 25 years of 'clean up' the River continues to be a Superfund site. Much has been ruined due to extensive dredging without natural soil and geology left to heal in optimum outcome. It is a shame.

109-10

So listen up Seattle...pay attention to the total environment. Pay attention to the residential lands in the midst of the brownfields and poisons in South Park and treasure the RS 5000 lands you have sacrificed with inappropriate density and MHA rezone schemes. You should be protecting the RS5000 properties in South Park and valuing them for their mitigation of the detrimental IG zones surrounding the yards and old homes in RS 5000.

109-11

Actions speak louder than your plan...look back at what you have already done to the South Park neighborhood because that will tell you everything you need to know about what doesn't and does work. Please stop trying to impose the 'grand bargain' into our land that wasn't broken. Stop trying to sacrifice South Park for new development either industrial or dense residential.

South Park is the very last place to be considered for new 'affordable housing' construction. Naturally occurring more affordable home ownerships that do not destroy the small town historic character of South Park should be encouraged. Why does everyone want to shove new affordable homes into an already affordable neighborhood? We need our green yards, old neat houses and the healing of native plants/trees in abundance; not anything else. Green is not gotten from industrial money or new development because that destroys the real green we need in the river shore and land. We comment in support of the Duwamish River and River Lands where we call our home. Cultural deposits are in abundance under the arable soils where our homes sit. The River has deposited 10 feet or more of top soil in the River Floodplain for years and uncounted years. Our old houses sit in undisturbed yards of the most beautiful garden soil you could ever find.

109-12

South Park is the birthplace of the Pike Place Market where the best produce was grown.  
Thank you for the opportunity to comment.

Penni Cocking  
Duwamish Valley Neighborhood  
Preservation Coalition

#9

Letter #110

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, April 15, 2022 4:28:05 PM  
**Last Modified:** Friday, April 15, 2022 4:29:30 PM  
**Time Spent:** 00:01:24  
**IP Address:** 107.77.205.103

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Page 1: Draft EIS Comment



Q1

After reviewing the Draft EIS, send us a comment to suggest how the analysis can be improved or any other concern or question you may have related to the Draft EIS.

Subject Line: Comment on the Industrial & Maritime DEIS

Dear OPCD Team,

We are writing to provide our feedback on the City of Seattle's Draft Environmental Impact Statement (DEIS) regarding the Industrial & Maritime Strategy. While the DEIS and Strategy make welcome adjustments to zoning practices and move a small pocket of land out of the Duwamish Manufacturing Industrial Center (MIC), these changes are ultimately marginal. The DEIS and overall Strategy fall significantly short of meeting the needs and priorities of Georgetown residents, small businesses, and workers.

Comments are as follows:

• We are glad to see the updated zoning concepts put forward by OPCD. In particular, we believe the Urban Industrial (UI) zoning has the potential for increased affordability, sustainability, and equitable outcomes if pursued and implemented well by the City. It also offers potential opportunities for more connectivity and better protections between the residential and heavy industrial areas of our neighborhood. 110-1

However, the areas of Georgetown that are zoned UI in the DEIS will make no material changes to the lives of neighborhood residents and small businesses for the foreseeable future. The vast majority of land that is zoned UI is owned by organizations that likely have no intention to sell - now or in the future. Examples include (in Alternatives Two and Four): 110-2

- Land along Ellis Ave that is owned by King County (Boeing Field), which may actually pursue expansion into the residential areas in the coming years; and
- Land along Corson Ave that is owned by the Washington State Department of Transportation, South Seattle College, and the Puget Sound Industrial Excellence Center.

While the City claims that UI zoning can create more substantive buffers between Georgetown residents and heavy industry - a longtime request of the neighborhood - the choice of locations for the UI zoned areas are nominal. In addition, there are other zoning options that the City does not allow residents to consider - like Commercial 2 - that would create functional buffer zones between residents and heavy industry AND more accurately capture what is already happening in the area than Maritime, Manufacturing, and Logistics (MML), UI, or Industry and Innovation (II) zoning. 110-3

It is also worth noting that a significant amount of land that is currently zoned Commercial 2 in the neighborhood - surrounding the Airport Way S and S Hardy St intersection - is industrial in practice due to its use by or proximity to Boeing Field. Historically, when industry encroaches on residential and commercial spaces, the loss of non-industrial land is not made up for elsewhere. This practice must end. For this reason, it's crucial that the City study additional expansion of buffer zoning - including C2 and Mixed Use - throughout the neighborhood to mitigate against likely future losses in non-industrial land. 110-4

We wish to connect the entire neighborhood, not just the "Triangle" along Airport Way S between Corson Ave S and S Bailey St. The DEIS alternatives are effectively incomplete because they do not study the impacts of additional types of zoning other than the three put forward by OPCD. We urge the City to create legitimate buffer zones between residences and heavy industry by extending the UI zones currently proposed in Alternatives Two and Four and by studying the impacts of other, non-industrial types of zoning. Fundamentally, Georgetown residents are looking for a decrease in MML zoning, as it creates adverse impacts to our health and quality of life. 110-5

- At its most ambitious (Alternative Four), the DEIS still zones 87 percent of industrial land as MML, which represents only a three percent adjustment from current zoning. Lands zoned as MML cannot accommodate new affordable housing which, as the City knows, Georgetown and South Park stakeholders identified as a top issue that must be addressed in the Industrial & Maritime Strategy. These lands also allow the continued proliferation of heavy industry, which has an outsize impact on resident health outcomes and quality of 110-6

life.

Frustratingly, the City's understanding of Georgetown continues to be completely out of sync with the reality on the ground. Much of the land the City has zoned as MML has - in reality - been full of mixed uses for decades. For this reason, we ask that the City study updating the following areas from MML to zoning that does not allow heavy industry to proliferate, including UI, Mixed Use, and/or Commercial:

1. The entire area from Orcas St. to E Marginal Way and Corson Ave to 1st Ave S;
2. The Corson Building and Elysian Brewing located at the intersection of Airport Way S and Corson Ave S and Airport Way S and S Lucille St, respectively; and 110-7
3. Extend buffer zoning (UI, Commercial, or Mixed Use) along Airport Way S all the way to S Lucille St AND extend buffer zoning to the other side of Airport Way S all the way to the railroad. Current Mixed Use zoning proposals under Alternatives 2 and 4 only include one side of Airport Way S.
  - a. Along the added side of Airport Way S, consider UI so it preserves artist studios and allows for light industrial uses.

This is not a radical shift in industrial and maritime zoning practices. It is simply truing up the zoning to reflect the reality of our neighbors who already live and conduct business there. In addition, this would create a meaningful buffer zone between our residential areas, thriving commercial core, and heavy industry. This would also allow for more housing and more investment in the kinds of maker and artist studios that Georgetown prides itself on.

- A fundamental flaw of the DEIS process is that the accompanying mitigation measures are merely suggestions, and will not be put forward as binding legislation eventually passed by the City Council. This means that impacted residents citywide are forced by the City to make decisions that will have substantive and lasting impacts on their health and wellbeing without any commitment from the City to solve those issues. The City - when issuing the Final EIS - must send companion binding legislation to the City Council that codifies and funds recommended mitigation measures. 110-8

- The DEIS makes zoning changes that need accompanying policy commitments in order to maximize their impact. For example, rezoning part of Airport Way from Industrial to Mixed Use has lots of potential benefits for the neighborhood. However, it requires accompanying policies from the City - such as commitments regarding historic preservation and affordable housing - to ensure the zoning changes align with the policy intent of the neighborhood, and don't exacerbate affordability and equity issues. The City - when issuing the Final EIS - must send companion binding legislation to the City Council that codifies and funds policy commitments that center affordability and equity alongside zoning changes. 110-9

- While we appreciate OPCD's recent work to come into our communities and talk directly with our impacted neighbors, overall, the engagement process for both the Industrial & Maritime Strategy and the DEIS has been deeply inadequate. The policies being proposed and studied in the Strategy and DEIS impact every single resident, small business, and worker in and around the industrially zoned areas. However, the engagement process relied primarily on input from traditional stakeholders who have historically had access to power and influence. The GCC supports the Duwamish River Community Coalition's request for a year-long extension to the DEIS to allow for meaningful engagement with impacted residents. 110-10

For these reasons, the GCC calls on the City to fold the DEIS process into the Comprehensive Plan update, which is just beginning. There is an opportunity to make these issues accessible and compelling for residents across impacted communities. That approach must center language access, meeting people where they are, and community co-design. 110-11

This approach aligns with the timing of the robust engagement plan proposed for the Comprehensive Plan update. It would allow the Industrial & Maritime Strategy to get the attention from the City and community that it deserves by being included in OPCD's well-designed community outreach strategy.

Working together, we can create a holistic, sustainable, and community-driven industrial lands strategy that makes a real and lasting difference in entrenched challenges of affordability, environmental impacts, and equity across Seattle. The GCC remains ready to support these efforts.

Thank you for the opportunity to comment, and we look forward to the City's response.

Sincerely,  
Tiffany Dae, a business owner at Equinox Studios

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**Q2**

Please provide your name and email address.

|               |                                |
|---------------|--------------------------------|
| Name          | <b>Tiffany Dae</b>             |
| Email Address | <b>tiffanydaeart@gmail.com</b> |

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Holmes, Jim

**From:** Eleana Del Rio <edelrio@koplindelrio.com>  
**Sent:** Friday, April 15, 2022 3:03 PM  
**To:** Holmes, Jim  
**Subject:** Small Business Comment on the Industrial & Maritime DEIS

**CAUTION: External Email**

**Jim Holmes, Strategic Advisor**  
(206) 684-8372 [Jim.Holmes@seattle.gov](mailto:Jim.Holmes@seattle.gov)

Dear Mr. Holmes,

I am writing regarding the Industry and Maritime Strategy proposal to rezone Georgetown and South Park. As a small (arts) business owner, I feel that the DEIS and overall Strategy fall significantly short of meeting the needs and priorities of Georgetown residents, small businesses, and workers for the following reasons, among countless others:

- Insufficient study of impacts on existing vital arts and cultural resources in the district
- ALL alternatives reduce or eliminate existing affordable housing
- The proposal shows a lack of consideration towards existing communities, families and small businesses
- It privileges future growth of industrial and maritime usages over existing creative industries proven to support and sustain local business; the consequences could mean the end of Seattle's legacy of an art and cultural force - which has already near evaporated as a result of these kinds of rezoning plans which prioritize profit of a fee greedy developers

111-1

We call on the City Council and the Mayor's office to set aside the deeply flawed " Industrial and Maritime Strategy" which is outlined in the Draft Environmental Impact Statement and begin a serious attempt to bring Georgetown and South Park into the city's comprehensive plan instead of the piecemeal zoning attack outlined.

Best,  
Eleana  
--

**Eleana Del Rio**

[KOPLIN DEL RIO](#)  
6107 13th Ave South | Seattle, WA 98108  
206.999.0849 | c: 310.415.6172

**Current show**  
[heavy light](#)  
March 19 - April 23, 2022

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Holmes, Jim

**From:** Victor Facundo <vafacundo@gmail.com>  
**Sent:** Thursday, April 14, 2022 10:29 PM  
**To:** PCD\_Industry\_and\_Maritime@seattle.gov; Wentlandt, Geoffrey; Holmes, Jim  
**Cc:** Quirindongo, Rico; Harrell, Bruce; Harrell, Monisha; Burgess, Tim; McIntyre, Markham; Wong, Greg; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa; directors@georgetownneighborhood.com  
**Subject:** RE: Comment Period: Seattle Draft Environmental Impact Statement: Industrial and Maritime Strategy  
**Attachments:** 04.14.22 - GCC DEIS Comment (1).pdf

**CAUTION: External Email**

Hello everyone,

I am a local Georgetown Resident and I support the comment letter submitted by the Georgetown Community Council, which cites the City of Seattle's Draft Environmental Impact Statement (DEIS): Industrial and Maritime Strategy. 112-1

Please see attached letter for reference details.

Victor Facundo  
[vafacundo@gmail.com](mailto:vafacundo@gmail.com)

--  
Victor Facundo  
[vafacundo@gmail.com](mailto:vafacundo@gmail.com)



See Letter  
#96



April 15, 2022

Georgetown Community Council  
PO Box 80021  
Seattle, WA 98108

**RE: Comment on the Industrial & Maritime DEIS**

Dear OPCD Team,

The Georgetown Community Council (GCC), with endorsement from the King County International Airport Community Coalition (KCIACC) is writing to provide our feedback on the City of Seattle’s Draft Environmental Impact Statement (DEIS) regarding the Industrial & Maritime Strategy. While the DEIS and Strategy make welcome adjustments to zoning practices and move a small pocket of land out of the Duwamish Manufacturing Industrial Center (MIC), these changes are ultimately marginal. The DEIS and overall Strategy fall significantly short of meeting the needs and priorities of Georgetown residents, small businesses, and workers.

Our comments are as follows:

- We are glad to see the updated zoning concepts put forward by OPCD. In particular, we believe the Urban Industrial (UI) zoning has the potential for increased affordability, sustainability, and equitable outcomes if pursued and implemented well by the City. It also offers potential opportunities for more connectivity and better protections between the residential and heavy industrial areas of our neighborhood.

**However, the areas of Georgetown that are zoned UI in the DEIS will make no material changes to the lives of neighborhood residents and small businesses for the foreseeable future.** The vast majority of land that is zoned UI is owned by organizations that likely have no intention to sell - now or in the future. Examples include (in Alternatives Two and Four):

- Land along Ellis Ave that is owned by King County (Boeing Field), which may actually pursue expansion into the residential areas in the coming years; and

- Land along Corson Ave that is owned by the Washington State Department of Transportation, South Seattle College, and the Puget Sound Industrial Excellence Center.

While the City claims that UI zoning can create more substantive buffers between Georgetown residents and heavy industry - a longtime request of the neighborhood - the choice of locations for the UI zoned areas are nominal. **In addition, there are other zoning options that the City does not allow residents to consider - like Commercial 2 - that would create functional buffer zones between residents and heavy industry AND more accurately capture what is already happening in the area than Maritime, Manufacturing, and Logistics (MML), UI, or Industry and Innovation (II) zoning.**

It is also worth noting that a significant amount of land that is currently zoned Commercial 2 (C2) in the neighborhood - surrounding the Airport Way S and S Hardy St intersection - is industrial in practice due to its use by or proximity to Boeing Field. Historically, when industry encroaches on residential and commercial spaces, the loss of non-industrial land is not made up for elsewhere. This practice must end. For this reason, it's crucial that the City study additional expansion of buffer zoning - including C2 and Mixed Use - throughout the neighborhood to mitigate against likely future losses in non-industrial land.

We wish to connect the entire neighborhood, not just the "Triangle" along Airport Way S between Corson Ave S and S Bailey St. The DEIS alternatives are effectively incomplete because they do not study the impacts of additional types of zoning other than the three put forward by OPCD. **We urge the City to create legitimate buffer zones between residences and heavy industry by extending the UI zones currently proposed in Alternatives Two and Four and by studying the impacts of other, non-industrial types of zoning. Fundamentally, Georgetown residents are looking for a decrease in MML zoning, as it creates adverse impacts to our health and quality of life.**

- At its most ambitious (Alternative Four), the DEIS still zones 87 percent of industrial land as MML, which represents only a three percent adjustment from current zoning. Lands zoned as MML cannot accommodate new affordable housing which, as the City knows, Georgetown and South Park stakeholders identified as a top issue that must be addressed in the Industrial & Maritime Strategy. These lands also allow the continued proliferation of heavy industry, which has an outside impact on resident health outcomes and quality of life.

**Frustratingly, the City's understanding of Georgetown continues to be completely out of sync with the reality on the ground. Much of the land the City has zoned as MML has - in reality - been full of mixed uses for decades.** For this reason, we ask that the City study updating the following areas from MML to zoning that does not allow heavy industry to proliferate, including UI, Mixed Use, and/or Commercial:

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  - a. Along the added side of Airport Way S, consider UI so it preserves artist studios and allows for light industrial uses.

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- The DEIS makes zoning changes that need accompanying policy commitments in order to maximize their impact. **For example, rezoning part of Airport Way from Industrial to Mixed Use has lots of potential benefits for the neighborhood. However, it requires accompanying policies from the City - such as commitments regarding historic preservation and affordable housing - to ensure the zoning changes align with the policy intent of the neighborhood, and don't exacerbate affordability and equity issues.** The City - when issuing the Final EIS - must send companion binding legislation to



the City Council that codifies and funds policy commitments that center affordability and equity alongside zoning changes.

- While we appreciate OPCD's recent work to come into our communities and talk directly with our impacted neighbors, overall, the engagement process for both the Industrial & Maritime Strategy and the DEIS has been deeply inadequate. **The policies being proposed and studied in the Strategy and DEIS impact every single resident, small business, and worker in and around the industrially zoned areas. However, the engagement process relied primarily on input from traditional stakeholders who have historically had access to power and influence.** The GCC supports the Duwamish River Community Coalition's request for a year-long extension to the DEIS to allow for meaningful engagement with impacted residents.

**For these reasons, the GCC calls on the City to fold the DEIS process into the Comprehensive Plan update, which is just beginning. There is an opportunity to make these issues accessible and compelling for residents across impacted communities. That approach must center language access, meeting people where they are, and community co-design.**

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Working together, we can create a holistic, sustainable, and community-driven industrial lands strategy that makes a real and lasting difference in entrenched challenges of affordability, environmental impacts, and equity across Seattle. The GCC remains ready to support these efforts.

Thank you for the opportunity to comment, and we look forward to the City's response.

Sincerely,

Greg Ramirez  
Chair  
Georgetown Community Council

Velma Veloria  
Chair

King County International Airport Community Coalition

**Holmes, Jim**

Letter #113

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**From:** Erin Gallagher <erinkaygallagher@gmail.com>  
**Sent:** Friday, April 15, 2022 12:05 PM  
**To:** PCD\_Industry\_and\_Maritime@seattle.gov; Wentlandt, Geoffrey; Holmes, Jim  
**Cc:** Quirindongo, Rico; Harrell, Bruce; Harrell, Monisha; Burgess, Tim; McIntyre, Markham; Wong, Greg; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa; directors@georgetownneighborhood.com  
**Subject:** Comment on the City's Industrial/Maritime Zoning Strategy

**CAUTION: External Email**

Hello,

As a resident of Georgetown, I take great pride in my neighborhood. That includes knowing my neighbors and supporting the local businesses that surround and support us. We know that living in an industrial area already increases certain health risks, and we have seen firsthand the effects of rising real estate and property tax costs on our neighbors. 113-1

With this in mind, I support the comment letter from the Georgetown Community Council and urge you to fold the DEIS process into the Comprehensive Plan update.

Thank you,  
Erin Gallagher

**From:** John Kirschenbaum <jnkbaum@gmail.com>  
**Sent:** Friday, April 15, 2022 7:49 AM  
**To:** Geoffrey.Wendlandt@seattle.gov; Holmes, Jim  
**Subject:** Response to the IMS/DEIS

**CAUTION: External Email**

Mr. Wendlandt & Mr. Holmes,

I'm writing to respond to the proposed zoning changes described in the IMS/DEIS. I am an artist-craftsman and have had a studio at Equinox Studios for 14 years.

I received an email from your office 3 weeks ago inviting comments on possible zoning changes in South Park & Georgetown. At first, I thought this might be the start of an information gathering process. Sadly, that was not the case. I came to find out that at the end of a 2-year period the community of families, small business owners and daily worker/residents have 3 weeks to try to digest a lot of unfamiliar information and terminology and intelligently respond. And that opportunity only became possible due to advocacy from groups in the neighborhood. Therefore, it is not surprising that the proposed changes are marginal at best and favor the large industrial enterprises who have had plenty of time and resources to lobby for their interests. The status quo has many current and future issues involving affordable housing, the lack of food and medical resources, traffic, pollution, crime, further effects of climate change, to mention just a few. None of these are seriously addressed in the zoning proposals. Many other issues such as impact on cultural, historic and archaeological resources and community character and quality are not adequately addressed. This falls very short of a comprehensive environmental impact study. Much more work needs to be done. At the very least I would support the Duwamish River Community's request for a year long extension to the DEIS procedure to engage the community in a meaningful way.

114-1

114-2

I have seen Equinox Studios grow from 35 artists and artisans in one building to a diverse community of 175 artists, artisans and small non-profit community supporting organizations. That has been possible due to demand for affordable workspace, the vision to figure out how to create it and hard work, a lot of hard work. There is a lot to learn here, I'm sure you know who to ask. Imagine what the city, with far more resources itself and guided engagement of the private sector could accomplish.

114-3

I encourage and challenge you to expand the scope and vision of your efforts beyond just zoning to include plans and policies that encourage and support holistic growth for the whole community.

114-4

Respectfully,  
John Kirschenbaum  
[jnkbaum@gmail.com](mailto:jnkbaum@gmail.com)  
206 550 9722

Holmes, Jim

Letter #115

From: jermesin@gmail.com
Sent: Thursday, April 14, 2022 2:01 PM
To: Holmes, Jim
Subject: Re: GT feedback

CAUTION: External Email

Thanks!

And can you also add that I agree with everything the GCC says and wrote more eloquently and elaborate than I was able to do (see below)

Best,
Melissa

115-1

Dear OPCD Team,

See Letter #96

The Georgetown Community Council (GCC) is writing to provide our feedback on the City of Seattle’s Draft Environmental Impact Statement (DEIS) regarding the Industrial & Maritime Strategy. While the DEIS and Strategy make welcome adjustments to zoning practices and move a small pocket of land out of the Duwamish Manufacturing Industrial Center (MIC), these changes are ultimately marginal. The DEIS and overall Strategy fall significantly short of meeting the needs and priorities of Georgetown residents, small businesses, and workers.

The GCC’s comments are as follows:

- We are glad to see the updated zoning concepts put forward by OPCD. In particular, we believe the Urban Industrial (UI) zoning has the potential for increased affordability, sustainability, and equitable outcomes if pursued and implemented well by the City. It also offers potential opportunities for more connectivity and better protections between the residential and heavy industrial areas of our neighborhood.

However, the areas of Georgetown that are zoned UI in the DEIS will make no material changes to the lives of neighborhood residents and small businesses for the foreseeable future. The vast majority of land that is zoned UI is owned by organizations that likely have no intention to sell - now or in the future. Examples include (in Alternatives Two and Four):

- Land along Ellis Ave that is owned by King County (Boeing Field), which may actually pursue expansion into the residential areas in the coming years; and
Land along Corson Ave that is owned by the Washington State Department of Transportation, South Seattle College, and the Puget Sound Industrial Excellence Center.

While the City claims that UI zoning can create more substantive buffers between Georgetown residents and heavy industry - a longtime request of the neighborhood - the choice of locations for the UI zoned areas are nominal. In addition, there are other zoning options that the City does not allow residents to consider - like Commercial 2 - that would create functional buffer zones between residents and heavy industry AND more accurately capture what is already happening in the area than Maritime, Manufacturing, and Logistics (MML), UI, or Industry and Innovation (II) zoning.

It is also worth noting that a significant amount of land that is currently zoned Commercial 2 in the neighborhood - surrounding the Airport Way S and S Hardy St intersection - is industrial in practice due to its use by or proximity to Boeing Field. Historically, when industry encroaches on residential and commercial spaces, the loss of non-industrial land is not made up for elsewhere. This practice must end. For this reason, it’s crucial that the City study additional expansion of buffer zoning - including C2 and Mixed Use - throughout the neighborhood to mitigate against likely future losses in non-industrial land.

We wish to connect the entire neighborhood, not just the “Triangle” along Airport Way S between Corson Ave S and S Bailey St. The DEIS alternatives are effectively incomplete because they do not study the impacts of additional types of zoning other than the three put forward by OPCD. We urge the City to create legitimate buffer zones between residences and heavy industry by extending the UI zones currently proposed in Alternatives Two and Four and by studying the impacts of other, non-industrial types of zoning. Fundamentally, Georgetown residents are looking for a decrease in MML zoning, as it creates adverse impacts to our health and quality of life.

- At its most ambitious (Alternative Four), the DEIS still zones 87 percent of industrial land as MML, which represents only a three percent adjustment from current zoning. Lands zoned as MML cannot accommodate new affordable housing which, as the City knows, Georgetown and South Park stakeholders identified as a top issue that must be addressed in the Industrial & Maritime Strategy. These lands also allow the continued proliferation of heavy industry, which has an outside impact on resident health outcomes and quality of life.

Frustratingly, the City’s understanding of Georgetown continues to be completely out of sync with the reality on the ground. Much of the land the City has zoned as MML has - in reality - been full of mixed uses for decades. For this reason, we ask that the City study updating the following areas from MML to zoning that does not allow heavy industry to proliferate, including UI, Mixed Use, and/or Commercial:

- The entire area from Orcas St. to E Marginal Way and Corson Ave to 1st Ave S;
- The Corson Building and Elysian Brewing located at the intersection of Airport Way S and Corson Ave S and Airport Way S and S Lucille St, respectively; and
- Extend buffer zoning (UI, Commercial, or Mixed Use) along Airport Way S all the way to S Lucille St AND extend buffer zoning to the other side of Airport Way S all the way to the railroad. Current Mixed Use zoning proposals under Alternatives 2 and 4 only include one side of Airport Way S.

- Along the added side of Airport Way S, consider UI so it preserves artist studios and allows for light industrial uses.

This is not a radical shift in industrial and maritime zoning practices. **It is simply truing up the zoning to reflect the reality of our neighbors who already live and conduct business there.** In addition, this would create a meaningful buffer zone between our residential areas, thriving commercial core, and heavy industry. This would also allow for more housing and more investment in the kinds of maker and artist studios that Georgetown prides itself on.

- A fundamental flaw of the DEIS process is that the accompanying mitigation measures are merely suggestions, and will not be put forward as binding legislation eventually passed by the City Council. **This means that impacted residents citywide are forced by the City to make decisions that will have substantive and lasting impacts on their health and wellbeing without any commitment from the City to solve those issues.** The City - when issuing the Final EIS - must send companion binding legislation to the City Council that codifies and funds recommended mitigation measures.
- The DEIS makes zoning changes that need accompanying policy commitments in order to maximize their impact. **For example, rezoning part of Airport Way from Industrial to Mixed Use has lots of potential benefits for the neighborhood. However, it requires accompanying policies from the City - such as commitments regarding historic preservation and affordable housing - to ensure the zoning changes align with the policy intent of the neighborhood, and don't exacerbate affordability and equity issues.** The City - when issuing the Final EIS - must send companion binding legislation to the City Council that codifies and funds policy commitments that center affordability and equity alongside zoning changes.
- While we appreciate OPCD's recent work to come into our communities and talk directly with our impacted neighbors, overall, the engagement process for both the Industrial & Maritime Strategy and the DEIS has been deeply inadequate. **The policies being proposed and studied in the Strategy and DEIS impact every single resident, small business, and worker in and around the industrially zoned areas. However, the engagement process relied primarily on input from traditional stakeholders who have historically had access to power and influence.** The GCC supports the Duwamish River Community Coalition's request for a year-long extension to the DEIS to allow for meaningful engagement with impacted residents.

**For these reasons, the GCC calls on the City to fold the DEIS process into the Comprehensive Plan update, which is just beginning. There is an opportunity to make these issues accessible and compelling for residents across impacted communities. That approach must center language access, meeting people where they are, and community co-design.**

This approach aligns with the timing of the robust engagement plan proposed for the Comprehensive Plan update. It would allow the Industrial & Maritime Strategy to get the attention from the City and community that it deserves by being included in OPCD's well-designed [community outreach strategy](#).

Working together, we can create a holistic, sustainable, and community-driven industrial lands strategy that makes a real and lasting difference in entrenched challenges of affordability, environmental impacts, and equity across Seattle. The GCC remains ready to support these efforts.

Thank you for the opportunity to comment, and we look forward to the City's response.

Sincerely,  
Georgetown Community Council (GCC)

On Thu, Apr 14, 2022 at 1:50 PM <[jermesin@gmail.com](mailto:jermesin@gmail.com)> wrote:

Thanks Jim!

On Thu, Apr 14, 2022 at 9:51 AM Holmes, Jim <[Jim.Holmes@seattle.gov](mailto:Jim.Holmes@seattle.gov)> wrote:

Thank you Melissa:

Sending your comment directly to me works. I will include this with the other comments for the Final EIS.

---

**From:** [jermesin@gmail.com](mailto:jermesin@gmail.com) <[jermesin@gmail.com](mailto:jermesin@gmail.com)>

**Sent:** Thursday, April 14, 2022 9:49 AM

**To:** Holmes, Jim <[Jim.Holmes@seattle.gov](mailto:Jim.Holmes@seattle.gov)>

**Subject:** GT feedback

Hi Jim,

I went to one of the land use meetings in Georgetown last week. My understanding is that as a GT resident and worker I can submit thoughts/comments 4/15 but I can't find any information on the flyers or website on how or where. Could you please help me get this to the right spot.

It was similar in the meeting when yall were talking about reporting pollution concerns- I still don't know how/who/where to report something like that.

If you want feedback or to empower people to have a say or feel heard, making it clearer on how to do it is important.

With the zoning-my biggest concern is making the neighborhood a safe place to be for everyone who uses it. I don't know how any of the planned zoning changes will actually do that- from an environmental, to roads and sidewalks, to crime. These are all really big concerns, and I didn't see that they were being addressed in the options or mitigations.

Second would be affordability- both for people living here and working here.

I would be supportive of whichever option supported both of these things the most, but my biggest concern is that none of the zoning change (or not change) options would do much or have much impact with any of this.

Best,  
Melissa

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Melissa K. Knowles (she/her)  
Duwamish land aka Seattle WA 98108, USA  
+1-615-668-7576  
[www.mostversatile.com](http://www.mostversatile.com)  
[www.artbiquity.com](http://www.artbiquity.com)

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## Holmes, Jim

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**From:** jermesin@gmail.com  
**Sent:** Thursday, April 14, 2022 9:49 AM  
**To:** Holmes, Jim  
**Subject:** GT feedback

**CAUTION: External Email**

Hi Jim,

I went to one of the land use meetings in Georgetown last week. My understanding is that as a GT resident and worker I can submit thoughts/comments 4/15 but I can't find any information on the flyers or website on how or where. Could you please help me get this to the right spot.

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**Holmes, Jim**

Letter #116

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**From:** holly krejci <holly.krejci@gmail.com>  
**Sent:** Friday, April 15, 2022 8:27 AM  
**To:** OPCD\_Industry\_And\_Maritime\_Strategy@seattle.gov  
**Cc:** Quirindongo, Rico; Harrell, Bruce; Harrell, Monisha; Burgess, Tim; McIntyre, Markham; Wong, Greg; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa; Wentlandt, Geoffrey; Holmes, Jim  
**Subject:** Georgetown Resident Comment on Industrial & Maritime DEIS  
**Attachments:** DEIS\_Comments\_April\_2022\_Krejci.pdf

**CAUTION: External Email**

Dear OPCD and City leadership -

Attached please find my comments on the City's Industrial & Maritime Draft Environmental Impact Statement. I believe significant change is needed to achieve a progressive, affordable, and sustainable strategy that meets the needs of Georgetown residents, small businesses, and workers.

I look forward to continuing the conversation.

Best,  
Holly  
Georgetown resident since 2003  
KCIACC member  
KCIA Roundtable member

--

April 15, 2022

City of Seattle

Office of Planning and Community Development (OPCD)

Via email [OPCD\\_Industry\\_And\\_Maritime\\_Strategy@seattle.gov](mailto:OPCD_Industry_And_Maritime_Strategy@seattle.gov)

**RE: Industrial and Maritime Strategy Draft Environmental Impact Statement**

Dear Office of Planning & Community Development team,

I'm writing to express my concerns with the draft environmental impact study (DEIS) of Seattle's 6,000 acres of industrial land, specifically as it relates to Georgetown and the Duwamish Valley.

**We have before us an opportunity to do things differently, to address past and prevent future harm.** We can, and must, do better.

**Zoning dictates investment.** We need only look at the [1936 HOLC map of Seattle](#) to understand the history of harm as a result of zoning decisions. We can see the lines of environmental injustice and the [health impacts to communities](#). What impact to future decisions does advancing a previous administration's plan and approach have to the current administration's Seattle Transportation Plan and Comprehensive Plan updates?

116-1

**Government's greatest role is that of convener and facilitator.** Government has the power and responsibility to bring together stakeholders with vastly disparate views and align them on values to achieve outcomes that benefit all.

**Bold, innovative ideas are born in the differences of perspectives.** While it is true that residents were invited to participate, access to do so was limited. Imagine being invited to a fancy dinner party, only to arrive and find yourself seated at the "kids table" with limited to no access to the adult activities. Such was the structure of the engagement of residents in the strategy development. The maritime industrial strategy engagement process failed to engage meaningfully residents in the development of the recommendations that shape the DEIS.

**I support the comments made by the Georgetown Community Council and the Duwamish River Clean-up Coalition**, and offer the following to be considered for future study:

Who works in our industrial areas? This requires a review of disaggregated data by race, gender, age, and location to truly understand who works in the Duwamish MIC. Who works in the high-paying, living wage jobs? Who has access to these jobs and who doesn't? What are the wage projections of future green jobs and how do they compare to the "family-wage" trade jobs?

116-2

Who benefits from ownership of industrial land? Who owns the land by race and gender?

Future expansion plans of the King County International Airport (KCIA) and the cumulative effect on the health of workers and residents in the Duwamish. KCIA is embarking in a master plan update, the timing of which aligns the City's comprehensive plan update process.

116-3

What is the current impact to industry of the current uses (not zoning) in the IG zones from Airport Way S to 1<sup>st</sup> Ave S? While the proposed industrial maritime zoning strategy recommendations are an improvement to the one-size-fits-all proposed in previous studies, they fail to provide a meaningful evaluation of Georgetown as an industrial neighborhood as a whole.

116-4

What is the future of industry? What does it look like – Amazon warehouses? Large-scale manufacturing? What are the wages of these jobs? Who benefits and who doesn't?

116-5

**The DEIS makes zoning changes that need accompanying policy commitments in order to maximize their impact and enforce mitigation measures.** This requires legislation.

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 enforcement and implementation of any proposed mitigations measures adopted in a final EIS.

116-6

**Either or thinking limits innovation.** What will it take for the City and industrial stakeholders to accept that despite over a century of efforts, Georgetown, the first settlement of King County, is here to stay AND that working to improve the health and safety of residents benefits all of those who work, play, and live in the Duwamish MIC.

**While I appreciate OPCD's extension of the comment period, and the efforts of department staff, it pales in comparison to the engagement strategy planned for the Seattle Transportation Plan and the Comprehensive Plan update.**

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 the Duwamish industrial areas that necessitates new restrictions that permanently constrain areas of Georgetown and allows time for more meaningful engagement.

116-7

Thank you for your service to community. I look forward to continuing the conversation and working together toward better, for all.

Sincerely,

Holly Krejci  
Georgetown resident since 2003  
KCIACC member

CC:

Rico.Quirindongo@seattle.gov; Bruce.Harrell@seattle.gov; Monisha.Harrell@seattle.gov;  
Tim.Burgess@seattle.gov; Markham.Mcintyre@seattle.gov; Greg.Wong@seattle.gov;  
tammy.morales@seattle.gov; sara.nelson@seattle.gov; teresa.mosqueda@seattle.gov;  
Geoffrey.Wentlandt@seattle.gov; Jim.Holmes@seattle.gov

Holmes, Jim

Letter #117

**From:** Steve Lannen <stevellannen@gmail.com>  
**Sent:** Friday, April 15, 2022 4:38 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy; Wentlandt, Geoffrey; Holmes, Jim  
**Cc:** Quirindongo, Rico; Harrell, Bruce; Harrell, Monisha; Burgess, Tim; McIntyre, Markham; Wong, Greg; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa; directors@georgetownneighborhood.com  
**Subject:** DEIS Comment

**CAUTION: External Email**

As a Georgetown resident, I have concerns about the process that lead to the proposed DEIS alternatives focusing on Georgetown.

With any policy development process, good inputs are needed to realize good outputs and outcomes.

As I understand, nearly all the meetings and discussions to develop the alternatives occurred during the Covid-19 pandemic which meant meetings occurred on Zoom likely compromising comprehension and discussion. especially for those not already very familiar with land use planning and zoning.

It is also apparent that hardly anyone in the neighborhood knew about the DEIS process until the alternatives were already developed. I understand that two resident representatives from Georgetown and South Park participated in the discussions. However, I am told that their input was not taken seriously by other stakeholders and the result was, as characterized by one representative, "crumbs."

117-1

Then, the initial comment period with a March 2 deadline, unfortunately coincided with the Omicron wave. There was no opportunity to host information sessions or engage residents except for a couple poorly attended Zoom sessions on a weekday and weeknight.

The extension for Georgetown residents has allowed for better engagement and allowed for one in-person information session that was well attended last month at a community center. Still, I don't think anyone would say the engagement has been adequate to inform residents about decisions that could affect them, their homes, and be in place for the next 20 or 30 years.

I think that the discussion around the four alternatives is lacking in part because the alternatives themselves are lacking when it comes to Georgetown and its residents. Which goes back to the need for good inputs to achieve good outcomes. More discussion and engagement from residents of Georgetown and South Park are needed to develop a zoning alternative that will allow the neighborhoods to realize their potential, not exacerbate poor health outcomes, and allow the surrounding industry/maritime to do their business.

117-2

Therefore, I support the comment letter from the Georgetown Community Council and urge you to fold the DEIS process into the Comprehensive Plan update rather than recommending one of the current alternatives.

117-3

Sincerely,

Steve Lannen  
6640 Carleton Ave. S  
Georgetown, Seattle

#8

Letter #118

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, April 15, 2022 1:48:42 PM  
**Last Modified:** Friday, April 15, 2022 1:50:35 PM  
**Time Spent:** 00:01:53  
**IP Address:** 76.121.216.113

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Page 1: Draft EIS Comment

**Q1**

After reviewing the Draft EIS, send us a comment to suggest how the analysis can be improved or any other concern or question you may have related to the Draft EIS.

I reject this draft on the Industry and Maritime Strategy proposal to rezone Georgetown and South Park - for the following reasons:

- \* Insufficient study of impacts on existing vital arts and culture resources in the district
- \*All alternatives reduce or eliminate potential affordable housing
- \*Shows lack of consideration towards existing communities, families, and small business
- \*Threatens the future of core working art space which could sorely limit intrinsic creative resources
- \*Privileges future growth of industrial and maritime usages over existing creative industries proven to support and sustain local businesses; the consequences could mean the end of Seattle's legacy as an art and cultural force

118-1

**Q2**

Please provide your name and email address.

Name **Tracy Madison**  
Email Address **tracy.mad@gmail.com**

---

Holmes, Jim

Letter #119

**From:** ROsario-Maria <1rosariomaria@gmail.com>  
**Sent:** Friday, April 15, 2022 1:44 PM  
**To:** PCD\_Industry\_and\_Maritime@seattle.gov; Wentlandt, Geoffrey; Holmes, Jim; Harrell, Bruce; Harrell, Monisha; Burgess, Tim; McIntyre, Markham; Wong, Greg; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa; GCC directors; Quirindongo, Rico  
**Subject:** Comment on the City's Industrial/Maritime Zoning Strategy

**CAUTION: External Email**

Dear OPCD Team,

I support the comment letter from the Georgetown Community Council and urge you to fold the DEIS process into the Comprehensive Plan update. 119-1

I also ask that you consider the flooding risks and consider the impact these plans could have to cause more environmental harm. 119-2

Please do the right thing and create possibilities for indigenous sovereignty and real environmental justice. 119-3

Rosario-Maria Medina (Chayo)  
4th Generation Georgetown Resident  
Chayo Consulting LLC



Holmes, Jim

Letter #120

**From:** Kate Miller <kate.miller@wainnocenceproject.org>  
**Sent:** Friday, April 15, 2022 10:35 AM  
**To:** PCD\_Industry\_and\_Maritime@seattle.gov; Wentlandt, Geoffrey; Holmes, Jim  
**Cc:** Quirindongo, Rico; Harrell, Bruce; Harrell, Monisha; Burgess, Tim; McIntyre, Markham; Wong, Greg; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa; directors@georgetownneighborhood.com  
**Subject:** Comment on industrial maritime zoning strategy

**CAUTION: External Email**

Dear OCPD team,

I'm a resident of Georgetown and am writing to provide feedback on the city's DEIS regarding the Industrial and Maritime Strategy. While I appreciate the potential for Urban Industrial zoning to increase affordability in the neighborhood, I am concerned that the proposed UI zones in the DEIS will make no actual changes for those of us living in the neighborhood. As such, I support the comment letter from the Georgetown Community Council and urge you to fold the DEIS process into the Comprehensive Plan update.

120-1

Sincerely,  
Kate Miller

--  
**Kate Miller** (she/her)  
Staff Attorney  
(206) 636-9493



Holmes, Jim

Letter #121

**From:** Kay Morrison <kay@georgetowncda.org>  
**Sent:** Friday, April 15, 2022 12:59 PM  
**To:** Wentlandt, Geoffrey; Holmes, Jim  
**Subject:** Comment on Industry and Maritime Strategy proposal

CAUTION: External Email

Good afternoon,

For the past 15 years I have been a part of the Equinox Studios art community in Georgetown and now I also work in the neighborhood. I refer to Georgetown as the last bastion of Seattle's once vibrant and supported art scene. This place feels like Seattle to me and I'm very concerned that the proposed Industry and Maritime Strategy does not take into account the economic and cultural value that the arts and artisans of Georgetown provide to Seattle.

121-1

Before moving forward in any way on this proposal there needs to be a deep assessment of who is in Georgetown now, what they provide to the neighborhood and city, and what would happen if the artistic home base for thousands of artists is dismantled. Here are some additional points as to why this proposal needs to be rejected:

- \* Insufficient study of impacts on existing vital arts and culture resources in the district
- \* All alternatives reduce or eliminate potential affordable housing
- \* Shows lack of consideration towards existing communities, families, and small business
- \* Threatens the future of core working art space which could sorely limit intrinsic creative resources
- \* Privileges future growth of industrial and maritime usages over existing creative industries proven to support and sustain local businesses; the consequences could mean the end of Seattle's legacy as an art and cultural force.

121-2

Thank you for your consideration. I will look forward to hearing what the next steps in this process are.

121-3

Best,

Kay Morrison  
Blacksmith. Builder. Community Organizer.

Holmes, Jim

Letter #122

**From:** Tim Neill <neilltm@gmail.com>  
**Sent:** Friday, April 15, 2022 4:37 PM  
**To:** geoffrey.wendtlandt@seattle.gov; Holmes, Jim; PCD\_Industry\_And\_Maritime\_Strategy  
**Cc:** Georgetown Community Council; Tim Blok; Harrell, Bruce; Wong, Greg; McIntyre, Markham; Harrell, Monisha; Quirindongo, Rico; Nelson, Sara; Morales, Tammy; Mosqueda, Teresa; Burgess, Tim  
**Subject:** City Industrial/Maritime Zoning Strategy - Comment

**CAUTION: External Email**

Good afternoon,

I'm writing to provide comments on the proposed zoning strategy for industrial/maritime lands. I was born and raised in Seattle (graduated from Ballard High School), and in 2020 my husband and I bought our first house in Georgetown, where we are currently living and raising our dog Hank.

I have several concerns with the proposed strategy:

- Insufficient buffer zones between residential areas and heavy industry, which has numerous impacts on human health and wellness
- No stated commitment to mitigating impacts to the environment in an area that is already heavily affected by industrial activity
- No commitment to creation of affordable housing, and no plans for avoiding displacement of existing residents
- No guarantee of preserving historic buildings to retain area's character

122-1

I believe the proposed strategy should be incorporated into the citywide planning update process already underway. I have read and fully support the comment letter from the Georgetown Community Council and agree that the DEIS process be incorporated into the Comprehensive Plan update.

122-2

We love living in Georgetown, and want the City to make thoughtful and careful decisions in developing the neighborhood to preserve and cultivate a unique and healthy community.

122-3

Please let me know if you have any questions.

Thanks,

Tim Neill, Tim Blok & Hank the dog

**From:** Kathy N <kenyland@comcast.net>  
**Sent:** Friday, April 15, 2022 12:22 PM  
**To:** PCD\_Industry\_and\_Maritime@seattle.gov  
**Cc:** Wentlandt, Geoffrey; Holmes, Jim; Quirindongo, Rico; Harrell, Bruce; Harrell, Monisha; Burgess, Tim; McIntyre, Markham; Wong, Greg; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa  
**Subject:** Public Comment re: Maritime DEIS

**CAUTION: External Email**

Re: The Maritime and Industry Draft Environmental Impact Statement (DEIS).

I will admit this feels like déjà vu. I am drafting a similar message to the one I sent in 2007- 15 years ago! I was hoping the city’s approach would be different, but I am afraid it is not. When the draft EIS was released in mid-December 2021, the city was soliciting community feedback during the holidays. That was an indicator that this process was not geared with people in mind.

123-1

On March 30, 2022, I attended an open house hosted by the Office of Planning and Community Development (OPCD). OPCD provided background to their Maritime and Industry strategy and their efforts to support and grow new economic opportunities in industrial and maritime areas.

At first blush, that seems reasonable, however, as a resident of Georgetown, that approach misses the mark. Georgetown is unique for so many reasons, one being that the core of our residential area is surrounded by industry. No other community exists in a sea of IG! This is why we should always be part of the conversation and part of the solution. You should talk with us rather than at us.

123-2

OPCD talked about the importance of industry- the high paying jobs, the entry point, and the opportunities that don’t necessarily require a degree. Times have changed and those descriptors are not exclusive to industry. Many companies- public AND private- are no longer requiring degrees. And while industry may offer pathways to more diverse candidates, is that happening?

**I ask these questions because one again it feels like the City of Seattle and OPCD’s assumptions are outdated, and their approach misguided.**

During OPCD’s open house, they provided context about the purpose of the DEIS, that ‘it studies the impacts of changes’. The question is, which impacts? Who is being impacted? The focus of the entire EIS process was focused solely on economic impacts and opportunities. They talked about industry and the opportunities of the livability. Again, the question is, the livability of who? Residents were rarely, if ever acknowledged. Often residence

123-3

OPCD then went to present three “new zones”. They were quite enthusiastic about Urban Industrial (UI) and described this innovative approach as a “safe and comfortable design”.

**Question: why isn’t safety and comfortable designed into ALL zones?**

The question I asked back in 2007, and 2010, 2012 and today is what problem are we trying to solve? Has there been a preponderance of industrial land being rezoned? The answer has been, and likely continues to be no. Who then is driving this? Labor? Previous Mayors? Past agendas? Are those the right reasons for something so important? It feels like this effort is reactive and we are missing an opportunity to be proactive. Our short-term actions have long-term implications.

123-4

Mayor Bruce Harrell talks about One City but the approach by OPCD around industrial land continues to divide and segregate. Again, safety and comfort are guiding principles to certain zones.

One of the most pressing needs of Seattle is housing. This DEIS does not address that need: it only hampers. Take a step back and start anew with this strategic initiative, bring more chairs to the table, more voices to the conversation. Let's look at how industry AND mixed use AND residential can co-exist. Let's have success, success that does not come at the expense of another. The importance of livability should be applicable to everyone.

Mayor Harrell and his new administration have an opportunity to do something different. They do not have to continue something that was in progress. They can course correct and reimagine. Let's move away from preserving what was and instead shift our focus on what we could be, what we want to be.

**My ask of Mayor Harrell is- Be different. Do different. We believe you can do better, and we deserve better.**

- I support the position the Georgetown Community Council has taken.
- I support that OPCD review all of Georgetown, not just a small section that is already mixed use and commercial.
- I support that all zones be comfortable and safe.
- I support that all zones offer housing options and pedestrian access and yes, even open space.
- I support the notion that the city study impacts to all stakeholders not just how industry is impacted.
- I support that housing be allowed in more expansive areas throughout Georgetown and the city.
- I support that workforce housing be allowed in all employment areas, including the MIC. And allowance should be broader than what OPCD is proposing.
- I support having housing and density near our major transit centers, like light rail (hello SoDo and Lander).
- I support that we truly engage those impacted, not just hand selected representatives or paid advocates.
- I support the idea of not just pausing but major overhaul to do this right.
- I support the sequencing of a Comp Plan coming first and then further conversations about industrial land, if needed. We have so many plans (comp plan, industry, transportation). They should be aligned, complementing each other and not segregate and competing against one another)

123-5

Thank you for your consideration.

Kathy Nyland

Sent from [Mail](#) for Windows



See Letter  
#96



April 15, 2022

Georgetown Community Council  
PO Box 80021  
Seattle, WA 98108

**RE: Comment on the Industrial & Maritime DEIS**

Dear OPCD Team,

The Georgetown Community Council (GCC), with endorsement from the King County International Airport Community Coalition (KCIACC) is writing to provide our feedback on the City of Seattle's Draft Environmental Impact Statement (DEIS) regarding the Industrial & Maritime Strategy. While the DEIS and Strategy make welcome adjustments to zoning practices and move a small pocket of land out of the Duwamish Manufacturing Industrial Center (MIC), these changes are ultimately marginal. The DEIS and overall Strategy fall significantly short of meeting the needs and priorities of Georgetown residents, small businesses, and workers.

Our comments are as follows:

- We are glad to see the updated zoning concepts put forward by OPCD. In particular, we believe the Urban Industrial (UI) zoning has the potential for increased affordability, sustainability, and equitable outcomes if pursued and implemented well by the City. It also offers potential opportunities for more connectivity and better protections between the residential and heavy industrial areas of our neighborhood.

**However, the areas of Georgetown that are zoned UI in the DEIS will make no material changes to the lives of neighborhood residents and small businesses for the foreseeable future.** The vast majority of land that is zoned UI is owned by organizations that likely have no intention to sell - now or in the future. Examples include (in Alternatives Two and Four):

- Land along Ellis Ave that is owned by King County (Boeing Field), which may actually pursue expansion into the residential areas in the coming years; and

- Land along Corson Ave that is owned by the Washington State Department of Transportation, South Seattle College, and the Puget Sound Industrial Excellence Center.

While the City claims that UI zoning can create more substantive buffers between Georgetown residents and heavy industry - a longtime request of the neighborhood - the choice of locations for the UI zoned areas are nominal. **In addition, there are other zoning options that the City does not allow residents to consider - like Commercial 2 - that would create functional buffer zones between residents and heavy industry AND more accurately capture what is already happening in the area than Maritime, Manufacturing, and Logistics (MML), UI, or Industry and Innovation (II) zoning.**

It is also worth noting that a significant amount of land that is currently zoned Commercial 2 (C2) in the neighborhood - surrounding the Airport Way S and S Hardy St intersection - is industrial in practice due to its use by or proximity to Boeing Field. Historically, when industry encroaches on residential and commercial spaces, the loss of non-industrial land is not made up for elsewhere. This practice must end. For this reason, it's crucial that the City study additional expansion of buffer zoning - including C2 and Mixed Use - throughout the neighborhood to mitigate against likely future losses in non-industrial land.

We wish to connect the entire neighborhood, not just the "Triangle" along Airport Way S between Corson Ave S and S Bailey St. The DEIS alternatives are effectively incomplete because they do not study the impacts of additional types of zoning other than the three put forward by OPCD. **We urge the City to create legitimate buffer zones between residences and heavy industry by extending the UI zones currently proposed in Alternatives Two and Four and by studying the impacts of other, non-industrial types of zoning. Fundamentally, Georgetown residents are looking for a decrease in MML zoning, as it creates adverse impacts to our health and quality of life.**

- At its most ambitious (Alternative Four), the DEIS still zones 87 percent of industrial land as MML, which represents only a three percent adjustment from current zoning. Lands zoned as MML cannot accommodate new affordable housing which, as the City knows, Georgetown and South Park stakeholders identified as a top issue that must be addressed in the Industrial & Maritime Strategy. These lands also allow the continued proliferation of heavy industry, which has an outside impact on resident health outcomes and quality of life.

**Frustratingly, the City's understanding of Georgetown continues to be completely out of sync with the reality on the ground. Much of the land the City has zoned as MML has - in reality - been full of mixed uses for decades.** For this reason, we ask that the City study updating the following areas from MML to zoning that does not allow heavy industry to proliferate, including UI, Mixed Use, and/or Commercial:

1. The entire area from Orcas St. to E Marginal Way and Corson Ave to 1st Ave S;
2. The Corson Building and Elysian Brewing located at the intersection of Airport Way S and Corson Ave S and Airport Way S and S Lucille St, respectively; and
3. Extend buffer zoning (UI, Commercial, or Mixed Use) along Airport Way S all the way to S Lucille St AND extend buffer zoning to the other side of Airport Way S all the way to the railroad. Current Mixed Use zoning proposals under Alternatives 2 and 4 only include one side of Airport Way S.
  - a. Along the added side of Airport Way S, consider UI so it preserves artist studios and allows for light industrial uses.

This is not a radical shift in industrial and maritime zoning practices. **It is simply truing up the zoning to reflect the reality of our neighbors who already live and conduct business there.** In addition, this would create a meaningful buffer zone between our residential areas, thriving commercial core, and heavy industry. This would also allow for more housing and more investment in the kinds of maker and artist studios that Georgetown prides itself on.

- A fundamental flaw of the DEIS process is that the accompanying mitigation measures are merely suggestions, and will not be put forward as binding legislation eventually passed by the City Council. **This means that impacted residents citywide are forced by the City to make decisions that will have substantive and lasting impacts on their health and wellbeing without any commitment from the City to solve those issues.** The City - when issuing the Final EIS - must send companion binding legislation to the City Council that codifies and funds recommended mitigation measures.
- The DEIS makes zoning changes that need accompanying policy commitments in order to maximize their impact. **For example, rezoning part of Airport Way from Industrial to Mixed Use has lots of potential benefits for the neighborhood. However, it requires accompanying policies from the City - such as commitments regarding historic preservation and affordable housing - to ensure the zoning changes align with the policy intent of the neighborhood, and don't exacerbate affordability and equity issues.** The City - when issuing the Final EIS - must send companion binding legislation to



the City Council that codifies and funds policy commitments that center affordability and equity alongside zoning changes.

- While we appreciate OPCD's recent work to come into our communities and talk directly with our impacted neighbors, overall, the engagement process for both the Industrial & Maritime Strategy and the DEIS has been deeply inadequate. **The policies being proposed and studied in the Strategy and DEIS impact every single resident, small business, and worker in and around the industrially zoned areas. However, the engagement process relied primarily on input from traditional stakeholders who have historically had access to power and influence.** The GCC supports the Duwamish River Community Coalition's request for a year-long extension to the DEIS to allow for meaningful engagement with impacted residents.

**For these reasons, the GCC calls on the City to fold the DEIS process into the Comprehensive Plan update, which is just beginning. There is an opportunity to make these issues accessible and compelling for residents across impacted communities. That approach must center language access, meeting people where they are, and community co-design.**

This approach aligns with the timing of the robust engagement plan proposed for the Comprehensive Plan update. It would allow the Industrial & Maritime Strategy to get the attention from the City and community that it deserves by being included in OPCD's well-designed [community outreach strategy](#).

Working together, we can create a holistic, sustainable, and community-driven industrial lands strategy that makes a real and lasting difference in entrenched challenges of affordability, environmental impacts, and equity across Seattle. The GCC remains ready to support these efforts.

Thank you for the opportunity to comment, and we look forward to the City's response.

Sincerely,

Greg Ramirez  
Chair  
Georgetown Community Council

Velma Veloria  
Chair

King County International Airport Community Coalition

**Holmes, Jim**

Letter #124

**From:** Kelsey Nyland <kelsnyland@gmail.com>  
**Sent:** Friday, April 15, 2022 3:40 PM  
**To:** PCD\_Industry\_and\_Maritime@seattle.gov  
**Cc:** Quirindongo, Rico; Harrell, Bruce; Harrell, Monisha; Burgess, Tim; McIntyre, Markham; Wong, Greg; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa; Georgetown Community Council; Wentlandt, Geoffrey; Holmes, Jim  
**Subject:** Comment on the Industrial & Maritime DEIS  
**Attachments:** 04.14.22 - GCC DEIS Comment.pdf

**CAUTION: External Email**

OPCD & City Leadership -

I hope you're all doing well! I'm writing to voice my support for the Georgetown Community Council's comment (attached) on the City's Industrial & Maritime DEIS. Most crucially, I support the GCC's call for the City to fold the Industrial & Maritime process into the Comprehensive Plan process, to better increase the chances for a robust, accessible, and equitable engagement effort on these zoning changes, which impact the lives of Georgetown residents and small businesses.

124-1

We have to pursue strategies that meaningfully address the neighborhood's goals of affordability, environmental justice and connectivity. The decisions we make through this effort will impact residents' health and wellbeing for generations.

I look forward to learning about next steps from the City.

Best,

Kelsey Nyland  
Georgetown resident for 4(ish) years

**Holmes, Jim**

Letter #125

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**From:** brooke rajcich <brookerajic@gmail.com>  
**Sent:** Thursday, April 14, 2022 8:41 PM  
**To:** PCD\_Industry\_and\_Maritime@seattle.gov; Wentlandt, Geoffrey; Holmes, Jim  
**Subject:** DEIS Comment  
**Attachments:** 04.14.22 - GCC DEIS Comment (1) (1).pdf

**CAUTION: External Email**

"I support the comment letter from the Georgetown Community Council and urge you to fold the DEIS process into the Comprehensive Plan update."

125-1



See Letter  
#96



April 15, 2022

Georgetown Community Council  
PO Box 80021  
Seattle, WA 98108

**RE: Comment on the Industrial & Maritime DEIS**

Dear OPCD Team,

The Georgetown Community Council (GCC), with endorsement from the King County International Airport Community Coalition (KCIACC) is writing to provide our feedback on the City of Seattle's Draft Environmental Impact Statement (DEIS) regarding the Industrial & Maritime Strategy. While the DEIS and Strategy make welcome adjustments to zoning practices and move a small pocket of land out of the Duwamish Manufacturing Industrial Center (MIC), these changes are ultimately marginal. The DEIS and overall Strategy fall significantly short of meeting the needs and priorities of Georgetown residents, small businesses, and workers.

Our comments are as follows:

- We are glad to see the updated zoning concepts put forward by OPCD. In particular, we believe the Urban Industrial (UI) zoning has the potential for increased affordability, sustainability, and equitable outcomes if pursued and implemented well by the City. It also offers potential opportunities for more connectivity and better protections between the residential and heavy industrial areas of our neighborhood.

**However, the areas of Georgetown that are zoned UI in the DEIS will make no material changes to the lives of neighborhood residents and small businesses for the foreseeable future.** The vast majority of land that is zoned UI is owned by organizations that likely have no intention to sell - now or in the future. Examples include (in Alternatives Two and Four):

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While the City claims that UI zoning can create more substantive buffers between Georgetown residents and heavy industry - a longtime request of the neighborhood - the choice of locations for the UI zoned areas are nominal. **In addition, there are other zoning options that the City does not allow residents to consider - like Commercial 2 - that would create functional buffer zones between residents and heavy industry AND more accurately capture what is already happening in the area than Maritime, Manufacturing, and Logistics (MML), UI, or Industry and Innovation (II) zoning.**

It is also worth noting that a significant amount of land that is currently zoned Commercial 2 (C2) in the neighborhood - surrounding the Airport Way S and S Hardy St intersection - is industrial in practice due to its use by or proximity to Boeing Field. Historically, when industry encroaches on residential and commercial spaces, the loss of non-industrial land is not made up for elsewhere. This practice must end. For this reason, it's crucial that the City study additional expansion of buffer zoning - including C2 and Mixed Use - throughout the neighborhood to mitigate against likely future losses in non-industrial land.

We wish to connect the entire neighborhood, not just the "Triangle" along Airport Way S between Corson Ave S and S Bailey St. The DEIS alternatives are effectively incomplete because they do not study the impacts of additional types of zoning other than the three put forward by OPCD. **We urge the City to create legitimate buffer zones between residences and heavy industry by extending the UI zones currently proposed in Alternatives Two and Four and by studying the impacts of other, non-industrial types of zoning. Fundamentally, Georgetown residents are looking for a decrease in MML zoning, as it creates adverse impacts to our health and quality of life.**

- At its most ambitious (Alternative Four), the DEIS still zones 87 percent of industrial land as MML, which represents only a three percent adjustment from current zoning. Lands zoned as MML cannot accommodate new affordable housing which, as the City knows, Georgetown and South Park stakeholders identified as a top issue that must be addressed in the Industrial & Maritime Strategy. These lands also allow the continued proliferation of heavy industry, which has an outside impact on resident health outcomes and quality of life.

**Frustratingly, the City's understanding of Georgetown continues to be completely out of sync with the reality on the ground. Much of the land the City has zoned as MML has - in reality - been full of mixed uses for decades.** For this reason, we ask that the City study updating the following areas from MML to zoning that does not allow heavy industry to proliferate, including UI, Mixed Use, and/or Commercial:

1. The entire area from Orcas St. to E Marginal Way and Corson Ave to 1st Ave S;
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  - a. Along the added side of Airport Way S, consider UI so it preserves artist studios and allows for light industrial uses.

This is not a radical shift in industrial and maritime zoning practices. **It is simply truing up the zoning to reflect the reality of our neighbors who already live and conduct business there.** In addition, this would create a meaningful buffer zone between our residential areas, thriving commercial core, and heavy industry. This would also allow for more housing and more investment in the kinds of maker and artist studios that Georgetown prides itself on.

- A fundamental flaw of the DEIS process is that the accompanying mitigation measures are merely suggestions, and will not be put forward as binding legislation eventually passed by the City Council. **This means that impacted residents citywide are forced by the City to make decisions that will have substantive and lasting impacts on their health and wellbeing without any commitment from the City to solve those issues.** The City - when issuing the Final EIS - must send companion binding legislation to the City Council that codifies and funds recommended mitigation measures.
- The DEIS makes zoning changes that need accompanying policy commitments in order to maximize their impact. **For example, rezoning part of Airport Way from Industrial to Mixed Use has lots of potential benefits for the neighborhood. However, it requires accompanying policies from the City - such as commitments regarding historic preservation and affordable housing - to ensure the zoning changes align with the policy intent of the neighborhood, and don't exacerbate affordability and equity issues.** The City - when issuing the Final EIS - must send companion binding legislation to

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**For these reasons, the GCC calls on the City to fold the DEIS process into the Comprehensive Plan update, which is just beginning. There is an opportunity to make these issues accessible and compelling for residents across impacted communities. That approach must center language access, meeting people where they are, and community co-design.**

This approach aligns with the timing of the robust engagement plan proposed for the Comprehensive Plan update. It would allow the Industrial & Maritime Strategy to get the attention from the City and community that it deserves by being included in OPCD's well-designed [community outreach strategy](#).

Working together, we can create a holistic, sustainable, and community-driven industrial lands strategy that makes a real and lasting difference in entrenched challenges of affordability, environmental impacts, and equity across Seattle. The GCC remains ready to support these efforts.

Thank you for the opportunity to comment, and we look forward to the City's response.

Sincerely,

Greg Ramirez  
Chair  
Georgetown Community Council

Velma Veloria  
Chair



King County International Airport Community Coalition

Holmes, Jim

Letter #126

**From:** Melina Rivera <rivera.melina@gmail.com>  
**Sent:** Friday, April 15, 2022 6:09 PM  
**To:** PCD\_Industry\_and\_Maritime@seattle.gov; Wentlandt, Geoffrey; Holmes, Jim; Morales, Tammy; Mosqueda, Teresa; Nelson, Sara  
**Subject:** Comment on the City's Industrial/Maritime Zoning Strategy  
**Attachments:** 04.14.22 - GCC DEIS Comment (1).pdf

CAUTION: External Email

Hello,

We are long time residents of Georgetown and I support the comment letter from the Georgetown Community Council and urge you to fold the DEIS process into the Comprehensive Plan update.

As residents of the Duwamish Valley, we continue to advocate for long-term strategies to address unfair environmental justice issues that continue to harm our community. The unfortunate truth is that our advocacy as neighbors doesn't compete with the lobbying power and resources that caters to industry. For example, historically, when industry encroaches on residential and commercial spaces, the loss of non-industrial land is not made up or replaced in our neighborhood. There is no real buffer between residents and heavy industry in this neighborhood.

Policies should be built by and with communities that are most impacted by climate change and environmental impacts. So many times, in my neighborhood, we feel that we are an afterthought. Our commentary and input is sought when a project is more than half-baked and when our input is the least valued. It's long overdue for the expertise of frontline communities to be valued and resourced.

I would like to see real efforts by our city government to create real and equitable community-driven solutions.

Thank you,

Melina Rivera and Matt Johnson  
Georgetown residents

126-1



April 15, 2022

Georgetown Community Council  
PO Box 80021  
Seattle, WA 98108

**RE: Comment on the Industrial & Maritime DEIS**

Dear OPCD Team,

The Georgetown Community Council (GCC), with endorsement from the King County International Airport Community Coalition (KCIACC) is writing to provide our feedback on the City of Seattle's Draft Environmental Impact Statement (DEIS) regarding the Industrial & Maritime Strategy. While the DEIS and Strategy make welcome adjustments to zoning practices and move a small pocket of land out of the Duwamish Manufacturing Industrial Center (MIC), these changes are ultimately marginal. The DEIS and overall Strategy fall significantly short of meeting the needs and priorities of Georgetown residents, small businesses, and workers.

Our comments are as follows:

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It is also worth noting that a significant amount of land that is currently zoned Commercial 2 (C2) in the neighborhood - surrounding the Airport Way S and S Hardy St intersection - is industrial in practice due to its use by or proximity to Boeing Field. Historically, when industry encroaches on residential and commercial spaces, the loss of non-industrial land is not made up for elsewhere. This practice must end. For this reason, it's crucial that the City study additional expansion of buffer zoning - including C2 and Mixed Use - throughout the neighborhood to mitigate against likely future losses in non-industrial land.

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**Frustratingly, the City's understanding of Georgetown continues to be completely out of sync with the reality on the ground. Much of the land the City has zoned as MML has - in reality - been full of mixed uses for decades.** For this reason, we ask that the City study updating the following areas from MML to zoning that does not allow heavy industry to proliferate, including UI, Mixed Use, and/or Commercial:

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- A fundamental flaw of the DEIS process is that the accompanying mitigation measures are merely suggestions, and will not be put forward as binding legislation eventually passed by the City Council. **This means that impacted residents citywide are forced by the City to make decisions that will have substantive and lasting impacts on their health and wellbeing without any commitment from the City to solve those issues.** The City - when issuing the Final EIS - must send companion binding legislation to the City Council that codifies and funds recommended mitigation measures.
- The DEIS makes zoning changes that need accompanying policy commitments in order to maximize their impact. **For example, rezoning part of Airport Way from Industrial to Mixed Use has lots of potential benefits for the neighborhood. However, it requires accompanying policies from the City - such as commitments regarding historic preservation and affordable housing - to ensure the zoning changes align with the policy intent of the neighborhood, and don't exacerbate affordability and equity issues.** The City - when issuing the Final EIS - must send companion binding legislation to

the City Council that codifies and funds policy commitments that center affordability and equity alongside zoning changes.

- While we appreciate OPCD's recent work to come into our communities and talk directly with our impacted neighbors, overall, the engagement process for both the Industrial & Maritime Strategy and the DEIS has been deeply inadequate. **The policies being proposed and studied in the Strategy and DEIS impact every single resident, small business, and worker in and around the industrially zoned areas. However, the engagement process relied primarily on input from traditional stakeholders who have historically had access to power and influence.** The GCC supports the Duwamish River Community Coalition's request for a year-long extension to the DEIS to allow for meaningful engagement with impacted residents.

**For these reasons, the GCC calls on the City to fold the DEIS process into the Comprehensive Plan update, which is just beginning. There is an opportunity to make these issues accessible and compelling for residents across impacted communities. That approach must center language access, meeting people where they are, and community co-design.**

This approach aligns with the timing of the robust engagement plan proposed for the Comprehensive Plan update. It would allow the Industrial & Maritime Strategy to get the attention from the City and community that it deserves by being included in OPCD's well-designed [community outreach strategy](#).

Working together, we can create a holistic, sustainable, and community-driven industrial lands strategy that makes a real and lasting difference in entrenched challenges of affordability, environmental impacts, and equity across Seattle. The GCC remains ready to support these efforts.

Thank you for the opportunity to comment, and we look forward to the City's response.

Sincerely,

Greg Ramirez  
Chair  
Georgetown Community Council

Velma Veloria  
Chair

King County International Airport Community Coalition

#7

Letter  
#127

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, April 15, 2022 12:44:21 PM  
**Last Modified:** Friday, April 15, 2022 12:45:53 PM  
**Time Spent:** 00:01:31  
**IP Address:** 24.16.228.177

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Page 1: Draft EIS Comment



**Q1**

After reviewing the Draft EIS, send us a comment to suggest how the analysis can be improved or any other concern or question you may have related to the Draft EIS.

Dear OPCD Team,

I'm writing to provide feedback on the City of Seattle's Draft Environmental Impact Statement (DEIS) including the Industrial and Maritime Strategy (IMS) proposal to rezone Georgetown and South Park. I am a resident of Seattle, a small business owner, and an active member of Equinox Studios in Georgetown. The Industrial and Maritime Strategy proposal is unacceptably flawed. I ask you to stop the planned rezone and instead bring Georgetown and South Park into the city's Comprehensive Plan with a process that incorporates authentic community engagement and input, and takes into consideration the rights and wellbeing of residents and the unique role that Georgetown and South Park play in the city's cultural life. 127-1

For the following reasons, the Industrial and Maritime Strategy is fundamentally and unacceptably flawed and must be rejected:

1. The IMS does not take into consideration and preserve Georgetown's critical role in Seattle's artistic and cultural life, especially in the realms of affordable studio and performance space. Georgetown is the last bastion of affordable art space in our city, where many artists and historical art spaces have already been pushed out. The IMS in its current form threatens not only the artistic community and vibrant cultural life of Georgetown but of the city as a whole. 127-2
2. The proposed zoning changes are based on an inaccurate description of Georgetown's current reality, and none of the proposed alternatives will materially improve the lives of residents and small business owners in the foreseeable future. Rather all alternatives reduce or eliminate potential affordable housing and lack zoning options that sufficiently buffer residential areas and the commercial core from heavy industry. 127-3
3. The IMS does not reflect needs identified by the Georgetown and South Park communities. The process of community engagement in development of the IMS was woefully insufficient, and the IMS reflects this lack of consideration towards existing communities, families, and small business. 127-4
4. The IMS privileges future growth of industrial and maritime usages over existing creative industries essential to city cultural life and proven to support and sustain local businesses. 127-5

I am requesting instead that, in any strategy going forward, the City:

1. Study the impacts of the IMS on vital arts and cultural resources in the district, including through an authentic community engagement process with artists and makers currently working in Georgetown and South Park. This study can draw on the extensive community input and processes conducted within these communities in recent years that are as yet underutilized. 127-6
2. Incorporate additional types of zoning beyond the three put forward by OPCD to create legitimate buffer zones between residences and heavy industry. This process requires studying the impacts of other, non-industrial types of zoning and must result in an overall decrease in MML zoning that creates adverse impacts to community health and quality of life. 127-7
3. Prioritize new affordable housing, a top issue identified by Georgetown and South Park stakeholders to be addressed in the Industrial & Maritime Strategy. 127-8
4. Update current zoning to reflect Georgetown's reality. Much of the land the City has zoned as MML has been full of mixed uses for decades in reality. The Georgetown Community Council has already identified those areas that need to be updated from MML to zoning that does not allow heavy industry to proliferate. The City's zoning must reflect these realities as the basis for any strategy going forward. 127-9
5. Study additional expansion of buffer zoning - including C2 and Mixed Use - throughout the neighborhood to mitigate against likely future losses in non-industrial land. 127-10
6. Create a meaningful buffer zone between residential areas, Georgetown's vibrant commercial core, and heavy industry. 127-11
7. Enact changes that allow for more housing and more investment in the artist and maker studios and performance spaces that currently characterize Georgetown's creative vitality and make its community such an essential part of the city's cultural life. 127-11
8. When issuing the Final EIS, send companion binding legislation to the City Council that codifies and funds recommended mitigation measures (rather than the current state in which mitigation measures are only suggestions) and policy commitments that 127-12

center affordability and equity alongside zoning changes.

9. Craft policies that include commitments to historic preservation and affordable housing to ensure that any zoning changes align with the policy intent of the neighborhood and don't further reduce affordability and inequities. 127-13

10. Engage the community in the process in a meaningful way. The engagement process for the IMS and DEIS thus far has been deeply inadequate. As the Georgetown Community Council has identified, the policies being proposed and studied in the IMS and DEIS impact every resident, small business, and worker in and around the industrially zoned areas. Yet engagement relied primarily on input from traditional stakeholders who have historically had access to power and influence. Going forward, make the issues accessible through active community engagement that includes language access and community co-design. Incorporation of Georgetown and South Park into the city's Comprehensive Plan would allow for inclusion via OPCD's community outreach strategy. 127-14

11. Support the Duwamish River Community Coalition's request for a year-long extension to the DEIS to allow for meaningful engagement with impacted residents. 127-15

All of the above can be accomplished by shifting the DEIS process into the city's Comprehensive Plan update, and the timing is right. Please take seriously the unique role that the Georgetown and South Park communities play, our wellbeing as residents, workers, and artists, and the opportunity we all have here to create an industrial lands strategy that is environmentally, equitably, and culturally vibrant and sustainable. 127-16

Sincerely,

Maureen Ryan

---

## Q2

Please provide your name and email address.

|               |                            |
|---------------|----------------------------|
| Name          | <b>Maureen Ryan</b>        |
| Email Address | <b>ambystomo@gmail.com</b> |

---

**Holmes, Jim**

Letter #128

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**From:** Andrew Schiffer <bricktree@hotmail.com>  
**Sent:** Friday, April 15, 2022 7:11 AM  
**To:** Wentlandt, Geoffrey; Holmes, Jim  
**Cc:** Harrell, Bruce; Wong, Greg; McIntyre, Markham; Harrell, Monisha; Quirindongo, Rico; Nelson, Sara; Mosqueda, Teresa; Burgess, Tim  
**Subject:** City of Seattle Industrial and Maritime DEIS Comment

**CAUTION: External Email**

Dear City of Seattle officials,

I am a Georgetown resident, and I love my neighborhood and Seattle. I support the Georgetown Community Council's comment letter on the Draft DEIS. Our main concerns include a lack of meaningful efforts to create buffers between residences and heavy industry, no commitment to environmental mitigation efforts, and no commitment to anti-displacement and affordability efforts. Overall, we believe the Industrial & Maritime changes should be folded into the broader, citywide planning update already underway. This effort is only just beginning, and would help ensure residents have a real seat at the table. We look forward to your response, and remain ready to collaborate on this effort.

128-1

Thanks,  
Andrew Schiffer  
Georgetown resident

Holmes, Jim

**From:** Ethan Smith <ethan.smith47@gmail.com>  
**Sent:** Friday, April 15, 2022 2:48 PM  
**To:** PCD\_Industry\_and\_Maritime@seattle.gov; Wentlandt, Geoffrey; Holmes, Jim  
**Subject:** Rico.Quirindongo@seattle.gov; Bruce.Harrell@seattle.gov; Monisha.Harrell@seattle.gov; Tim.Burgess@seattle.gov; Markham.Mcintyre@seattle.gov; Greg.Wong@seattle.gov; tammy.morales@seattle.gov; sara.nelson@seattle.gov; teresa.mosqueda@seattle.gov; directo...  
**Attachments:** 04.14.22 - GCC DEIS Comment (1).pdf

**CAUTION: External Email**

Dear OPCD,

I am a resident and homeowner in Georgetown. This neighborhood desperately needs more residential and commercial development and more insulation from the surrounding heavy industry. I am hopeful that changing current zoning to allow for this type of development, setting off a virtuous cycle that draws more residents, more businesses, more services, and more amenities. This will benefit Georgetown but also Seattle as a whole, which needs to maximize its urban residential neighborhoods to address the ongoing housing crisis.

129-1

I support the attached comment letter from the Georgetown Community Council and urge you to fold the DEIS process into the Comprehensive Plan update.

Thanks,  
 Ethan Smith



April 15, 2022

See #96

Georgetown Community Council  
PO Box 80021  
Seattle, WA 98108

**RE: Comment on the Industrial & Maritime DEIS**

Dear OPCD Team,

The Georgetown Community Council (GCC), with endorsement from the King County International Airport Community Coalition (KCIACC) is writing to provide our feedback on the City of Seattle’s Draft Environmental Impact Statement (DEIS) regarding the Industrial & Maritime Strategy. While the DEIS and Strategy make welcome adjustments to zoning practices and move a small pocket of land out of the Duwamish Manufacturing Industrial Center (MIC), these changes are ultimately marginal. The DEIS and overall Strategy fall significantly short of meeting the needs and priorities of Georgetown residents, small businesses, and workers.

Our comments are as follows:

- We are glad to see the updated zoning concepts put forward by OPCD. In particular, we believe the Urban Industrial (UI) zoning has the potential for increased affordability, sustainability, and equitable outcomes if pursued and implemented well by the City. It also offers potential opportunities for more connectivity and better protections between the residential and heavy industrial areas of our neighborhood.

**However, the areas of Georgetown that are zoned UI in the DEIS will make no material changes to the lives of neighborhood residents and small businesses for the foreseeable future.** The vast majority of land that is zoned UI is owned by organizations that likely have no intention to sell - now or in the future. Examples include (in Alternatives Two and Four):

- Land along Ellis Ave that is owned by King County (Boeing Field), which may actually pursue expansion into the residential areas in the coming years; and

- Land along Corson Ave that is owned by the Washington State Department of Transportation, South Seattle College, and the Puget Sound Industrial Excellence Center.

While the City claims that UI zoning can create more substantive buffers between Georgetown residents and heavy industry - a longtime request of the neighborhood - the choice of locations for the UI zoned areas are nominal. **In addition, there are other zoning options that the City does not allow residents to consider - like Commercial 2 - that would create functional buffer zones between residents and heavy industry AND more accurately capture what is already happening in the area than Maritime, Manufacturing, and Logistics (MML), UI, or Industry and Innovation (II) zoning.**

It is also worth noting that a significant amount of land that is currently zoned Commercial 2 (C2) in the neighborhood - surrounding the Airport Way S and S Hardy St intersection - is industrial in practice due to its use by or proximity to Boeing Field. Historically, when industry encroaches on residential and commercial spaces, the loss of non-industrial land is not made up for elsewhere. This practice must end. For this reason, it's crucial that the City study additional expansion of buffer zoning - including C2 and Mixed Use - throughout the neighborhood to mitigate against likely future losses in non-industrial land.

We wish to connect the entire neighborhood, not just the "Triangle" along Airport Way S between Corson Ave S and S Bailey St. The DEIS alternatives are effectively incomplete because they do not study the impacts of additional types of zoning other than the three put forward by OPCD. **We urge the City to create legitimate buffer zones between residences and heavy industry by extending the UI zones currently proposed in Alternatives Two and Four and by studying the impacts of other, non-industrial types of zoning. Fundamentally, Georgetown residents are looking for a decrease in MML zoning, as it creates adverse impacts to our health and quality of life.**

- At its most ambitious (Alternative Four), the DEIS still zones 87 percent of industrial land as MML, which represents only a three percent adjustment from current zoning. Lands zoned as MML cannot accommodate new affordable housing which, as the City knows, Georgetown and South Park stakeholders identified as a top issue that must be addressed in the Industrial & Maritime Strategy. These lands also allow the continued proliferation of heavy industry, which has an outside impact on resident health outcomes and quality of life.

**Frustratingly, the City's understanding of Georgetown continues to be completely out of sync with the reality on the ground. Much of the land the City has zoned as MML has - in reality - been full of mixed uses for decades.** For this reason, we ask that the City study updating the following areas from MML to zoning that does not allow heavy industry to proliferate, including UI, Mixed Use, and/or Commercial:

1. The entire area from Orcas St. to E Marginal Way and Corson Ave to 1st Ave S;
2. The Corson Building and Elysian Brewing located at the intersection of Airport Way S and Corson Ave S and Airport Way S and S Lucille St, respectively; and
3. Extend buffer zoning (UI, Commercial, or Mixed Use) along Airport Way S all the way to S Lucille St AND extend buffer zoning to the other side of Airport Way S all the way to the railroad. Current Mixed Use zoning proposals under Alternatives 2 and 4 only include one side of Airport Way S.
  - a. Along the added side of Airport Way S, consider UI so it preserves artist studios and allows for light industrial uses.

This is not a radical shift in industrial and maritime zoning practices. **It is simply truing up the zoning to reflect the reality of our neighbors who already live and conduct business there.** In addition, this would create a meaningful buffer zone between our residential areas, thriving commercial core, and heavy industry. This would also allow for more housing and more investment in the kinds of maker and artist studios that Georgetown prides itself on.

- A fundamental flaw of the DEIS process is that the accompanying mitigation measures are merely suggestions, and will not be put forward as binding legislation eventually passed by the City Council. **This means that impacted residents citywide are forced by the City to make decisions that will have substantive and lasting impacts on their health and wellbeing without any commitment from the City to solve those issues.** The City - when issuing the Final EIS - must send companion binding legislation to the City Council that codifies and funds recommended mitigation measures.
- The DEIS makes zoning changes that need accompanying policy commitments in order to maximize their impact. **For example, rezoning part of Airport Way from Industrial to Mixed Use has lots of potential benefits for the neighborhood. However, it requires accompanying policies from the City - such as commitments regarding historic preservation and affordable housing - to ensure the zoning changes align with the policy intent of the neighborhood, and don't exacerbate affordability and equity issues.** The City - when issuing the Final EIS - must send companion binding legislation to

the City Council that codifies and funds policy commitments that center affordability and equity alongside zoning changes.

- While we appreciate OPCD's recent work to come into our communities and talk directly with our impacted neighbors, overall, the engagement process for both the Industrial & Maritime Strategy and the DEIS has been deeply inadequate. **The policies being proposed and studied in the Strategy and DEIS impact every single resident, small business, and worker in and around the industrially zoned areas. However, the engagement process relied primarily on input from traditional stakeholders who have historically had access to power and influence.** The GCC supports the Duwamish River Community Coalition's request for a year-long extension to the DEIS to allow for meaningful engagement with impacted residents.

**For these reasons, the GCC calls on the City to fold the DEIS process into the Comprehensive Plan update, which is just beginning. There is an opportunity to make these issues accessible and compelling for residents across impacted communities. That approach must center language access, meeting people where they are, and community co-design.**

This approach aligns with the timing of the robust engagement plan proposed for the Comprehensive Plan update. It would allow the Industrial & Maritime Strategy to get the attention from the City and community that it deserves by being included in OPCD's well-designed [community outreach strategy](#).

Working together, we can create a holistic, sustainable, and community-driven industrial lands strategy that makes a real and lasting difference in entrenched challenges of affordability, environmental impacts, and equity across Seattle. The GCC remains ready to support these efforts.

Thank you for the opportunity to comment, and we look forward to the City's response.

Sincerely,

Greg Ramirez  
Chair  
Georgetown Community Council

Velma Veloria  
Chair



King County International Airport Community Coalition

**From:** Peter StJohn <peterstjohn@gmail.com>  
**Sent:** Tuesday, April 12, 2022 8:43 PM  
**To:** Wentlandt, Geoffrey; Holmes, Jim  
**Subject:** Industrial and Maritime DEIS - Georgetown Resident Commentary

**CAUTION: External Email**

Hello Mr. Wentlandt and Mr Holms,

As a resident of Georgetown I wanted to take the opportunity to provide comment on the proposed Industrial and Maritime land use changes within the Georgetown neighborhood.

As a parent of a four year old son living on the edge of an industrial zone I know well the dangers of commercial trucks covering sidewalks, train tracks unmaintained for years, and the pollution, garbage, and general lawlessness that thrives in industrial borders.

130-1

I also know the pain when the warehouse next door decides that beeping from 9a-5pm isn't enough and extends into nighttime hours, and the great fun of putting your child back to sleep after the train whistles loudly for minutes at an unprotected crossing at 3am.

Per the proposed changes:

**Urban Industrial Zoning:**

This is a great concept on paper, and I hope with some changes it can live up to what it is intended to be. While I most support proposal #4, I see the UI zoning change in Georgetown doing little to no good and possibly creating harm in it's current format.

130-2

If this zoning change only occurs the area currently outlined it will amount to a change in paper only. One I fear the maritime and industrial industry would use as a reason to not create other changes.

Rezoning the Georgetown playfield, or the WSDOT facility, or the community college will create no change in land use whatsoever.

–For real change the area of this rezoning needs to be significantly increased–

The streets bounded by – S. Brandon St, 2<sup>nd</sup> Ave S, S. Mead St, S. Fidalgo St. and 7<sup>th</sup> Ave S– would make a great addition. They have held residential in the past and should again.

There must be an expansion of this rezoning and a look at what parcels might actually see redevelopment for this adjustment to create positive impact. Seeing my neighbors' single family homes on Orcas as a spot of industrial even in the updated map tells me these maps were made without real understanding of what currently exists on these sites.

**Mixed Use Zoning**

This is a huge win. Rezoning the Georgetown triangle would be fantastic.

130-3

That said, the railroad spur has to go. The crossings are fully unmaintained, unprotected, and an absolute disaster. They are dangerous for cars, children, bikes, people in wheelchairs – and generally everything in the neighborhood. This is a short retracking spur – it can certainly be shut down.

**Overall:**

I am happy to see innovative solutions being brought to increase residential density while protecting a real need for industrial businesses. Creating high density areas with light industrial would serve to create a true buffer for residents, whereas the current industrial buffer zoning does not. To be successful the area of rezoning – and associated development – must increase.

Thank you for considering my comments,

–Peter St. John

707 S Homer St.

#6

Letter #131

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, April 15, 2022 10:50:27 AM  
**Last Modified:** Friday, April 15, 2022 10:51:18 AM  
**Time Spent:** 00:00:50  
**IP Address:** 50.228.38.112

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Page 1: Draft EIS Comment

**Q1**

After reviewing the Draft EIS, send us a comment to suggest how the analysis can be improved or any other concern or question you may have related to the Draft EIS.

To Whom It May Concern,

I am a working artist with a small business located in Georgetown. My business, Studio SixEight ([www.studiosixeight.com](http://www.studiosixeight.com)), is located within the larger community of artists known as Equinox Studios ([www.equinoxstudios.org](http://www.equinoxstudios.org)). The Equinox Studios complex comprises most of the 5th Avenue South block just south of Michigan Street, as well as several other small outposts throughout Georgetown. We acknowledge that we are located on traditional lands once occupied by the Coast Salish people.

I create art, as well as serving other artists in and around the Seattle and Puget Sound region through my business of printing large-format fine art prints and giclees. Most of us are now located in Georgetown because we have been displaced from other areas in Seattle that are no longer affordable for artists to live and work ... in what was once a vibrant art and cultural scene throughout Seattle.

131-1

Regarding Industrial and Maritime Strategy proposal to rezone Georgetown and South Park, all of the proposed alternatives should be REJECTED for the following reasons:

- Insufficient study of impacts on the community-at-large, including existing arts, artists, and cultural resources in the district.
- All proposed mitigations need to be addressed more specifically. In most cases, they are too general, with no clear delineation of how the mitigations would be brought to fruition, nor is there any guarantee that the mitigations would be manifested as promised in the "outcomes."
- Lack of consideration towards existing communities, families, and small business - artists and otherwise.
- Proposals favor future growth of industrial and maritime usages over existing creative industries, which are proven to support and sustain local businesses.
- Under the guise of promising jobs, existing communities, including artists, their workspaces and businesses, and the cultural life of Seattle, are threatened.
- Of great concern is the Draft EIS's own assertion that "GIS maps document a variety of historic and cultural resources in the study area." Also, "There is a potential for alteration, damage, or destruction of resources present under all alternatives."
- The Duwamish River Community Coalition points out: "The environmental impact analysis is narrow and does not fully address core principles related to environmental justice and a fair community-driven process."

131-2

131-3

131-4

131-5

131-6

There are too many "holes" still left unanswered and the entire process needs much more discussion and engagement.

In general, there seems to be an indifference to the increased impact of each ensuing alternative that is proposed. "This thing will happen, resulting in this impact ... Oh well, that can fixed." But HOW? And what if it can't be or isn't fixed? Then what? Will city planners shrug their shoulders and walk away, while the folks who live, work, and create here are left to deal with the results ... and/or are potentially displaced once again?

131-7

I ask you to reconsider this entire proposal with a much broader view that includes the entire artistic and cultural community. It is simply unacceptable as it now stands.

Addendum, from <https://storymaps.arcgis.com/collections/b7d5f3183c924ace99b69d2e094a4303?item=7>:

Historic, Archeological, and Cultural Resources

To analyze historic, archeological, and cultural resources we used a wide variety of sources to obtain information on the environmental, archeological, and historical backgrounds of the study area and developed contexts for analysis. This data included information from the King County Assessors website, the Department of Archaeology and Historic Preservation's online database, the Washington Information System for Architectural and Archeological Records Data, and the City's landmark list. All the alternatives have the potential to affect districts, sites, buildings, structures, or objects (BSO's) that have been listed in historic registers or are determined eligible for listing. Additionally, the alternatives could potentially affect the numerous BSOs and undiscovered archaeological sites that have yet to be surveyed and assessed for eligibility to the National Register of Historic Places. For analysis, discussion, and mitigation strategies see Section 3.11 .

131-8

Thank you for your time and consideration,

M. Anne Sweet

[anne@studiosixeight.com](mailto:anne@studiosixeight.com)

[www.studiosixeight.com](http://www.studiosixeight.com)

**Q2**

Please provide your name and email address.

Name

**M. Anne Sweet**

Email Address

**anne@studiosixeight.com**

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#5

Letter #132

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, April 15, 2022 7:20:45 AM  
**Last Modified:** Friday, April 15, 2022 7:36:34 AM  
**Time Spent:** 00:15:49  
**IP Address:** 73.109.45.254

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Page 1: Draft EIS Comment

**Q1**

After reviewing the Draft EIS, send us a comment to suggest how the analysis can be improved or any other concern or question you may have related to the Draft EIS.

As the owner of a small creative business in Georgetown, I urge you to reject all of the alternatives presented. We have a valuable and growing arts community and a need for affordable housing, both of which deserve highest priority to maintain our unique community and culture.

132-1

**Q2**

Please provide your name and email address.

Name **Andrea Terrenzio**  
Email Address **dolcettachocolate@gmail.com**

---



Holmes, Jim

Letter #133

**From:** JT <lostlimbstudios@gmail.com>  
**Sent:** Thursday, April 14, 2022 10:34 PM  
**To:** PCD\_Industry\_and\_Maritime@seattle.gov; Wentlandt, Geoffrey; Holmes, Jim; Quirindongo, Rico; Harrell, Bruce; Harrell, Monisha; Burgess, Tim; McIntyre, Markham; Wong, Greg; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa  
**Subject:** Environmental Justice and Zoning - Georgetown Community

CAUTION: External Email

I support the comment letter from the Georgetown Community Council, and urge you to fold the DEIS process into the Comprehensive Plan update.

Community and industry can co-exist, but there must be environmental justice and protections against the profound impacts of industry on the community - our lives are literally at stake with the decisions being made.

133-1

How would you feel if your families and loved ones were living in the Duwamish Valley?

Sincerely,  
Joanne Tilley

**Holmes, Jim**

Letter #134

See Letter #97

**From:** Velma Veloria <rosete80@gmail.com>  
**Sent:** Friday, April 15, 2022 5:25 PM  
**To:** Sam Farrazaino  
**Cc:** Harrell, Bruce; Georgetown Community Council; Greg Ramirez; Wong, Greg; Holmes, Jim; McIntyre, Markham; Harrell, Monisha; paulina; Quirindongo, Rico; Burgess, Tim; Wentlandt, Geoffrey; Nelson, Sara; Morales, Tammy; Mosqueda, Teresa  
**Subject:** Re: Industrial And Maritime Strategy DEIS Comments

**CAUTION: External Email**

Great Lester. Thank you for sharing, Sam. KCIACC also signed on the Coalition letter.

134-1

Velma

On Fri, Apr 15, 2022 at 4:42 PM Sam Farrazaino <[sam@equinoxunlimited.com](mailto:sam@equinoxunlimited.com)> wrote:

Dear OPCD Team, Mayor Harrell, and City Leadership,

Thank you for the opportunity to comment on the Industrial and Maritime Strategy Draft Environmental Impact Statement.

Please find my comments attached.

We can do better as a City and I look forward to the trust and relationship building that this process has started!

**Samuel Farrazaino**

**Equinox Development Unlimited LLC**

Creating space for limitless possibilities

206.890.3283

[sam@equinoxunlimited.com](mailto:sam@equinoxunlimited.com)

--

Velma Veloria

Former Washington State Representative

Holmes, Jim

Letter #135

**From:** Maya White <maya.june@outlook.com>  
**Sent:** Friday, April 15, 2022 5:29 PM  
**To:** PCD\_Industry\_and\_Maritime@seattle.gov  
**Cc:** Quirindongo, Rico; Harrell, Bruce; Harrell, Monisha; Burgess, Tim; McIntyre, Markham; Wong, Greg; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa; Georgetown Community Council; Wentlandt, Geoffrey; Holmes, Jim  
**Subject:** Comment on the Industrial & Maritime DEIS  
**Attachments:** 04.14.22 - GCC DEIS Comment.pdf

**CAUTION: External Email**

Hello OPCD & City Leadership,

My name is Maya, and I am a long-term resident of Georgetown. I'm writing to voice my support for the Georgetown Community Council's comment (attached) on the City's Industrial & Maritime DEIS. Most crucially, I support the GCC's call for the City to fold the Industrial & Maritime process into the Comprehensive Plan process, to better increase the chances for a robust, accessible, and equitable engagement effort on these zoning changes, which impact the lives of Georgetown residents and small businesses.

135-1

We have to pursue strategies that meaningfully address the neighborhood's goals of affordability, environmental justice, and connectivity. The decisions we make through this effort will impact residents' health and wellbeing for generations.

I look forward to learning about next steps from the City.

Very best,

Maya J. White | 312-498-3529  
she/her



See Letter  
#96

April 15, 2022

Georgetown Community Council  
PO Box 80021  
Seattle, WA 98108

**RE: Comment on the Industrial & Maritime DEIS**

Dear OPCD Team,

The Georgetown Community Council (GCC), with endorsement from the King County International Airport Community Coalition (KCIACC) is writing to provide our feedback on the City of Seattle's Draft Environmental Impact Statement (DEIS) regarding the Industrial & Maritime Strategy. While the DEIS and Strategy make welcome adjustments to zoning practices and move a small pocket of land out of the Duwamish Manufacturing Industrial Center (MIC), these changes are ultimately marginal. The DEIS and overall Strategy fall significantly short of meeting the needs and priorities of Georgetown residents, small businesses, and workers.

Our comments are as follows:

- We are glad to see the updated zoning concepts put forward by OPCD. In particular, we believe the Urban Industrial (UI) zoning has the potential for increased affordability, sustainability, and equitable outcomes if pursued and implemented well by the City. It also offers potential opportunities for more connectivity and better protections between the residential and heavy industrial areas of our neighborhood.

**However, the areas of Georgetown that are zoned UI in the DEIS will make no material changes to the lives of neighborhood residents and small businesses for the foreseeable future.** The vast majority of land that is zoned UI is owned by organizations that likely have no intention to sell - now or in the future. Examples include (in Alternatives Two and Four):

- Land along Ellis Ave that is owned by King County (Boeing Field), which may actually pursue expansion into the residential areas in the coming years; and

- Land along Corson Ave that is owned by the Washington State Department of Transportation, South Seattle College, and the Puget Sound Industrial Excellence Center.

While the City claims that UI zoning can create more substantive buffers between Georgetown residents and heavy industry - a longtime request of the neighborhood - the choice of locations for the UI zoned areas are nominal. **In addition, there are other zoning options that the City does not allow residents to consider - like Commercial 2 - that would create functional buffer zones between residents and heavy industry AND more accurately capture what is already happening in the area than Maritime, Manufacturing, and Logistics (MML), UI, or Industry and Innovation (II) zoning.**

It is also worth noting that a significant amount of land that is currently zoned Commercial 2 (C2) in the neighborhood - surrounding the Airport Way S and S Hardy St intersection - is industrial in practice due to its use by or proximity to Boeing Field. Historically, when industry encroaches on residential and commercial spaces, the loss of non-industrial land is not made up for elsewhere. This practice must end. For this reason, it's crucial that the City study additional expansion of buffer zoning - including C2 and Mixed Use - throughout the neighborhood to mitigate against likely future losses in non-industrial land.

We wish to connect the entire neighborhood, not just the "Triangle" along Airport Way S between Corson Ave S and S Bailey St. The DEIS alternatives are effectively incomplete because they do not study the impacts of additional types of zoning other than the three put forward by OPCD. **We urge the City to create legitimate buffer zones between residences and heavy industry by extending the UI zones currently proposed in Alternatives Two and Four and by studying the impacts of other, non-industrial types of zoning. Fundamentally, Georgetown residents are looking for a decrease in MML zoning, as it creates adverse impacts to our health and quality of life.**

- At its most ambitious (Alternative Four), the DEIS still zones 87 percent of industrial land as MML, which represents only a three percent adjustment from current zoning. Lands zoned as MML cannot accommodate new affordable housing which, as the City knows, Georgetown and South Park stakeholders identified as a top issue that must be addressed in the Industrial & Maritime Strategy. These lands also allow the continued proliferation of heavy industry, which has an outside impact on resident health outcomes and quality of life.

**Frustratingly, the City's understanding of Georgetown continues to be completely out of sync with the reality on the ground. Much of the land the City has zoned as MML has - in reality - been full of mixed uses for decades.** For this reason, we ask that the City study updating the following areas from MML to zoning that does not allow heavy industry to proliferate, including UI, Mixed Use, and/or Commercial:

1. The entire area from Orcas St. to E Marginal Way and Corson Ave to 1st Ave S;
2. The Corson Building and Elysian Brewing located at the intersection of Airport Way S and Corson Ave S and Airport Way S and S Lucille St, respectively; and
3. Extend buffer zoning (UI, Commercial, or Mixed Use) along Airport Way S all the way to S Lucille St AND extend buffer zoning to the other side of Airport Way S all the way to the railroad. Current Mixed Use zoning proposals under Alternatives 2 and 4 only include one side of Airport Way S.
  - a. Along the added side of Airport Way S, consider UI so it preserves artist studios and allows for light industrial uses.

This is not a radical shift in industrial and maritime zoning practices. **It is simply truing up the zoning to reflect the reality of our neighbors who already live and conduct business there.** In addition, this would create a meaningful buffer zone between our residential areas, thriving commercial core, and heavy industry. This would also allow for more housing and more investment in the kinds of maker and artist studios that Georgetown prides itself on.

- A fundamental flaw of the DEIS process is that the accompanying mitigation measures are merely suggestions, and will not be put forward as binding legislation eventually passed by the City Council. **This means that impacted residents citywide are forced by the City to make decisions that will have substantive and lasting impacts on their health and wellbeing without any commitment from the City to solve those issues.** The City - when issuing the Final EIS - must send companion binding legislation to the City Council that codifies and funds recommended mitigation measures.
- The DEIS makes zoning changes that need accompanying policy commitments in order to maximize their impact. **For example, rezoning part of Airport Way from Industrial to Mixed Use has lots of potential benefits for the neighborhood. However, it requires accompanying policies from the City - such as commitments regarding historic preservation and affordable housing - to ensure the zoning changes align with the policy intent of the neighborhood, and don't exacerbate affordability and equity issues.** The City - when issuing the Final EIS - must send companion binding legislation to

the City Council that codifies and funds policy commitments that center affordability and equity alongside zoning changes.

- While we appreciate OPCD's recent work to come into our communities and talk directly with our impacted neighbors, overall, the engagement process for both the Industrial & Maritime Strategy and the DEIS has been deeply inadequate. **The policies being proposed and studied in the Strategy and DEIS impact every single resident, small business, and worker in and around the industrially zoned areas. However, the engagement process relied primarily on input from traditional stakeholders who have historically had access to power and influence.** The GCC supports the Duwamish River Community Coalition's request for a year-long extension to the DEIS to allow for meaningful engagement with impacted residents.

**For these reasons, the GCC calls on the City to fold the DEIS process into the Comprehensive Plan update, which is just beginning. There is an opportunity to make these issues accessible and compelling for residents across impacted communities. That approach must center language access, meeting people where they are, and community co-design.**

This approach aligns with the timing of the robust engagement plan proposed for the Comprehensive Plan update. It would allow the Industrial & Maritime Strategy to get the attention from the City and community that it deserves by being included in OPCD's well-designed [community outreach strategy](#).

Working together, we can create a holistic, sustainable, and community-driven industrial lands strategy that makes a real and lasting difference in entrenched challenges of affordability, environmental impacts, and equity across Seattle. The GCC remains ready to support these efforts.

Thank you for the opportunity to comment, and we look forward to the City's response.

Sincerely,

Greg Ramirez  
Chair  
Georgetown Community Council

Velma Veloria  
Chair

King County International Airport Community Coalition



**From:** Anita Woo <Anita@georgetowninnseattle.com>  
**Sent:** Thursday, April 14, 2022 9:45 PM  
**To:** Wentlandt, Geoffrey; Holmes, Jim  
**Subject:** Georgetown Inn DEIS Comment

**CAUTION: External Email**

Dear Office of Planning and Community Development:

Thank you for the opportunity to comment on the City of Seattle’s Draft Environmental Impact Statement for the Industrial and Maritime Strategy. Alternatives 3 and 4 in the DEIS present zoning options for the Georgetown neighborhood that could have significant impacts to my business and the larger community.

My family built and opened the Georgetown Inn more than 30 years ago and since then, the 52-room boutique hotel has become a fixture within Seattle’s oldest neighborhood. Situated on the corner of Corson Avenue and Michigan Street, the hotel’s myriad clientele includes workers from the commercial and industrial sectors, domestic and international travelers, locals attending stadium events, visiting artists and musicians, and patients of the nearby VA Hospital. Our business has always fostered a diverse community spirit from the guests we welcome into our hotel to the hard-working staff we employ. As a minority and woman-owned business with a staff comprised entirely of women and/or people of color, diversity and inclusion are always top of mind. And when planning for the future of Georgetown, we are planning for the people who live, work, and play here for generations to come.

136-1

The DEIS proposes zoning changes that could create opportunities for more housing affordability, environmental sustainability, and economic development with positive outcomes for all. However, under Alternatives 3 and 4, I would like to request further review and consideration of the following:

- Extend the mixed-use zone to include the adjacent land located between Harney Street, Corson Avenue and Bailey Street. The Georgetown Inn, which sits on this land, has made significant investments in the neighborhood for more than 30 years and now as a second-generation owner, I would like our hotel to continue to be a part of the community’s growing vision. A mixed-use designation allows greater potential for our property’s future expansion that could further contribute to the neighborhood’s goals as well as the objectives of the City’s comprehensive land use plan.
- Provide an explanation of development standards for “mixed-use” within the land use concept comparison. The final EIS should include a column explaining the mixed-use standards alongside the other concepts especially as it pertains to Georgetown. For example, acknowledge any building height parameters or restrictions due to proximity to the airport.
- Furthermore, while rezoning parts of Georgetown to mixed use offers many potential benefits, it requires accompanying policies from the City to ensure adequate historic preservation, affordability and sustainability. The final EIS should include additional policy recommendations and commitments that support these important neighborhood values.

136-2

The Georgetown Inn has evolved with the community over the past three decades, championing the emergence of new businesses --- restaurants, retail, wineries, breweries, entertainment venues, maker

spaces, and art galleries all of which have contributed to Georgetown's vibrant, eclectic urban personality. Rezoning presents an exciting opportunity to continue this evolution into a thriving neighborhood for the businesses, workers, and residents who call Georgetown home.

Once again, thank you for the opportunity to share my thoughts. I would like to continue this dialogue regarding the City's Industrial and Maritime strategy and look forward to the City's response.

Sincerely,

Anita Woo  
Owner and General Manager  
Georgetown Inn

[anita@georgetowninnseattle.com](mailto:anita@georgetowninnseattle.com)  
206-795-1602

Holmes, Jim

**From:** Laura Wright <lauracwright@hotmail.com>  
**Sent:** Friday, April 15, 2022 8:18 PM  
**To:** PCD\_Industry\_And\_Maritime\_Strategy; Wentlandt, Geoffrey; Holmes, Jim  
**Cc:** Quirindongo, Rico; Harrell, Bruce; Harrell, Monisha; Burgess, Tim; McIntyre, Markham; Wong, Greg; Morales, Tammy; Nelson, Sara; Mosqueda, Teresa; directors@georgetownneighborhood.com  
**Subject:** Comment on the City's industrial maritime zoning strategy.  
**Attachments:** Final+Joint+Draft+EIS+Comment+Letter+DRCC+to+OPCD+-+April+15+2022-2.pdf

CAUTION: External Email

Dear Geoffrey and Jim,

Please accept my comments for the city's Industry and Maritime Strategy. I acknowledge that my comments are submitted 3 hours after the deadline, a deadline which you have extended twice, but as a teacher it has been a difficult school year and I have been unable to get to my email until this time. I would also like to note that as difficult as it was for me to get this to you, I benefit from many privileges that many of my neighbors do not benefit from. Although many of my community members spend countless hours trying to empower the residents of the Duwamish Valley, I call on the City of Seattle to do its part in enacting a more thorough and inclusive effort that aligns with social, environmental, housing, and economic justice practices for which the Duwamish Valley deserves.

**I support the comment letter from the Georgetown Community Council and urge you to fold the DEIS process into the Comprehensive Plan update.** I have attached the letter to this email for your convenience. As a resident of Georgetown for 24 years, and a someone who has been active with many of the groups authoring this position, I can say it reflects the experiences and/ or viewpoints of myself and a large part of our commmunitymembers.

Thank you for your time and consideration.

Sincerely,

Laura Wright

137-1



See Letter #97

April 15, 2022

City of Seattle  
Office of Planning and Community Development (OPCD)  
Via email PCD\_Industry\_And\_Maritime\_Strategy@seattle.gov

RE: Industrial and Maritime Strategy Draft Environmental Impact Statement

Dear Office of Planning & Community Development (OPCD):

Thank you for the opportunity to comment on the City of Seattle's Industrial and Maritime Strategy Draft Environmental Impact Statement. This letter is submitted on behalf of the Duwamish River Community Coalition, in collaboration with Georgetown Community Council (GCC), King County International Community Coalition (KCIACC), Duwamish Valley Safe Streets (DVSS), and the Duwamish Valley Affordable Housing Coalition (DVAHC).<sup>1</sup> We write to express our collective concerns regarding the Draft Environmental Impact Statement (DEIS) analysis, proposed land use updates, and community engagement process since its inception. From our world view, the DEIS is deeply connected to the history of white settlement, heavy industrialization, and discriminatory housing policies that have left the Duwamish Valley community fighting for the advancement of environmental and climate justice for decades to come. The City must remain accountable to its actions and prioritize the wellbeing of the Duwamish Valley community over industry and profit in the Industrial and Maritime Strategy.

The Industrial and Maritime Strategy is an opportunity for the City of Seattle to right the wrongs set forth by the white settlement and early industrialists of the Seattle area, an issue of zoning and land use change. In addition, the strategy presents a unique opportunity for the City to reconfigure processes for on-going, low-barrier, multilingual community engagement regarding land use updates for a more inclusive and fair engagement process. More so, the Industrial and Maritime Strategy should not move forward independently of the Comprehensive Plan, Seattle Transportation Plan and Freight Master planning.

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<sup>1</sup> *The Duwamish River Community Coalition. DRCC/TAG is a non-profit that seeks to amplify and lift up the voices of the Duwamish River Valley community members, specifically those most harmed by the combined impacts of climate change, health disparities, and environmental and economic inequities. DRCC/TAG's mission is to elevate the voices of those impacted by Duwamish River pollution and other environmental injustices to advocate for a clean, healthy, and equitable environment for people and wildlife.*

While we are glad OPCD granted two extensions for public comment, including a special accommodation for Duwamish Valley neighbors, the community engagement process remained insufficient. For a community facing a myriad of intersecting challenges we advocated for full authentic community engagement as stated in the City of Seattle Duwamish Valley Program's environmental justice guiding principles and the Duwamish Valley Program's racial equity outcomes to avoid perpetuating the very injustices and inequalities in the Duwamish Valley.<sup>2</sup> The insufficiency also holds communities' frustration towards the City of Seattle's disregard of long-standing advocacy on issues, such as industrial pollution, that remain unresolved and will be made worse by an increasing population and activities proposed by the Industrial and Maritime Strategy (Alternatives 3 and 4).

While we champion workforce development and new housing opportunities for moderate to very low-income neighbors, existing environmental and health disparities must be eliminated before passing a strategy that will increase the number of residents who are exposed to environmental hazards, perpetuating the disproportionate exposure to environmental pollution in our geography. **To do this, we strongly urge the City to move legislation forward that increases environmental regulation standards, defines cumulative impacts and ensures all mitigation measures in the DEIS will be implemented without challenge.**

**To protect and support industry and Port operations without procedural justice and higher environmental standards for the residential communities of South Park and Georgetown ignores the reality of today and should not be acceptable to any of us.** In this way, the DEIS is not separate from the history of the Duwamish River and the vibrant communities in its proximity. Thus, land use planning must prioritize the recommendations made by the long standing communities that have borne the burden of industrialization in the City of Seattle for generations.

**The Duwamish river is a living reflection of what the City has been as well as who and what the City of Seattle can be.** This letter first explains why strong environmental standards and meaningful engagement of the diverse Duwamish Valley community is necessary to eliminate negative cumulative health impacts experienced everyday, and why the DEIS must check the integrity of its data analysis and mitigation measures to eliminate bias and injustice towards a community that has long been affected by racism rooted in environmental and land use planning and policy.

## ANALYSIS

### I. THE DEIS MUST ACKNOWLEDGE THE HISTORY OF SEATTLE AND THE INDUSTRIALIZATION OF THE DUWAMISH RIVER

Until the 20th century, the Duwamish River was a rich, meandering river with areas of mudflats and marshes. In the early 1900s, the lower section of the river was straightened and dredged for industrial development. By the 1940s, channelization had transformed a 9-mile estuary into the 5 miles we know today was the Duwamish River, a

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<sup>2</sup> [http://greenspace.seattle.gov/wp-content/uploads/2018/06/DuwamishValleyActionPlan\\_June2018.pdf](http://greenspace.seattle.gov/wp-content/uploads/2018/06/DuwamishValleyActionPlan_June2018.pdf)

Superfund Site.<sup>3</sup> More than 97% of the wildlife habitat that existed in the Duwamish River was destroyed. During this same time period, the City of Seattle was a segregated city; racial restrictive covenants and deed restrictions compounded by systems of discrimination prevented Black, Indigenous, Asian Americans, Pacific Islanders, Hispanic and Latino populations from renting, buying or occupying property in most parts of the city.<sup>4</sup> Because of this, nonwhite Seattle neighbors were locked into census tracts of South Seattle and this residential pattern remains well established today.

The significance of including the history of the Duwamish River and segregation in the City of Seattle is to shed light on the intersectional nature of land use and zoning change and its role in discriminatory practices that still impact Seattle today. Therefore, the DEIS disregards its responsibility to respond to the pollution disparities caused by decades of exclusionary land use decisions and harm done to communities of color. This history is woefully underscored in the DEIS, lacking honest accountability for past harms still impacting community today.

**Because of this, we view the DEIS as a process with serious implications that cannot be rushed and must undergo rigorous community review, environmental and public health analysis to ensure decisions do not leave neighborhoods like the Duwamish Valley highly exposed to environmental hazards, odors, noise, traffic and unfair opportunities to engage in decision-making processes during a global pandemic.**

New research from the University of Washington and the University of California at Berkeley explains how residents in communities like the Duwamish Valley are exposed to greater levels of significant air pollutants compared to communities living in Home Owners' Loan Corporation (HOLC) better-graded sections of the same city.<sup>5</sup> The census tracts in the Duwamish Valley are ranked highest in the state for diesel NOx pollution and disproportionate burden.<sup>6</sup>

Despite emerging research, long-standing community advocacy for strong environmental standards and consideration of cumulative impacts, the DEIS continues to move forward without resolution for stronger environmental standards that will increase health equity for current and future Duwamish Valley residents.

**If the City of Seattle moves forward with the Industrial and Maritime Strategy, comprehensive rules for increased environmental standards and protections from displacement driven by market forces must be enacted before its adoption. In addition, UI areas must be expanded to buffer, strengthen preservation of homes and prevent future displacement of neighbors who deserve equitable access to the benefits of nature.**

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<sup>3</sup><https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-sites/Lower-Duwamish-Waterway/Site-history>

<sup>4</sup> [https://depts.washington.edu/civilr/segregation\\_maps.htm](https://depts.washington.edu/civilr/segregation_maps.htm)

<sup>5</sup> <https://pubs.acs.org/doi/10.1021/acs.estlett.1c01012>

<sup>6</sup> Wash. Dep't of Health, Env't Health Disparities Map <https://fortress.wa.gov/doh/wtnibl/WTNIBL/> (Diesel Pollution and Disproportionate Impact").

## II. THE DEIS EQUITY, ENVIRONMENTAL JUSTICE ANALYSIS, AND MITIGATION RECOMMENDATIONS ARE BIASED AND INCOMPLETE

Today, the Duwamish Valley is a predominantly non-white, “near port”, and environmental justice community along the Duwamish River in Seattle. Large swaths of the Duwamish Valley are in the top 5% of communities nationwide with the highest proximity to traffic and traffic volume, and highest exposure to diesel PM pollution.<sup>7</sup> In addition, the Duwamish Valley Youth-led Moss Study found “hotspot” areas where high levels of ambient arsenic, chromium, nickel, cobalt exist.<sup>8</sup>

The DEIS concentrates solely on land use change and ignores a deep consideration for justice and intersectionality of community health and well-being. The equity and environmental justice analysis does not adequately reflect current public health data or incorporate community driven research stories into its data review. **Because of this, the authentic experiences of living in the Duwamish Valley in close proximity to industry are excluded, presenting a bias of how the information in the DEIS was collected, analyzed, interpreted and presented. In addition, existing data evaluated within the DEIS is inaccurate and must be addressed before moving forward to ensure credibility.**

Examples of inaccuracy include:

### A. Public space:

*“In Georgetown and South Park neighborhoods (within and outside of the Georgetown portion of the Greater Duwamish MIC) access to public space is comparable and, in some cases, better than the City as a whole. Georgetown and South Park scored 77 and 80 (Public Space Access Score out of 100) respectively in comparison to Seattle which scored 73.”<sup>9</sup>*

Data points on public space paint a false picture and correlates with concerns regarding active transportation. The neighborhoods of South Park and Georgetown are surrounded by highways, centered in the heart of Seattle's freight corridor. In this way, access to public space is highly limited and often a risk to public safety. While community projects are underway, Georgetown and South Park have some of the lowest tree canopy coverage in Seattle and many existing parks remain inaccessible due to contamination cleanup and lack of welcoming infrastructure.

None of these alternatives aim to base their approach on a regenerative model of planning. None of them are rooted in the needs of the land and healing a space that remains a home to our cities most vulnerable in terms of both people and nature. Seattle has made great promises within the City's Equity and Environment Agenda and these alternatives fall short in all areas of this identified agenda.

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<sup>7</sup> U.S. Env't'l Pro. Agency, EJScreen 2.0, <https://ejscreen.epa.gov/mapper/> (“People of Color” Socioeconomic Indicator).

<sup>8</sup> <https://static1.squarespace.com/static/5d744c68218c867c14aa5531/t/5f10f3cae34eb20502407d57/1594946507283/Duwamish+moss+Fact+Sheet+final.pdf>

<sup>9</sup> Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.12, page 3-477

**B. Air Particulates:** Dust impacts from increased VMT in the area is not covered in the DEIS.

The soils in the Duwamish Valley are notoriously fine, therefore very dusty, and with many unpaved curbs and no sidewalks in many areas, which could result in crease dust/PM10 impacts in certain locations.

**C. Air quality:**

*“Overall, the air quality in the Puget Sound has continued to improve to meet the standards, though the number of wildfire-impacted days has increased in the last five years.”<sup>10</sup>*

Duwamish Valley lacks a comprehensive air monitoring network that provides sufficient disaggregated air quality data. For an environmental justice community, disaggregated data is critical for understanding “hotspots” or areas that hold high levels of pollution. The DEIS fails to include sufficient disaggregated data for the Duwamish Valley. These hotspot areas are not captured in the current monitoring stations closest to MICs reviewed in the DEIS, thus the claim that air quality has improved overall (including for the Duwamish Valley) is inaccurate.

**D. Freight:**

*“Exhibit 3.10-40 Impacted Study Corridors—GreaterDuwamishMIC,2044 – The Duwamish Valley study areas excludes the majority of South Park and Georgetown neighborhoods, where freight also frequently travel and park in addition to the West Seattle Bridge detours.”<sup>11</sup>*

The Duwamish Valley is disproportionately impacted by diesel pollution because it is a high traffic transportation corridor. Three freeways border the Duwamish Valley: Interstate 5, Highway 99, and the West Seattle Bridge. During the two years that the West Seattle Bridge has been closed for repairs, an average of 100,000 vehicles per day have been rerouted through the Duwamish Valley.<sup>12</sup> Numerous major trucking routes pass through Georgetown and South Park, carrying freight from the Port of Seattle, and nearby industry. Goods movement is one of the largest sources of air pollution in Washington State, 75% of heavy duty trucks pass-through the Duwamish Valley. In this way vehicles miles traveled (VMT) is important to understand how much pollution a truck emits over the course of the year based on how many miles it traveled over the course of the year. To not include comprehensive data of the Duwamish Valley is a job half done.<sup>13</sup>

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<sup>10</sup> Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.2, page 3-29

<sup>11</sup> Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.10, page 3-418

<sup>12</sup> City of Seattle, West Seattle Bridge Program, <https://www.seattle.gov/transportation/projects-and-programs/programs/bridges-stairs-and-other-structures/bridges/west-seattle-bridge-program>.

<sup>13</sup> Exhibit B. Fehr & Peers, City of Seattle – Zero Emission Area Data Collection, at 16 (Sep. 2, 2021).



Furthermore, the DEIS also fails to mention correlating public health data such as the high hospitalization rates for children and adults living in the Duwamish Valley compared to the rest of Seattle.<sup>14</sup>

### III. MEANINGFUL ENGAGEMENT WITH A WHOLEHEARTED EFFORT TO REACH THE DIVERSITY OF THE DUWAMISH VALLEY COMMUNITY FALLS SHORT

**The initial process to submit public comment was not designed for meaningful involvement of the Georgetown and South Park Duwamish Valley community, inhibiting procedural justice and fair opportunity to provide comment. Failing to properly inform the community for a public comment process with timely multilingual tools is an environmental injustice as the community holds significantly less resources compared to the industries also included in the DEIS.** For example, it is unacceptable for a public comment period to be open without the existence of publicly accessible translated materials.

While the City's OPCD expressed aims to build relationships around the topic of the DEIS, diverse representation of the community remained low during the public comment process. This outcome conflicts with the race and social justice initiative commitments of all City staff, operations, policies and practices.

### IV. MITIGATION RECOMMENDATIONS ARE NON-NEGOTIABLE AND MUST BE IMPLEMENTED

It is concerning that mitigation recommendations for the DEIS are not true commitments considered by the Strategy. **This means that impacted residents are asked to volunteer their time to provide feedback on mitigation measures without any reassuring commitment from the City to follow up and solve deep rooted issues regarding environmental hazards and chronic issues of injustice.**

More troublesome, trade offs and mitigation methods to resolve existing community concerns are not fully analyzed, future predictions for 2040 are unclear, and too much of the DEIS relies on a network of citywide initiatives not yet fully realized. Community needs clear environmental justice standards and equitable safeguards for anti-displacement in a rapidly changing city included in the mitigation analysis. It is unfair to resolve all environmental justice concerns by proposing redevelopment in the community while industry remains protected.

Areas that need significant mitigation and reassurance include:

- **Active transportation:** Environmental and transportation solutions noted are centered in small areas and don't take into account the systems of connectivity and intertwining that the area needs.

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<sup>14</sup> <https://southseattleemerald.com/2021/02/28/opinion-clean-air-everywhere-for-everyone-in-washington/>

*“Significant impacts were identified to both active transportation and safety due to the projected increase in people walking and biking in areas with network gaps and the increased potential for vehicle conflicts (particularly trucks) with vulnerable users.... Therefore, it is expected that the Action Alternatives could have significant unavoidable adverse impacts to active transportation and safety.”<sup>15</sup>*

- We support the comments of the Seattle Bike Advisory Board. Both people and natural systems don't exist within isolated areas; they are greatly impacted by the activities that surround them.
  - Each alternative only further perpetuates South Park and Georgetown remaining isolated and at odds with industrial usage all around them, treating them as islands unto themselves.
  - The impacts of the King County International Airport and paused expansion are not fully considered, including the fuel farm and current lead pollution from aviation activities and must be addressed.
- **Air quality:** Increased GHG emissions is a step backwards and fails to account for regional goals around emission reduction and must be addressed to avoid impacts related to climate change.

*“All alternatives—in particular alternatives 3 and 4—contribute to increased GHG emissions through future growth and development in the study area. All Action Alternatives result in GHG emissions above the 10,000 MTCO<sub>2</sub>e mandatory reporting threshold compared to Alternative 1 No Action.”<sup>16</sup>*

- **Air pollution:** Mitigation for air pollution impacts on an increased population must lead to design safeguards and changes regarding the ways industry operates in close proximity to neighbors.

*“Depending on the transportation routes that are used, emissions of air pollutants from mobile sources could concentrate along routes that pass through vulnerable communities, leading to inequitable exposure to air pollution.”<sup>17</sup>*

- **Displacement:** The description of risk of displacement does not reflect community concerns regarding displacement pressures and affordability.

*“Overall, parcels within the study area are at low or moderate risk for displacement.... While some loss of existing housing may be possible under this Alternative this is an expected part of a changing urban environment.”<sup>18</sup>*

- Emphasis on affordable housing for moderate to very low-income residents

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<sup>15</sup> Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.10, page 3-427

<sup>16</sup> Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.2, page 3-78

<sup>17</sup> Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.2, page 3-57

<sup>18</sup> Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.9, page 3-321

- Nevertheless, many of the locations proposed for UI zoning are limited for opportunities such as increased affordable housing while industrial and port operations receive the largest percent of protection under the proposal.
- **Sea Level Rise and disregard for the Superfund impacts:** Impacts of sea level rise and additional threats of climate change must be taken more seriously throughout all mitigation areas.

*“The Duwamish River and Longfellow Creek are each listed as an impaired water body for fecal coliform bacteria, temperature, pH, and dissolved oxygen. Water quality treatment at redevelopment sites will reduce fecal bacteria and other pollutant impacts at sites that redevelop. Significant portions of both Georgetown and South Park neighborhoods are susceptible to sea level rise and all Alternatives, including the No Action Alternative, would increase the concentration of people in these vulnerable areas. Compliance with requirements of the SMP and frequently flooded areas requirements at redevelopment sites, in addition to adaptation measures listed in the mitigation section, may help reduce vulnerability to sea level rise in some portions of the subarea.”<sup>19</sup>*

- **Fairness in zoning:** Increase mixed-use areas in Georgetown and South Park to allow for a larger percentage of community-driven anti-displacement efforts.

*“Alternative 4 would also strengthen protections for core industrial uses in the MML zone on approximately 87% of industrial lands”<sup>20</sup>*

Without binding legislation for mitigation measures and a year-long comprehensive community engagement process, we believe the Maritime and Industrial Strategy will uphold the systemic environmental exposure disparities experienced by the Duwamish Valley community for years to come. **We join the Georgetown Community Council (GCC) in their recommendation to send a companion binding legislation to the City Council that codifies and funds recommended mitigation measures.**

#### V. ACT ON THE VISION AND ISSUES EXPRESSED IN THE COMMUNITY ADVISORY GROUP

In early 2020, Georgetown and South Park community members were invited by the City to discuss their vision and top issues for the Maritime and Industrial Strategy to address. This group strongly expressed the importance of including the elements of maintaining a diverse and vibrant community, environmental equity and pollution mitigation, healthy environment in communities and in industrial areas next to them, affordable housing, workforce development and housing, and job creation.

We believe the suggestions made by the community advisory group were not fully represented throughout all of the alternatives and the significant impacts predicted compromise current neighborhood goals related to the elimination of environmental and health inequities.

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<sup>19</sup>Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.3, page 3-97

<sup>20</sup> Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Summary, page 1-4

In this way, the DEIS must consider an additional alternative that reflects all the priorities of the community for a fair consideration of proposed alternatives. We ask the City to include an additional alternative, alternative 5, that will mirror the realities of today for the future community, not industry, to believe in.

#### VI. RECOMMENDATIONS OVERALL

- A. Commit to a continued community engagement process that reaches far into the diverse and multilingual communities of the Duwamish Valley for the next year and duration of this EIS to legislation.
- B. Expand buffers and UI areas to allow for more affordable housing in addition to increased allotted mixed-use zoning in favor of community over industry.
- C. Draft a companion binding legislation with community for the DEIS that (1) sets a commitment to mitigate all impacts caused under this plan and (2) enforces higher environmental standards for pollution control inclusive of cumulative impacts and related health outcomes.
- D. Increase credibility of data and include disaggregated in the DEIS.
- E. Slow down the DEIS process to allow for the initiatives on which it relies to mitigate impacts make significant headway to avoid undue harm.
- F. Address current issues around pollution, compliance, and enforcement for a healthier environment.
- G. Fold the DEIS process into the comprehensive plan update.

#### CONCLUSION

For decades, the Duwamish Valley has raised serious concerns with regards to industrial pollution, lack of green public space, affordable housing, noise disturbance, public safety and visible air pollution and more. In closing, the Industrial and Maritime Strategy must embody the Racial Equity Outcomes described in the Duwamish Valley Action plan, including equitable access to city resources, accountability and decision-making.<sup>21</sup> The community continues to wait for equitable safeguards from neighboring polluters while business as usual continues. This chronic issue must be addressed and land use change presents a unique opportunity to rezone more spaces for the community in order to restore environmental health and champion placekeeping, economic justice and resilience.

We strongly recommend the City of Seattle commit to frequent and authentic community engagement around land use in order to strengthen environmental standards for industrial neighbors before moving forward on a plan that protects industry over community for generations to come.

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<sup>21</sup> [http://greenspace.seattle.gov/wp-content/uploads/2018/06/DuwamishValleyActionPlan\\_June2018.pdf](http://greenspace.seattle.gov/wp-content/uploads/2018/06/DuwamishValleyActionPlan_June2018.pdf)

To address the long-lasting, cumulative impacts of pollution and systemic disinvestment in communities like the Duwamish Valley, it is essential for the City of Seattle to prioritize the recommendations of the Duwamish Valley community.

Sincerely,

Adrienne Hampton, Climate Policy Manager  
Duwamish River Community Coalition (DRCC)

Greg Ramirez, Chair  
Georgetown Community Council (GCC)

Erica Bush, Lead Organizer  
Duwamish Valley Safe Streets (DVSS)

Velma Veloria, Chair  
King County International Community Coalition (KCIACC)

Maria Ramirez, Chair  
Duwamish Valley Affordable Housing Coalition (DVAHC)





# Public Hearing #1 January 11, 2021

WEBVTT

1

00:00:11.728 --> 00:00:21.120

You want me to Jeff. Okay. So it's interesting.

2

00:00:21.120 --> 00:00:29.519

It is interesting that, uh, in addition to a recording, Webex creates a transcript.

3

00:00:29.519 --> 00:00:33.810

Wow, okay.

4

00:00:37.200 --> 00:00:49.859

That's useful is.

5

00:00:49.859 --> 00:00:55.079

Um, I fixed the text on that 1 slide.

6

00:00:55.079 --> 00:00:59.280

Submitting a draft comment. Oh, thank you.

7

00:01:10.439 --> 00:01:16.260

Lauren Eugene. Good morning. Joshua. Yeah, we'll kick off.

8

00:01:16.344 --> 00:01:18.385

Let me get a critical mass here.

9

00:01:22.435 --> 00:02:57.324

Okay.

10

00:03:16.349 --> 00:03:21.569

Jim, we're just seeing, um, screen with, uh.

11

00:03:21.569 --> 00:03:26.430

Some of your files were not seeing the presentation. Oh, okay. Yeah.

12

00:03:29.969 --> 00:03:38.879

See, if I can rectify that.

13

00:03:40.139 --> 00:03:47.969

Now, we can see that slide. Perfect.

14

00:08:09.473 --> 00:08:13.434

So, it's 10 0, am just a couple more minutes to give people.

15

00:08:14.064 --> 00:08:16.223

She has to log in and then we'll begin.

16

00:10:25.524 --> 00:10:29.724

Okay, well, I think we'll begin and people continue to join us.

17

00:10:29.999 --> 00:10:39.749

Welcome, this is the 1st of 2 public hearings on the industrial maritime strategy draft, environmental impact statement.

18  
00:10:39.749 --> 00:10:44.038  
We released the draft on.

19  
00:10:44.038 --> 00:10:48.418  
December 16th originally had a.

20  
00:10:48.418 --> 00:11:01.558  
45 day comment, period that would have ended on January 31st. We will be extending that comment, period to March. 2nd and today's hearing we will give you.

21  
00:11:01.558 --> 00:11:05.278  
Very brief overview of the proposal.

22  
00:11:05.278 --> 00:11:10.739  
And, uh, the process in our planning process.

23  
00:11:10.739 --> 00:11:14.129  
Uh, we will have time to answer a few questions.

24  
00:11:14.129 --> 00:11:28.558  
About process, not about the substance of the, and then we will take public comment. This is not intended to be a Q and a, on the alternatives or the proposals and Jeff and I are available.

25  
00:11:29.004 --> 00:11:39.264  
To talk with you after the hearing, or any other time, if you want to have some detailed discussions about the proposal. But today is to take comments on the draft.

26  
00:11:40.703 --> 00:11:49.673  
Today's hearing is being recorded in a transcript of the hearing will be included in the final, including a response to comments.

27  
00:11:49.948 --> 00:11:57.359  
So, with that, I'm going to begin with the presentation, and then we will move into the brief Q. and a, and then statements.

28  
00:11:57.359 --> 00:12:02.158  
So, today we're going to talk about the planning process to date.

29  
00:12:02.158 --> 00:12:07.229  
Uh, post concepts and draft alternatives.

30  
00:12:07.229 --> 00:12:10.528  
The topics that we studied in the draft E. I. S.

31  
00:12:10.528 --> 00:12:20.548  
Um, this last bullet is incorrect, says the scope and submitting the scoping comment. We'll talk about how to submit a comment on the draft.

32  
00:12:22.558 --> 00:12:37.524



So, this process has been going on for a few years, and it began with an advisory council process, which was convened in November of 2019, and included a pretty broad cross section of residents, business owners developers. Uh.

33

00:12:40.408 --> 00:12:45.599

People who have a stake in a healthy industrial climate.

34

00:12:45.599 --> 00:12:54.359

We conducted additional engagement with bypass youth, other interested people in groups.

35

00:12:54.359 --> 00:12:59.219

And we've also issued, uh, they encourage you to look at our website a series of.

36

00:12:59.219 --> 00:13:05.609

Profile videos of different industrial activities in Seattle. They're really interesting.

37

00:13:05.609 --> 00:13:18.479

Um, the advisor council developed 11 strategies that comprise industrial maritime strategy and the 1st, implementation action incurred. Uh.

38

00:13:18.479 --> 00:13:31.109

With the scoping process for this, and then in the fall through the budget process, the city council approved new funding for workforce training for industrial companies and green infrastructure funds.

39

00:13:31.109 --> 00:13:37.739

And then this environmental impact statement represents an important milestone in implementing these strategies.

40

00:13:37.739 --> 00:13:41.249

So, we'll give you a view of kind of a.

41

00:13:41.249 --> 00:13:48.418

High level view of the process last summer we had a scoping period where we invited comments to tell us.

42

00:13:48.418 --> 00:13:53.933

What we should study in the, and what did they think of the draft alternatives at that time?

43

00:13:53.933 --> 00:14:06.833

We had a 30 day comment period revised the alternatives and the scope is appropriate and they prepared the draft which we released as I said earlier in December 16th. Um, we'll have a 75 day extended comment, period.

44

00:14:08.548 --> 00:14:21.778

Which is longer than the typical 30 day comment, period for draft. The final will come out in the spring slash summer of 2022. it will include a response.

45

00:14:21.778 --> 00:14:29.339

To the comments, it will evaluate a preferred alternative and it will conduct any other additional analysis.

46

00:14:29.339 --> 00:14:40.168

This identified as necessary through this comment process and finally, once the final is complete, we plan to move forward with comprehensive plan amendments and.

47

00:14:40.168 --> 00:14:44.399

Zoning code legislation to implement the recommendations.

48

00:14:45.688 --> 00:14:50.399

So, in the we study the application of.

49

00:14:51.083 --> 00:15:03.413

New land use concepts that came out of that stakeholder process in different amounts. Throughout the industrial areas. The 1st concept is the maritime manufacturing and logistics zone.

50

00:15:03.984 --> 00:15:14.573

That's really the core industrial zone. It's the strength and established economic clusters to promote protect economic diversity and opportunity.

51

00:15:15.594 --> 00:15:28.104

The industry and innovation zone is an attempt to respond to the future where we have 4 light rail stations in our industrial areas, and it's looking at sort of an industrial.

52

00:15:30.053 --> 00:15:44.514

It doesn't include housing but we are trying to achieve dense employment concentrations around the transit stations. And we'll talk more about how that works, and a few slides forward, and finally the urban industrial zone, which is looking at.

53

00:15:44.543 --> 00:15:53.333

How do we have healthier more vibrant edges between industrial areas and non industrial areas? And we'll get into details now.

54

00:15:54.239 --> 00:16:01.379

This diagram kind of represents how the maritime manufacturer logistics zone would be applied.

55

00:16:01.379 --> 00:16:11.609

It's appropriate for areas that have significant investments in industrial infrastructure. So, what we mean by that is areas near port facilities.

56

00:16:11.609 --> 00:16:15.418

Your rail facilities near, uh.

57

00:16:15.418 --> 00:16:27.208

Freight infrastructure, and by protecting these areas, it would provide long term predictability, facilitate new investments by local industrial businesses.

58

00:16:28.828 --> 00:16:34.739

This is the industry and innovation zone concept and this is the zone that we would apply.

59

00:16:34.739 --> 00:16:39.894

Surrounded by rail stations and existing industrial commercial areas,

60

00:16:40.464 --> 00:16:40.943

um,

61

00:16:40.943 --> 00:16:41.124

which,

62

00:16:41.124 --> 00:16:41.484

you see,

63

00:16:41.484 --> 00:16:49.134

in this diagram is the gray portions of these buildings is industrial and currently,

64

00:16:49.134 --> 00:16:51.864

only industrial uses are permitted in those places.

65

00:16:52.193 --> 00:16:59.394

But by providing industrial, a certain amount of commercial uses would be allowed above that commercial offices.

66

00:16:59.394 --> 00:17:09.894

For example, once again, there was potential uses, and depending on the alternative, and we'll get into that these will be located anywhere from a quarter to half mile from transit stations.

67

00:17:10.138 --> 00:17:21.898

In the urban industrial zone, this is those areas, those transition areas between core industrial areas and non industrial areas. It's intended to achieve a diversity of.

68

00:17:21.898 --> 00:17:25.138

Small affordable spaces, um.

69

00:17:25.138 --> 00:17:36.598

Uh, streetscape that provides protection to separate pedestrians, freight movement and it allows for in some of the alternatives.

70

00:17:36.598 --> 00:17:43.499

An expansion of the existing caretaker quarter slash artist studio housing provisions.

71

00:17:44.939 --> 00:17:54.028

So, when I talk about environmental impact statement, alternatives, these are different.

72

00:17:54.028 --> 00:18:06.538

Projections of the future that we use to compare, we compare them with each other to identify the different impacts between alternatives. This allows decision makers to understand.

73

00:18:06.743 --> 00:18:20.243

How the decisions they make could affect the local area that built a natural environment, and they are compared to a no action alternative, which is what exists today as a baseline.

74

00:18:21.173 --> 00:18:21.894

Um.

75

00:18:22.169 --> 00:18:29.638

The subject studied in the for determined as part of the scoping process that was held earlier this summer.

76

00:18:31.469 --> 00:18:39.298

So, the 1st alternative, the no action alternative this is what exists today. 90% of it is industrial general.

77

00:18:39.298 --> 00:18:46.949

5% is industrial commercial. That's the darker blue and the very lightest blues industrial buffer. That's 5.

78

00:18:46.949 --> 00:19:00.269

Relies on existing zoning amanda's policies. No new residential uses are permitted other than existing provisions for caretakers and artist studios and lodging is prohibited in the stadium district.

79

00:19:02.068 --> 00:19:15.118

The 1st, action alternative action alternative means where we're studying something different than what exists today is limited future of industry. So we apply the new zones in this alternative.

80

00:19:15.118 --> 00:19:21.028

89% of the area isn't that maritime manufacturing and logistics zone?

81

00:19:21.028 --> 00:19:32.788

So, it's like 1% less than existing industrial general. The industry and innovation zone comprises about 5% of the land in this area. And.

82

00:19:32.788 --> 00:19:40.798

That that would be the existing industrial commercial zones, and the areas within about a quarter mile of transportation.

83

00:19:40.798 --> 00:19:46.318

And then the urban industrial zone is applied in about 6% of the area.

84

00:19:46.318 --> 00:19:50.699

So, the golden rod colors, that urban industrial, you see that in the stadium district.

85

00:19:50.699 --> 00:20:02.338

In Davis, in portions of Ballard, you see industry and innovation Mary, North section of Ballard or a small strip right there. Also the SODO station.

86

00:20:04.469 --> 00:20:11.128

Alternative 3 is the targeted future of industry alternative, so maritime manufacturing and logistics.

87

00:20:11.128 --> 00:20:14.548

Comprises 86 of the industrial land area.

88

00:20:14.548 --> 00:20:20.788

The industry and innovation zone increases a 7% and it's constant. It's once again, that is the.

89

00:20:20.788 --> 00:20:35.038

Existing industrial commercial zones in those areas within a half mile of a light rail station, with the exception of ballot and this alternative and we'll talk about that in the next alternative. And then the urban industrial zone is 7%.

90

00:20:35.874 --> 00:20:50.364

So you see, most of the area north of every way, in this alternative is urban industrial area on the North Shore of Lake Union is urban industrial and industry and innovation. You see, urban industrial around the stadium district.

91

00:20:50.423 --> 00:20:59.844

And if you look by the SoDo station, you see an expanded footprint of the industry and innovation zone. It stretches down lander to the Starbucks center.

92

00:21:02.068 --> 00:21:11.878

Alternative 4 is the alternative with the greatest amount of change. So, 86% of the land is maritime manufacturing in logistics.

93

00:21:11.878 --> 00:21:19.769

8% of the land area is in the industry and innovation zone and 6% is the urban industrial zone.

94

00:21:19.769 --> 00:21:26.788

Both this alternative and the 1 before we moves focused areas of land in Georgetown, South Park from the mic.

95

00:21:26.788 --> 00:21:39.659

And it does permit lodging in the stadium area overlay district and so I can show you the Landy is parent. You seen Ballard, you have more industry and innovation kind of on both sides of 14th Avenue.

96

00:21:39.659 --> 00:21:45.749

Um, you see expanded this industry and innovation for the solar station, running down 6th Avenue.

97

00:21:45.749 --> 00:21:54.898

You see a slightly more urban industrial in the stadium district in the area, just south of it. And in the Davis area, you also have a really industrial.

98

00:21:56.368 --> 00:22:00.898

So this is kind of a summary slide. Some of the differences.

99

00:22:00.898 --> 00:22:05.969

Once again, alternative 1 is a no action alternative. No change.

100

00:22:05.969 --> 00:22:13.769

In our, when we talk about impacts, we're evaluating the impacts of growth, uh.

101

00:22:13.769 --> 00:22:22.199

To the year 2044 that is also the horizon year for the upcoming major update of the comprehensive plan.

102

00:22:22.344 --> 00:22:33.683

With no action alternative, we're projecting approximately 23,000 new jobs in the industrial areas increase of 73 dwelling units under the existing provisions of the caretakers artist studio quarters.

103

00:22:33.683 --> 00:22:40.644

No changes to the mic or the boundaries and no changes to comprehensive plan land, use policies.

104

00:22:41.969 --> 00:22:52.588

Alternative 2 includes the new industrial zones makes minimal changes to the core industrial zone, and adds the industry innovation zone within the quarter mile transit stations.

105

00:22:52.588 --> 00:23:00.058

We're projecting that would result in about 34,000 jobs in the year. 2044 it increase of 80.

106

00:23:00.058 --> 00:23:09.538

Caretakers are to studio dwelling units no changes to the maker, the pin mic boundaries and it would update the comprehensive plan.

107

00:23:09.538 --> 00:23:20.729

Policies Congress, land, use policy, industrial language policies to include the new zones and to include protections for industrial land, going forward.

108

00:23:20.729 --> 00:23:26.759

Alternative 3, future of industry targeted, moderate change.

109

00:23:26.759 --> 00:23:33.058

It includes the new industrial zones has the greatest amount of the urban industrial zone. Um.

110

00:23:33.058 --> 00:23:39.749

An industry innovation zoning is applied within 1, half miles of the transportation.

111

00:23:39.749 --> 00:23:44.009

In 2044, we project that will be about 57,000 new jobs.

112

00:23:44.009 --> 00:23:49.588

With slightly revised provisions for caretakers and studio quarters.

113

00:23:49.588 --> 00:23:55.528

Artist studio dwelling in this we expect about 610 new dwelling edits.

114

00:23:55.528 --> 00:24:04.979

It would remove the screen areas and Georgetown and South Park from the maker that been make boundaries and would include the new comprehensive plan policies.

115

00:24:04.979 --> 00:24:09.659

An alternative for, which has the greatest change um.

116

00:24:09.659 --> 00:24:14.489

It applies to industry innovations that are more than half mile from transit stations.

117

00:24:14.489 --> 00:24:19.588

We're projecting in 2044 that would result in about 59,000, new jobs.

118

00:24:19.588 --> 00:24:34.439

An increase in dwelling units with new caretakers and artist studio provisions. It's about 2012 units, removes the same parcels of land as alternative 3 from the making the pin MC and would also include the updated.

119

00:24:34.439 --> 00:24:38.969

Industrial land policies and the comprehensive plan.

120

00:24:38.969 --> 00:24:43.199

So, what did we study and what topics should we studied in the draft?

Yes.

121

00:24:43.199 --> 00:24:47.638

We studied impacts on related to soils and geology.

122

00:24:47.638 --> 00:24:51.239

Air quality greenhouse, gas emissions.

123

00:24:51.239 --> 00:24:56.278

Water resources, plants and animals contamination noise.

124

00:24:56.278 --> 00:24:59.489

Lighten glare Landon shoreline use.  
125  
00:24:59.489 --> 00:25:05.068  
Housing transportation, historic archaeological and cultural resources.  
126  
00:25:05.068 --> 00:25:09.959  
Open space and recreation public services and utilities.  
127  
00:25:11.878 --> 00:25:18.148  
So, the contents of the draft include a summary chapter that summarizes.  
128  
00:25:18.148 --> 00:25:21.659  
All of the impacts found and potential mitigation of strategies.  
129  
00:25:21.659 --> 00:25:27.959  
Chapter 2 is a detailed discussion of the alternatives, including.  
130  
00:25:27.959 --> 00:25:34.378  
Uh, development, regulations, comprehensive plan, land, use policies and  
the maps themselves.  
131  
00:25:34.378 --> 00:25:42.568  
Chapter 3 is, is the detailed analysis of environment, environmental  
impacts and mitigation strategies.  
132  
00:25:42.568 --> 00:25:52.378  
It identifies thresholds and significant impact that is how do we define  
what a significant impact is and it includes an equity analysis for each  
element.  
133  
00:25:52.378 --> 00:26:00.388  
Finally chapter 4 and 5 include acronyms and references and appendices.  
134  
00:26:01.558 --> 00:26:08.278  
So, to recap the process scoping occurred last summer, started on July  
8th and the August 9.  
135  
00:26:08.278 --> 00:26:18.058  
The draft was issued December 16th we'll have the 75 day extended comment  
already ending on March. 2nd. We will be publishing a notice of that next  
week.  
136  
00:26:18.058 --> 00:26:22.679  
Finally will be released in the spring of summer of 2002.  
137  
00:26:22.679 --> 00:26:30.929  
In following with each of the final, we will be preparing legislation to  
amend the comprehensive plan in the zoning code to implement the final  
recommendation.  
138  
00:26:33.719 --> 00:26:36.778  
So, what is an effective draft comment.  
139  
00:26:36.778 --> 00:26:40.979



We really want to know where additional analysis is needed.  
140  
00:26:41.999 --> 00:26:47.249  
We want to know if information is incorrect or incomplete, it needs to be addressed.  
141  
00:26:47.249 --> 00:26:56.669  
If you have ideas, but how the alternatives can be modified or improved, let us know if there are potential mitigation strategies that we haven't identified.  
142  
00:26:56.669 --> 00:26:59.699  
Uh, we would also be interested in hearing that.  
143  
00:26:59.699 --> 00:27:03.328  
All comments submitted either the public hearing.  
144  
00:27:03.328 --> 00:27:11.608  
Or the rich and comments received by March, 2nd will be included in the final and it will be a response to the comments.  
145  
00:27:13.078 --> 00:27:19.919  
Finally, if you go to our Web site, there's a raft of materials, including the draft of.  
146  
00:27:19.919 --> 00:27:29.729  
Supporting materials, including an executive summary and a story map to kind of help you guide you through the I. S, in a link to submit.  
147  
00:27:29.729 --> 00:27:35.729  
A comment the draft and that concludes the presentation.  
148  
00:27:35.729 --> 00:27:38.969  
So, what we want to do next.  
149  
00:27:38.969 --> 00:27:47.999  
Is if there were questions about process, only please raise your hand. We will take a few minutes to do that and then we will move into comments.  
150  
00:27:58.078 --> 00:28:03.269  
Great I see no questions in the process once again, Jeff, and I are available.  
151  
00:28:03.269 --> 00:28:17.818  
Offline if you want to have more detailed discussions, so we will now take comments on draft. We will try to go without a time limit. I would encourage you to limit your comments to 1 to 2 minutes.  
152  
00:28:17.818 --> 00:28:21.749  
And, um, if you would like to comment, uh.  
153  
00:28:21.749 --> 00:28:35.009  
Please raise your hand, Curtis.  
154

**Verbal  
Comment  
H1**

00:28:37.769 --> 00:28:45.838

Be on YouTube you're unmuted. Thank you very much. I'm actually hoping that John marchionne and I could.

155

00:28:45.838 --> 00:28:51.568

Tackle our comments together, so I'll start and if it worked out for you, all John could follow me.

156

00:28:52.493 --> 00:29:02.153

So, I'm Josh Curtis and the executive director of the Washington state ballpark public facilities district. We're the owners of T mobile park. I am with John. marchionne.

157

00:29:02.153 --> 00:29:13.463

Of course, the executive director of the Washington state public stadium authority owners of Lumin field and event center. We are both responsible for overseeing the public investment in the ballpark stadium and events center.

158

00:29:13.733 --> 00:29:19.644

We work to ensure that these facilities remaining 1st, class condition and among the best in professional sports.

159

00:29:20.423 --> 00:29:35.243

Really appreciate the opportunity to provide or comments today on the city's dropped. Yes, we were going to both request an extension that already being granted, we appreciate that. Thank you going to talk about a couple of concerns we have. We will be submitting written comments.

160

00:29:35.243 --> 00:29:38.243

Of course. 1st, as as.

161

00:29:38.729 --> 00:29:51.473

City staff knows the, and the have been long participants in planning for the area around the ballpark as early as 2000. the helped to create the stadium district in 2006. in 2007.

162

00:29:51.473 --> 00:29:55.973

we both participated in a livable South downtown planning process and environmental review. Few years later.

163

00:29:55.973 --> 00:30:07.044

We partnered to create the stadium district concept plan in 2012 and, of course, we both participated in all of the state and district industrial, maritime working groups, formed over the most recent 3, male administrations.

164

00:30:07.044 --> 00:30:20.423

1 thing that has been made clear from all of this work. Is that the same district is unique? This small self contained area around the stadiums and exhibition center attracts more than 1Million visitors. Each year.

165

00:30:20.844 --> 00:30:26.094

**H1-1**

**H1-2**

It's adjacent to downtown to historic neighborhoods and the southern terminus of the waterfront.

166

00:30:31.528 --> 00:30:34.888

While portions of the district do straddle to do on the mic.

167

00:30:34.888 --> 00:30:46.463

There's almost no industry left in the stadium district. This area is largely zoned industrial commercial. I see. And given the accompanying high prices of land has mostly been developed for office uses.

168

00:30:46.824 --> 00:30:59.364

We are concerned that the uniqueness of the same district has not has been lost and obscured by the city's broad base industrial land proposals. 2 examples I'll start. And then John will follow 1st example.

169

00:30:59.878 --> 00:31:08.969

The, the transportation impact of a full office, build out around the stadiums, which is allowed under the current zoning.

170

00:31:08.969 --> 00:31:15.628

As a result, we think the transportation impact, the proposed land use changes cannot be meaningfully analyzed.

171

00:31:15.628 --> 00:31:22.169

John, do you want to take it from here? John? Let me unmute. You.

172

00:31:22.169 --> 00:31:26.009

You are muted hear me now.

173

00:31:26.009 --> 00:31:41.003

Yes, great. Um, the stadium district already have significant housing around them. We have a 240 foot tall tower on the North fly. We have the gridiron condos literally a Stone's throw away. I should say a football's throw away yet.

174

00:31:41.003 --> 00:31:49.463

The city's proposal focuses on the incompatibilities of housing, primarily with land that zone industrial general.

175

00:31:49.493 --> 00:31:56.183

It doesn't make clear how additional housing around the stadiums out of character with what already exists here.

176

00:31:57.778 --> 00:32:02.338

So, for these reasons, we ask that the final separate.

177

00:32:02.338 --> 00:32:10.679

Out it's analysis of the stadium district, and in particular its analysis of impacts to land news, transportation and housing.

178

00:32:10.679 --> 00:32:19.229

2nd, we are very concerned that the antiquated restrictions on housing that were developed for land, zoned industrial.

H1-2  
cont.

Verbal  
Comment  
H2

H2-1

H2-2

179  
00:32:19.229 --> 00:32:29.999  
General decades ago, maybe half a century ago are being proposed for what will be new construction on land zone industrial commercial.

180  
00:32:29.999 --> 00:32:39.509  
Strongly believe that this is a fatal flaws cities proposal, and will not generate the growth and economic benefits desired.

181  
00:32:39.509 --> 00:32:43.709  
We will provide additional details and analysis in our written comments.

182  
00:32:43.709 --> 00:32:49.499  
I'd like to close by thanking the city for extending the comment period for the draft.

183  
00:32:49.499 --> 00:32:54.598  
This is a complicated document that warrants close review. Thank you for your consideration.

184  
00:32:55.679 --> 00:32:59.909  
Thank you John, is anybody else wish to comment.

185  
00:33:25.108 --> 00:33:32.338  
I would just note and I think many of, you know, this, but, uh, written comments, email comments.

186  
00:33:32.338 --> 00:33:35.548  
Are just the same as a verbal.

187  
00:33:35.548 --> 00:33:41.578  
Comment at this hearing, so we look forward to receiving your written comments.

188  
00:33:47.098 --> 00:33:50.489  
If there are no additional comments.

189  
00:33:50.489 --> 00:33:54.509  
Today we will conclude the hearing.

190  
00:33:54.509 --> 00:33:58.919  
Once again you have until March 2nd, to see my written comments.

191  
00:33:58.919 --> 00:34:03.209  
And if Jeff or I can be helpful, uh.

192  
00:34:03.209 --> 00:34:06.598  
Do any part of it please reach out and let us know Thank you.

193  
00:34:44.668 --> 00:34:47.009  
All right, I will hit in the meeting.

## Public Hearing #2 January 12, 2021

WEBVTT

1

00:01:52.105 --> 00:02:17.094

Okay.

2

00:02:32.250 --> 00:02:36.539

Jimmy ready to kick us off I guess that we've kind of did it. All right.

3

00:02:36.539 --> 00:02:42.449

Welcome everyone this is the 2nd of 2 public hearings for the.

4

00:02:42.449 --> 00:02:51.509

Industrial maritime draft, environmental impact statement um, my name's Jim Holmes. My colleague Jeff Lynn is also here tonight.

5

00:02:51.509 --> 00:02:56.129

We will be reading this hearing. This is a public hearing.

6

00:02:56.129 --> 00:02:59.939

Not a question and answer session.

7

00:02:59.939 --> 00:03:08.724

What we will do is a brief high level presentation about the draft process,

8

00:03:08.754 --> 00:03:10.914

the industrial maritime strategy process,

9

00:03:12.235 --> 00:03:15.294

next steps and then we will,

10

00:03:15.324 --> 00:03:15.985

um.

11

00:03:16.289 --> 00:03:24.180

Have time we can take a few questions about process, not about the substance of the draft and then we will move into public comment.

12

00:03:24.180 --> 00:03:27.270

So, I will start with a presentation now.

13

00:03:27.270 --> 00:03:32.909

The in this meeting is being recorded and all all comments that we received tonight.

14

00:03:32.909 --> 00:03:37.740

Will be part of the final, and we will have to prepare a response to those comments.

15

00:03:39.000 --> 00:03:42.629

So, tonight we're going to talk about the planning process today.

16

00:03:42.629 --> 00:03:47.939

Proposed land use concepts that were studying in the drafting alternatives.

17

00:03:47.939 --> 00:03:55.530

The topics that the elements of the environment that were studied in the draft.

18

00:03:55.530 --> 00:03:59.340

Can finally have a submit a draft comment.

19

00:03:59.340 --> 00:04:11.879

So this process started with it advisory council process in November of 2019 it concluded in May of 2021 and this was a.

20

00:04:12.444 --> 00:04:23.095

The advisory council represented a broad cross section of stakeholders somehow connected to the industrial areas that included business owners,

21

00:04:23.814 --> 00:04:25.375

labor representatives,

22

00:04:25.944 --> 00:04:29.754

residents of nearby neighborhoods and others.

23

00:04:30.478 --> 00:04:43.798

As well, as for neighborhood, sub area groups, 1 for Ballad 1 for inner bay 1 for SODO and 1 for Georgia, South Park, there was additional engagement with outreach to bypass youth.

24

00:04:43.798 --> 00:04:58.588

Other interested organizations and groups, and we've recently completed this series of business profile videos on our Web site that we encourage you to have a look at to see some of the industrial activities going on in our industrial areas. Um.

25

00:04:58.824 --> 00:05:02.903

Well, this is an important implementation step of the industrial maritime strategy.

26

00:05:03.204 --> 00:05:10.853

There was some budget process steps taken last fall by city council with increased funding for workforce training,

27

00:05:10.853 --> 00:05:14.004

for industrial companies and green infrastructure,

28

00:05:14.963 --> 00:05:19.793

specifically targeting freight movement in our industrial areas.

29

00:05:20.903 --> 00:05:27.113

And then this environmental impact statement, which evaluates land use changes that were identified through that process.

30

00:05:32.098 --> 00:05:35.728

2nd, it's not advancing.

31

00:05:35.728 --> 00:05:43.709

So, this is a graphic that summarizes the process for the draft for the environmental impact statement.

32

00:05:43.733 --> 00:05:48.774

Last summer we held a scoping period it was 30 days started on July 8th,

33

00:05:48.774 --> 00:05:49.733

and then on August 9th,

34

00:05:49.764 --> 00:05:53.814

where we presented draft alternatives for study,

35

00:05:53.814 --> 00:06:00.834

in areas of the environment that we would study and asked for the public's help and identifying what was missing,

36

00:06:00.834 --> 00:06:04.673

what did need to be studied and were there any refinements of the alternatives?

37

00:06:05.879 --> 00:06:17.249

We revise the alternatives and the scope accordingly and began working on the draft over the course of the late summer in the fall in the draft was issued on.

38

00:06:17.249 --> 00:06:29.879

December 16th, initially with a 45 day comment, period, concluding on July 31st, we are extending that comment, period to March 2nd, which would make for a 75 day comment. Period.

39

00:06:29.879 --> 00:06:36.928

Following the common period, we will prepare a final with a preferred alternative.

40

00:06:36.928 --> 00:06:50.218

And a response to comments, and we expect that to be available in the springs, or summer of 2022 following the final, we will prepare legislation to implement the recommendations.

41

00:06:50.218 --> 00:06:54.988

The ladies concepts we are studying.

42

00:06:54.988 --> 00:07:00.869

Are these 31 would be the maritime manufacturing and logistics zone.

43

00:07:00.869 --> 00:07:06.899

This would be the core industrial zone. It's intended to strengthen the economic clusters.

44

00:07:06.899 --> 00:07:10.019

To protect economic diversity and opportunity.

45

00:07:10.019 --> 00:07:13.048

The industry innovation zone.

46

00:07:13.048 --> 00:07:27.744

Uh, to support modern industrial innovation and capitalize on major transit investments, we think of this as kind of an industrial TSG approach as our industrial areas will have for future sound Transportations in them.

47

00:07:28.163 --> 00:07:42.803

And then the urban industrial zone, which is intended to foster vibrant districts to support local manufacturing and entrepreneurship. So these areas would be designed to create healthier transitions between industrial areas and non industrial areas.

48

00:07:43.254 --> 00:07:57.444

They would recognize that types of uses there would include maker spaces, Breweries, other types of industrial activities that could generate foot traffic. And so we would look to have a streetscape program that.

49

00:07:57.749 --> 00:08:00.899

Provides for safe movement of pedestrians and freight.

50

00:08:01.584 --> 00:08:13.463

So, I've got some diagrams here to kind of illustrate these concepts, the maritime manufacturing and logistics zone. Really leverages historic investments in industrial infrastructure.

51

00:08:13.884 --> 00:08:22.973

That's core facilities, rail, freight corridors and by strengthening by maintaining and strengthening these areas.

52

00:08:23.184 --> 00:08:34.884

It provides long term predictability to existing industries who can invest on site who require proximity to these resources and it provides.

53

00:08:35.818 --> 00:08:40.979

Buffers about the industrial zones will provide buffers between this zone and non industrial areas.

54

00:08:41.999 --> 00:08:51.688

The industry in innovation zone, that's the, that this is the zone that would replace for the most part existing industrial commercial zoning.

55

00:08:51.688 --> 00:08:56.938

And it would also be applied in areas around the future light rail stations.

56

00:08:56.938 --> 00:09:03.208

So, in this diagram, which you were, it's an incentive system and what you're seeing is the gray areas.

57

00:09:03.208 --> 00:09:06.629



Our industrial space and and.

58

00:09:06.629 --> 00:09:16.739

By providing that industrial space, you would then be able to develop commercial space above that. The intent here is to really create employment density around the transit stations.

59

00:09:18.418 --> 00:09:29.428

And this is the urban industrial concept, you'd see finer grained development. It's adjacent to non industrial areas. We are.

60

00:09:29.428 --> 00:09:43.828

In some of the alternatives, so we'll get an expansion of existing caretakers in our studio provisions. So that's what you see in that building with the gray floors. Those would be industrial and that would be the caretakers quarter units above.

61

00:09:45.958 --> 00:09:57.058

So, with an environmental impact statement, it's, it really is about looking at how the different alternatives affect the built in natural environment.

62

00:09:57.058 --> 00:10:01.589

Um, and it by having a good range of alternatives.

63

00:10:01.589 --> 00:10:07.649

We can understand how the impacts differ and identify the different trade offs of policy choices.

64

00:10:07.649 --> 00:10:20.818

Because an impact is identified, it does not mean that policy can't be chosen, but we need to disclose that to decision makers. So they understand they have that information when they make their decisions.

65

00:10:20.818 --> 00:10:31.828

All of the action alternatives those are by action alternative. I'm referring to alternatives that proposed changes are compared to the no action alternative, which is.

66

00:10:31.828 --> 00:10:39.839

Conditions as they exist today, that is the baseline to understand what new actions are resulting in impacts.

67

00:10:39.839 --> 00:10:47.458

Um, and as I said earlier, the subject that we studied in, the were determined as part of the scoping process last summer.

68

00:10:48.958 --> 00:10:52.708

So this is the no action alternative alternative 1.

69

00:10:52.708 --> 00:10:58.288

Um, this is existing industrial zoning in the city. Uh.

70

00:10:58.288 --> 00:11:03.538

The medium blue, if you will is the industrial general is zone and the overwhelming majority.

71

00:11:03.538 --> 00:11:11.938

Of industrial land is in this, his own category 90. the darker blue is industrial commercial and that's a smaller.

72

00:11:11.938 --> 00:11:24.359

Portion of the industrial areas and that's about 5% and then industrial buffer, which is hard to see on this map because it's some light blue is also 5%.

73

00:11:24.359 --> 00:11:29.158

These rely on the existing zoning and land use policies.

74

00:11:29.158 --> 00:11:41.099

This alternative does not allow new residential uses other than existing provisions for caretakers in our studios and lodging is continues to be prohibited in the stadium district overlay.

75

00:11:43.254 --> 00:11:56.634

The 1st, action alternative is alternative to limited future of industry and the maritime manufacturing logistics zone is about 89% of land area. Once again, overwhelming majority of industrial land is in this zone.

76

00:11:56.634 --> 00:11:59.333

The industry and innovation zone is.

77

00:12:02.274 --> 00:12:15.774

This is 5%, but it's between 5 and 6, we rounded, and that replaces existing IC, industrial commercial zones and we are starting to apply it around transit stations in this alternative within a quarter mile.

78

00:12:15.774 --> 00:12:18.803

And that really shows up right here at the SoDo station.

79

00:12:19.739 --> 00:12:32.009

And then their urban industrial zone comprises about 6% of the industrial land and you can see that here in North Ballard a little bit here in central North Ballard and on the East edge of it.

80

00:12:32.009 --> 00:12:39.058

Also in Davis area around the stadium districts, and then buffering Georgetown in South Park.

81

00:12:42.203 --> 00:12:52.644

Alternative 3 is a targeted feature of industry approach, so there's a little less of the maritime manufacturing and logistics zone. There's more of the industry and innovation zone.

82

00:12:52.854 --> 00:13:03.234

In this case, we've increased it to approximately 1 half mile radius from the light rail stations and there's more urban industrial zone. You see all of that area invalid north of leery way.

83

00:13:03.234 --> 00:13:10.104

For example, it removes some focus notes of land in Georgetown in South Park. From the.

84

00:13:11.339 --> 00:13:15.749

And it would permit lodging in the stadium transition overlay district.

85

00:13:17.578 --> 00:13:23.578

And at the upper end of change, alternative for is the expanded future of industry alternative.

86

00:13:23.813 --> 00:13:35.484

So maritime manufacturing and logistics zone is 86% of the land area industry in innovation has increased to 8%, and it's applied in amounts greater than 1, half mile from the stations. Once again.

87

00:13:35.484 --> 00:13:41.573

If we look at SoDo, you see, it extends down the 6th Avenue quarter. It goes down my industry to Starbucks center.

88

00:13:43.259 --> 00:13:49.048

You also see a spine of it in a Ballard along 14th Avenue. Um.

89

00:13:49.048 --> 00:14:01.229

And the urban industrial zone is a little less an alternative 3, but it includes expanded industry, supportive housing with the potential for up to 2000 units.

90

00:14:01.229 --> 00:14:04.499

It removes focus land in Georgetown.

91

00:14:04.499 --> 00:14:11.038

In South Park from the, and it also permits lodging in the stadium transition overlay district.

92

00:14:11.038 --> 00:14:15.869

So, I have a summary chart here and.

93

00:14:15.869 --> 00:14:23.548

Start my screen is making it hard to see. So that in the no action alternative.

94

00:14:24.624 --> 00:14:36.264

In all of the alternatives studies impacts of growth through the year 2044 that is also the horizon year for the major update to the comprehensive plan, which will occur in 2024.

95

00:14:39.058 --> 00:14:42.298

With the no action alternative if nothing changes.

96

00:14:42.298 --> 00:14:47.609

We are projecting there would be approximately 23,000, new jobs in the industrial areas.

97  
00:14:47.609 --> 00:14:52.828  
73 new dwelling units there would be no changes to the boundaries of the.  
98  
00:14:52.828 --> 00:14:58.288  
Do you want mishmash, or they've been Mick and there's no new  
comprehensive plan changes.  
99  
00:14:58.288 --> 00:15:02.818  
Alternative to includes the new industrial zones.  
100  
00:15:03.024 --> 00:15:15.293  
Makes minimal changes to the core industrial zone as industry innovation  
with an, a quarter mile, the stations, and we're projecting that this  
alternative would result in 34,000 jobs by the year. 204,480, new  
dwelling units.  
101  
00:15:18.563 --> 00:15:19.823  
This alternative does not,  
102  
00:15:19.884 --> 00:15:20.423  
as I said,  
103  
00:15:20.423 --> 00:15:21.264  
have any changes,  
104  
00:15:21.264 --> 00:15:23.453  
the boundaries of the drama shoemaker's have been made,  
105  
00:15:23.783 --> 00:15:30.894  
but it would include updated industrial land policies that would allow us  
to implement these zones and also place,  
106  
00:15:30.894 --> 00:15:35.333  
stronger protections for industrial land located with manufacturing  
industrial centers.  
107  
00:15:35.543 --> 00:15:36.653  
In the comprehensive plan.  
108  
00:15:38.369 --> 00:15:52.408  
Alternative 3 is the moderate alternative. It includes the new industrial  
zones as the greatest amount of the urban industrial zone. And, as I said  
earlier, the industry and innovation zones within 1, half mile, the  
transit station.  
109  
00:15:52.408 --> 00:15:57.839  
In the year 2044 we're projecting, there'd be an additional 57,000 jobs.  
110  
00:15:57.839 --> 00:16:01.048  
610 dollar units.  
111  
00:16:01.048 --> 00:16:05.698

This alternative also, as I said earlier moves, Dianne from Georgia do  
em.

112

00:16:05.698 --> 00:16:14.698

Georgetown and South Park from the manufacturing industrial center, this  
alternative also has new comprehensive plan policies.

113

00:16:14.698 --> 00:16:18.719

An alternative for to summarize with the greatest change.

114

00:16:18.719 --> 00:16:25.438

It includes the new zones, applies the industry and innovation zone and  
within 1, half mile from transit stations.

115

00:16:25.438 --> 00:16:40.224

We project there would be 59,000 new jobs in the year 2044 with this  
alternative a little over 2000, new dwelling units. This removes the same  
nose of land from Georgia and South Park from the manufacturing  
industrial center and also includes new comprehensive plan policies.

116

00:16:43.708 --> 00:16:48.538

What elements did we study in the drafting? Yes.

117

00:16:48.538 --> 00:16:53.788

We studied soils and geology, air, quality, greenhouse, gas emissions.

118

00:16:53.788 --> 00:16:57.719

Water resources, plants and animals contamination.

119

00:16:57.719 --> 00:17:06.058

Noise light and layer land in shoreline use housing, transportation,  
historic, architectural and cultural resources.

120

00:17:06.058 --> 00:17:11.038

Open space and recreation public services and utilities.

121

00:17:11.038 --> 00:17:18.538

For those who have not yet read the draft, um.

122

00:17:18.538 --> 00:17:30.419

And kind of go through how it's organized chapter 1 is a summary of the  
findings. So you can actually, it's kind of a cliff's notes version of  
the detailed analysis found later in the document.

123

00:17:30.594 --> 00:17:43.104

Chapter 2 does a detailed discussion of the proposal and the  
alternatives, and you can in chapter here, you will find things like,  
proposed comprehensive plan policies, proposed development, regulations.

124

00:17:43.854 --> 00:17:48.054

Detailed maps should answer questions about the alternatives that were  
studied.

125

00:17:48.358 --> 00:17:56.189

Chapter 3 is where you have the detailed analysis of environmental impacts and identification of medication strategy.

126

00:17:56.189 --> 00:18:01.798

Measures it explains and defines what the thresholds that define.

127

00:18:01.798 --> 00:18:07.558

When a significant impact occurs, and there's an equity analysis for each of the elements studied.

128

00:18:07.558 --> 00:18:13.138

In chapter 4 and 5 wrap up the document with acronyms and references and appendices.

129

00:18:14.219 --> 00:18:19.528

So, to recap the process, we did the scoping process last summer.

130

00:18:19.528 --> 00:18:24.598

We released a draft a, in December, and we are currently in the comment, period.

131

00:18:25.074 --> 00:18:38.183

Once that is complete, we will prepare response to comments, preferred alternative and conducting the analysis that might be necessary and release a final in the spring or summer of 2022.

132

00:18:39.778 --> 00:18:44.308

Following that we will propose legislation to implement these recommendations.

133

00:18:46.318 --> 00:18:51.028

A few words about an effective comment, drafting a s comment.

134

00:18:51.028 --> 00:18:56.969

It would it really help us if you can identify where there's additional analysis that we need to do?

135

00:18:56.969 --> 00:19:06.419

If there's some incomplete information, it needs correction or inaccurate information that needs correction. That would be helpful for us to know.

136

00:19:06.419 --> 00:19:11.489

If you have thoughts about how the alternatives can be modified or improved.

137

00:19:11.489 --> 00:19:18.598

That would be useful and finally, if there are potential mitigation strategies that we haven't identified, please let us know.

138

00:19:18.598 --> 00:19:23.969

I'm worried about the preferred alternative I mentioned this on alternatives is.

139

00:19:23.969 --> 00:19:30.838

It in all likelihood would be some composite of the 4 alternatives. We've just seen. So don't feel like.

140

00:19:30.838 --> 00:19:36.959

If you're making a comment about how to modify the alternatives that you can't mix and match.

141

00:19:36.959 --> 00:19:44.429

Probably always happens and that concludes the, uh.

142

00:19:44.429 --> 00:19:47.459

Presentation, so.

143

00:19:47.459 --> 00:19:53.909

If there were any questions about process the about the process, uh.

144

00:19:53.909 --> 00:20:03.179

The commenting process, please, this is a good time to raise your hand, and we'll go down and I see. 1 hand raised. So, let me.

145

00:20:06.598 --> 00:20:12.989

Trying to unmute you hold on a 2nd.

146

00:20:16.648 --> 00:20:21.959

All right D you are unmuted? Hi. Can you see me? Okay.

147

00:20:21.959 --> 00:20:25.318

I can't see you. I see your D.

148

00:20:25.318 --> 00:20:29.308

Okay, um, sorry about that I'm having I hear you.

149

00:20:29.308 --> 00:20:33.298

You can hear me. Can you see me now? Nope, maybe.

150

00:20:33.298 --> 00:20:48.179

Okay, now I can Hi, how you doing thanks for, uh, everything you guys are doing and obviously for having the meeting tonight, I'm a West Seattle, uh, West Seattle light. Um, I live over here on on just about 35th over on high point.

151

00:20:48.179 --> 00:20:59.189

So, I just wanted to make a comment on the site that, uh, that's part 1 of the 1 of the, obviously regions. Can I ask you to hold that comment? That's about.

152

00:20:59.189 --> 00:21:02.308

A specific that would be. We.

153

00:21:02.308 --> 00:21:05.939

In a few minutes, if we're going to do comments on the draft and I think I know.

154

00:21:05.939 --> 00:21:12.509

That comment would be appropriate then this is just for clarifying questions about the process. The process right now.

155

00:21:12.509 --> 00:21:20.098

Does that include like that like the like the form, like, in terms of building size and things like that? Or is it should that common wait as well?

156

00:21:20.098 --> 00:21:23.909

What's your question about building size?

157

00:21:23.909 --> 00:21:30.179

I think the proposals for 50,000 square feet. Oh, that should wait for the comments yeah. Okay.

158

00:21:30.179 --> 00:21:37.739

Scott.

159

00:21:37.739 --> 00:21:40.828

I'm unmuted. Can you hear me.

160

00:21:40.828 --> 00:21:47.009

Yes, yeah, yeah, I just have a question during the process. Did you look at other cities?

161

00:21:47.009 --> 00:21:57.538

For examples, like, you know, Tacoma has done a major revamp of the waterway and has made environmental cleanup and sustainability a priority.

162

00:21:57.538 --> 00:22:03.929

And so has Vancouver Baltimore's waterfront did you just kind of stay with.

163

00:22:03.929 --> 00:22:10.169

What Seattle has done or did you look to other cities for inspiration or examples of what could be achieved.

164

00:22:10.169 --> 00:22:14.009

Yes, Scott, that would be a great comment. If that's something you think we.

165

00:22:14.009 --> 00:22:17.519

Should do, um, for the slate Thank you.

166

00:22:19.229 --> 00:22:27.328

Okay uh, and, uh, Scott, and you could put their hands down so we can get fresh hands up. Uh.

167

00:22:28.044 --> 00:22:41.153

You can comment we will now move into the comments section of the public hearing. So we're going to ask people to limit the conversation their comments for 2 to 3 minutes. We're not going to run a timer.

168

**Verbal  
Comment  
H3**

**H3-1**



**Verbal  
Comment  
H4**

00:22:41.933 --> 00:22:44.723

Just please respect the time of others and.

169

00:22:45.689 --> 00:22:49.648

So, raise your hand, if you do have a comment, you want to offer.

170

00:22:59.459 --> 00:23:08.278

Now, do, uh, thanks, uh, thanks for allowing me to to make a comment.

Sorry? For jumping the gun on that. Okay. Could you say your name.

171

00:23:08.278 --> 00:23:12.058

My name is, I don't know why it says D, but my name is, can you see me still.

172

00:23:12.058 --> 00:23:19.223

Yes, my name is Dennis Williams. Dennis Williams Jr like I said, live in West Seattle um, I've been in Seattle all my life.

173

00:23:19.223 --> 00:23:28.313

So, it's nice to see, uh, proposals that we can, um, change some of the land use policies to obviously increase employment and livability and all that kind of stuff.

174

00:23:28.313 --> 00:23:41.483

So, I just kind of wanted to come in on, on alternative for because includes a building size limits for 50,000 square feet currently but obviously suggesting that we raise it to 60,000 square feet or larger so that we can.

175

00:23:42.269 --> 00:23:48.298

Include alternatives for, for mixed use properties, like sports facilities and things like that on.

176

00:23:48.298 --> 00:23:55.888

Properties like the CM site, which is currently being, it's not been used for 50, 55 plus years.

177

00:23:55.888 --> 00:24:02.429

So, we're actually kind of looking to a proposal now where we can use that for a mixed use sports facility.

178

00:24:02.429 --> 00:24:10.199

But, of course, in that particular spot, there's no water access. There's no utilities to the site. No access to report operations.

179

00:24:10.199 --> 00:24:14.788

Uh, there's no history of any maritime or, um, industrial job. So it's.

180

00:24:14.788 --> 00:24:29.243

It's a perfect opportunity to again, add jobs, uh, make the make the space, uh, better for the entire region. Um, and just kind of just add value to Seattle in the broad, broad area at large. So just wanted to add that comment.

181

**H4-1**

00:24:29.243 --> 00:24:30.923  
And I appreciate the, your consideration.  
182

00:24:32.429 --> 00:24:39.118  
Thank you Laura.  
183

00:24:49.019 --> 00:24:54.298  
You unmuted now 1 of the things we were both meeting, and I'm meeting.  
184

00:24:54.298 --> 00:24:59.009  
Everyone my name is Laura. Lou, and I'm not just speaking for myself  
today.  
185

00:24:59.009 --> 00:25:03.719  
But I'm speaking on behalf of an organization called chair, the city's  
action fund.  
186

00:25:03.719 --> 00:25:07.169  
Who are a bunch of land use nerds? Um.  
187

00:25:07.169 --> 00:25:15.028  
That dug into this document and have been part of this process for a long  
time. Um, and we, um.  
188

00:25:15.028 --> 00:25:23.249  
We're 1st interested in this related to the Burt report, which came out  
from, um, and under the direction of the state.  
189

00:25:23.249 --> 00:25:26.423  
And then, um, have been digging into this more.  
190

00:25:26.634 --> 00:25:41.273  
We're definitely have a a focus on Ballard and inner bay industrial  
lands, and are looking to the communities in South Park, Georgetown and  
Soto to see, um, over the next few weeks what their comments are. Um.  
191

00:25:41.548 --> 00:25:53.068  
So, our comments tonight are are mostly limited to the valid inner bay  
industrial lands, because we really feel like the communities and the  
other parts of Seattle, um, have a really strong idea of what's best for  
them.  
192

00:25:53.068 --> 00:25:58.919  
So, I don't want to speak on their behalf or for them. Um, I'm an inner  
bay clean and resonant.  
193

00:25:58.943 --> 00:26:06.564  
And, um, my organization does focused on, like, kind of North or northern  
part of Seattle issues. Okay.  
194

00:26:06.594 --> 00:26:18.983  
So, um, I've, I've shared these in the past with the city, but, um, shows  
these action fund supports alternative for, um, we like that. It  
strengthens protections on 87% of industrial lands and.

H4-1  
cont.

H5-1

H5-2

Verbal  
Comment  
H5

195

00:26:20.699 --> 00:26:25.044

Includes additional flexibility for those caretaker industry, supportive homes.

196

00:26:25.344 --> 00:26:35.814

Um, 2000 over the scope of this project is not actually very many homes and we hope that we see, uh, protections in place to make sure that they are used as caretaker homes and not.

197

00:26:36.479 --> 00:26:45.568

Um, other uses, um, we have 5 big concerns. Um, we think that, um, there should be a story here framing.

198

00:26:45.568 --> 00:27:00.384

For counsel when they get this document around the historical redlining maps, and how they're aligned with our industrial lands, we, we love the equity pieces. You've included in each section, but having that map there, um, to tell that story would be powerful.

199

00:27:00.989 --> 00:27:06.328

To show how these growth patterns are rooted in past racial injustice. Um.

200

00:27:06.594 --> 00:27:10.163

We also think that the maps that don't every single map,

201

00:27:10.163 --> 00:27:19.284

that doesn't show all of Seattle is also telling a limited story in terms of other parts of Seattle that could have industrial areas,

202

00:27:19.614 --> 00:27:20.094

or,

203

00:27:20.124 --> 00:27:22.163

or some industrial uses in them.

204

00:27:22.433 --> 00:27:26.003

And I know that's outside the study area, but we really do need to consider.

205

00:27:26.249 --> 00:27:31.648

Industrial uses, um, maybe at Madison, or maybe in your light rail in North Seattle.

206

00:27:31.648 --> 00:27:44.933

Um, and leaving that out, seems like a big mission and then, um, especially since there's so much transit and late, real investment in that part of Seattle, to not have jobs near transit in a climate crisis, does it make sense to us?

207

00:27:45.503 --> 00:27:50.963

And then, um, we're concerned about the future vehicle traffic estimates that have maybe been taken from.

**H5-2  
cont.**

**H5-3**

**H5-4**

**H5-5**

208  
00:27:51.239 --> 00:27:58.409  
Studies like the birth study that we've been really critical of and the assumptions, um, the lack of including the greatest alternative.

209  
00:27:58.409 --> 00:28:04.469  
For the manual, you bridge replacement and and having anything to do with the the Burt report. Um.

210  
00:28:04.469 --> 00:28:07.618  
As a, as an underpinning of this work is concerning.

211  
00:28:07.618 --> 00:28:10.709  
Um, we wanted to see a lot of analysis by zone.

212  
00:28:10.709 --> 00:28:14.368  
And then last, but not least, um.

213  
00:28:14.368 --> 00:28:21.148  
This creates a very robust job growth path of of we saw that chart earlier for alternative for.

214  
00:28:21.263 --> 00:28:27.624  
And we're really concerned about the jobs to housing and balance right now originally.

215  
00:28:27.894 --> 00:28:40.314  
And, um, right now the way this stands on its own, without speaking to the future changes, that we hope to see in the residential areas, um, it's just kind of really doubling down on that job is to housing and balance.

216  
00:28:40.584 --> 00:28:52.463  
There'll be a housing crunch for middle wage workers, which doesn't just impact middle wage workers, because they'll outbid lower income workers for their housing. And there's a cascading effect that puts downward pressure.

217  
00:28:52.709 --> 00:28:57.118  
People with lower incomes and, and, um, has been shown.

218  
00:28:57.118 --> 00:29:10.284  
With very good data, it leads to a homelessness crisis in the cities where we have that job's to housing and balance. That's the biggest predictor of homelessness. Um, so really, really alarming. Um, we do want jobs.

219  
00:29:10.284 --> 00:29:12.324  
We do want these kinds of middle wage jobs.

220  
00:29:12.568 --> 00:29:23.818  
Um, when when our industrial lands are public storage facilities and big box stores, and even sports facilities, we're not sure if that's the kind of middle wage.

H5-5  
cont.

H5-6

H5-7

221

00:29:23.818 --> 00:29:27.568

Higher middle wage jobs that we are supposed to be preserving.

222

00:29:27.568 --> 00:29:36.749

So, we just want to really make sure that the uses stay, um, with that kind of North Star, that the city had of those higher middle wage jobs and, and don't get into kind of the lower.

223

00:29:36.749 --> 00:29:40.348

Lower job a lower wage jobs, which, um.

224

00:29:40.348 --> 00:29:43.558

You know, aren't going to help people be able to live in Seattle.

225

00:29:43.558 --> 00:29:51.298

With the high costs that we expect to see over the next few decades continuing. So those are all my comments. Um.

226

00:29:51.298 --> 00:29:59.249

And again, we're really excited to see, um, what the folks in other parts of Seattle have to say, um, in areas and, um.

227

00:29:59.249 --> 00:30:13.138

We are really happy with this report, especially in contrast with our concerns with the report. We feel like this report was much more clear about the urgency of climate change, much more clear about inequity much more clear.

228

00:30:13.138 --> 00:30:18.568

About creating, you know, less training, more transit use and less.

229

00:30:18.568 --> 00:30:23.519

Dependency and and then we just want to highlight 1 more thing, which is at the 2.

230

00:30:23.693 --> 00:30:24.503

Level of service,

231

00:30:24.503 --> 00:30:38.394

or the 2% of in the valid in the area is freight and while we absolutely respect and love our freight folks and the work they do to get at our communities goods around,

232

00:30:38.394 --> 00:30:38.933

um,

233

00:30:39.233 --> 00:30:44.814

just making sure that the future land use and the roads and stuff are friendly for pedestrians.

234

00:30:45.929 --> 00:30:54.959

In the proportion of that we're represented in that study so thank you for my long comments. And you guys agree and we appreciate you.

**H5-7  
cont.**

**H5-8**

**H5-9**

**Verbal  
Comment  
H6**

235

00:30:58.199 --> 00:31:11.398

Any other comments you unmuted.

236

00:31:11.398 --> 00:31:15.808

All right, my name is Scott. I am a, a.

237

00:31:15.808 --> 00:31:21.088

Urban waterfront enthusiast planner developer type originally from Baltimore.

238

00:31:21.088 --> 00:31:31.169

Uh, I'm also a, um, uh, competitive Rower, kind of in in my spare time. So I am also an avid urban waterfront recreation enthusiast.

239

00:31:31.169 --> 00:31:36.689

Just a couple of comments I'll try to keep it in 3 minutes. I strongly support option for.

240

00:31:36.689 --> 00:31:41.338

Regardless of which option there should be greater focus.

241

00:31:41.513 --> 00:31:52.794

On general public benefits, such as better public access to the waterfront sustainability and requirements for ground level landscape open space and buyer bio swells.

242

00:31:53.034 --> 00:32:03.413

Seattle is 1 of the only port cities in the United States that does not have a provision or requirement for public access or green space to mitigate the pollution caused by heavy industry.

243

00:32:03.719 --> 00:32:07.288

We need to develop a true 21st century industrial district.

244

00:32:07.288 --> 00:32:10.979

Which finally acknowledges and offsets the real impacts on the earth.

245

00:32:10.979 --> 00:32:18.628

And on the environment, any option approves should have a strong sustainability requirement. This could include height or density bonuses.

246

00:32:18.628 --> 00:32:22.259

We're incorporating more sustainable site or building features.

247

00:32:23.394 --> 00:32:37.074

Land Houston should be flexible to allow for industrial artists, live work opportunities and workforce housing, especially near light rail stations since the 990 s, affordable artists live work, housing and new construction has been excluded from Ben. Mick.

248

00:32:38.219 --> 00:32:45.868

Ironically, each new building on the salmon bay waterfront includes several Ultra luxury caretaker units.

**H6-1**

**H6-2**

**H6-3**

249  
00:32:45.868 --> 00:32:49.229  
And I don't believe that's very equitable. Um.

**H6-3**  
**cont.**

250  
00:32:49.229 --> 00:32:49.913

The stadium,  
251

00:32:49.943 --> 00:32:51.473  
the stadium overlay,  
252

00:32:51.773 --> 00:32:58.973  
the stadium overlay transition districts should be strongly considered as  
an urban entertainment and arts district,  
253

00:32:59.003 --> 00:32:59.574  
which is what,  
254

00:32:59.574 --> 00:33:00.023  
most,  
255

00:33:00.084 --> 00:33:04.763  
most other cities have done to leverage the in public investment in their  
stadiums.  
256

00:33:05.183 --> 00:33:11.903  
This is especially relevant given that heavy traffic during games. And  
concerts has had a major impact on on industrial.  
257

00:33:12.239 --> 00:33:17.368  
Substantial new taxes generation generated by higher density uses.  
258

00:33:17.368 --> 00:33:23.308  
Near the stadiums could be used to invest in infrastructure and mobility  
improvements elsewhere.  
259

00:33:23.453 --> 00:33:31.523  
In the mic, and also there has been little or no investment or  
development to date near the stadiums or near the Soto light rail  
stations.  
260

**H6-5**

00:33:32.003 --> 00:33:39.653  
The soda light rail station should be resumed to encourage a vibrant  
industrial arts maker live work village.  
261

00:33:39.959 --> 00:33:54.743  
Possibly with affordable housing and small business opportunities to  
compliment the maker spaces and identity industrial there is very strong  
demand for both workforce, housing and artist housing in Georgetown. So I  
think that's a great aspect of, um.  
262

00:33:55.259 --> 00:33:58.949  
Of, uh, options 3 and 4 to acknowledge this.  
263

00:33:59.663 --> 00:34:08.153

I also encourage the zone should allow for minimum residential heights of 65 feet or 85 feet when, in close proximity to light rail station.

**H6-5  
cont.**

264

00:34:08.153 --> 00:34:14.844

And then finally, I think it's really important that we look at the areas that are under utilized or vacant industrial land.

**H6-6**

265

00:34:16.289 --> 00:34:28.253

Because these may be opportunities for us to think creatively, and strategically to plan for unique and innovative, industrial, mixed use developments. That can really help both economic and neighborhood development.

266

00:34:28.614 --> 00:34:42.414

There's plenty of under utilized and vacant land in the mix. And now would be a good time for us to examine them and put our minds together and think how we can best incorporate multiple uses. So thanks again, you guys, I appreciate the opportunity.

267

00:34:42.748 --> 00:34:48.148

Thank you Scott, does anybody else wish to comment.

268

00:34:58.679 --> 00:35:05.458

Okay, so it's 1 comment per person. Uh, thank you.

269

00:35:15.898 --> 00:35:27.478

All right, seeing none. Jeff, do you see here? There's, I'm missing. Um, no, I don't see any of their hands. Um, I just do want to say that, um, for for Dennis and anyone else, who wishes to submit.

270

00:35:27.478 --> 00:35:31.079

Additional comments, um, uh.

271

00:35:31.079 --> 00:35:34.318

The written comment that's E, mailed to us.

272

00:35:34.318 --> 00:35:37.889

It's just as good as a verbal comment at this hearing.

273

00:35:37.889 --> 00:35:43.349

So, yeah, I want to think Dennis and Laura and Scott.

274

00:35:43.349 --> 00:35:51.329

For your verbal comments tonight, but, um, if you didn't get everything in there that you wanted to say, please just email a written comment.

275

00:35:53.608 --> 00:35:59.699

All right with that, we are concluding our hearing Thank you for joining us tonight and.

276

00:35:59.699 --> 00:36:08.039

If you have questions, please going forward if you preparing comment, please reach out to us we're available to talk and answer questions.

277



00:36:15.239 --> 00:36:16.079  
Tonight.