

2.1 Introduction

2.1.1 Overview of the Proposal

Seattle's industrial and maritime policies are more than 35-years old and during that time, the trends and technologies impacting industrial and maritime users have experienced significant change. To reflect those changes as part of a comprehensive strategy to strengthen and grow Seattle's industrial and maritime sectors for the future, the City of Seattle is studying a proposal to update its industrial and maritime policies and industrial zoning. The proposal is informed by recommendations from community input, including an Industrial and Maritime Strategy Council, which resulted in an Industrial and Maritime Strategy Report that the City of Seattle released in June 2021 (Appendix B).

This Environmental Impact Statement (EIS) studies four alternatives illustrating different potential futures for the city's industrially-zoned lands. The four alternatives evaluate the effects of potential changes to Comprehensive Plan policies and changes to zoning over a 22-year time horizon (to 2044). The first alternative is a No Action alternative that is required by the State Environmental Policy Act (SEPA) and is a basis for comparison. The three Action Alternatives (alternatives 2, 3, and 4) all apply proposed "future of industry" land use concepts that are based on community input and intended to respond to issues, challenges, and opportunities for the maritime and industrial sectors and adjacent communities.

The future of industry land use concepts consist of three proposed new industrial zones:

What is an Alternative?

Alternatives are different ways of achieving objectives that allow decisionmakers to compare the effects of different options. The No Action Alternative is based on current plans, policies, and regulations and is a benchmark against which other alternatives can be measured. Action alternatives can test a range of ideas, implications, and benefits. The Alternatives in the EIS will consider Comprehensive Plan policy amendments and different configurations for possible zoning changes and development standards to achieve the maritime and industrial land objectives.

- Maritime Manufacturing and Logistics (MML)—This zone would focus on strengthening land use protections for core and legacy industrial and maritime areas to better prevent the encroachment of development that is incompatible with industrial and maritime uses. This zone is particularly applicable within Seattle's Manufacturing/Industrial Centers (MICs), near the shoreline or deep-water port, rail and freight infrastructure, and around existing clusters of industrial or maritime suppliers and services.
- Industry / Innovation (II)—This zone aims to encourage new development in multi-story buildings that accommodate industrial businesses mixed with other dense employment uses such as research, design, offices, and technology. By creating density bonuses for employment uses (i.e., office, R&D, etc.) if coupled with industrial uses in the same project,

this type of modern industrial development would support high-density employment near transit stations and near existing industrial-commercial areas.

• Urban Industrial (UI)—This zone is designed 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 to create better, integrated, and healthier transitions at the edges between industrial areas and neighboring urban villages, residential, and mixed-use areas.

To implement the future of industry land use concepts in each of the Action Alternatives the City of Seattle would:

- Amend the comprehensive plan to add new text policies describing the intent and vision for how these concepts would be applied, including land use, environment, and transportation;
- Amend the industrial zoning section of the land use code to create a new zone designations and corresponding development standards replacing the existing industrial zones;
- Apply new industrial zone classifications to industrial land; and
- Adopt new subarea plans for both the Ballard Interbay Northend and Greater Duwamish Manufacturing Industrial Centers (MICs).

However, each of the alternatives evaluated in this EIS pose different percentages of the future land use concepts in industrial and manufacturing lands for the purpose of strengthening and growing Seattle's industrial and maritime sectors in the future, as set out in **Section 2.4.1** of the EIS. The multi-faceted objectives of the proposal are listed in **Section 2.2** below.

The following is a brief summary of the four alternatives, which are described further in **Section 2.4** below.

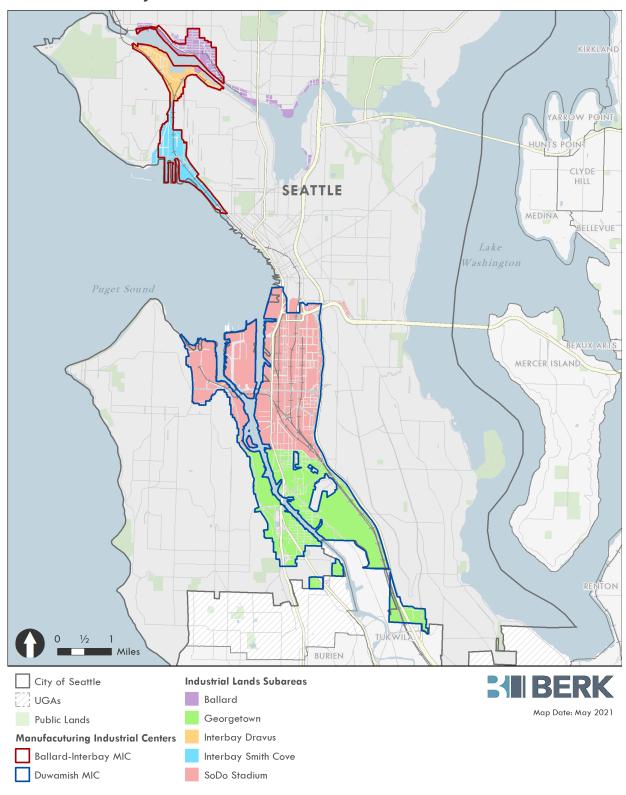
- Alternative 1—No Action: The SEPA-required alternative that would retain current Comprehensive Plan policies, development standards or zoning maps.
- Alternative 2—Future of Industry Limited: Alternative 2 retains current MIC boundaries. Alternative 2 would implement future of industry land use concepts with a greater emphasis on strengthening protections for core and legacy industrial and maritime activities. The proposed MML zone would cover approximately 90% of 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
- Alternative 3—Future of Industry Targeted: Alternative 3 would strengthen protections for core industrial uses in the MML zone on approximately 86% of industrial lands. It applies a mix of the proposed II and UI zones in targeted geographies covering 14% of industrial lands. Compared to Alternative 2, II zoning is expanded to include areas an estimated 1/2 mile from light rail stations, and UI zoning would be applied in additional areas in Ballard

- and the north shore of Lake Union. Alternative 3 creates limited flexibility for additional industry-supportive housing in UI zone that would result in an estimated 610 new homes in industrial zones. Alternative 3 removes focused land in Georgetown / South Park from the MIC and converts it to a non-industrial mixed-use zone.
- Alternative 4—Future of Industry Expanded: Alternative 4 would also strengthen protections for core industrial uses in the MML zone on approximately 87% of industrial lands. Similar to Alternative 3, Alternative 4 would mainly apply II zoning in existing IC zones and within approximately a 1/2 mile from light rail stations, though with a greater expansion of the II zone in areas in Ballard and SODO. Compared to Alternative 3, the UI zone would be applied to a larger area in SODO, but to fewer areas in Ballard. This alternative includes additional flexibility for industry-supportive housing that could result in an estimated new 2,195 new homes in industrial zones. Just like Alternative 3, Alternative 4 removes focused land in Georgetown / South Park from MICs and convert it to a non-industrial mixed-use zone.

2.1.2 Study Area

Most industrial land in Seattle is located within two Manufacturing Industrial Centers (MIC): Seattle's Greater Duwamish Manufacturing and Industrial Center (Greater Duwamish MIC) and Ballard Interbay North Manufacturing Industrial Center (BINMIC). Within the MICs, subareas are defined—Ballard, Interbay Dravus, Interbay Smith Cove, SODO/Stadium, and Georgetown/South Park. The Greater Duwamish MIC and BINMIC contain 12% of Seattle's total land area. Other industrially zoned land that is outside a MIC is included in the study area, most of which is on shorelines of Lake Union and by Judkins Park See **Exhibit 2.1-1**.

Exhibit 2.1-1 Study Areas



Source: BERK, 2021.

2.1.3 Objectives of the Proposal

The State Environmental Policy Act (SEPA) requires a statement of proposal objectives and the purpose and need to which the proposal is responding. Alternatives are different means of achieving the objectives.

The proposal would update Comprehensive Plan policies concerning industrial land and update the city's industrial zoning. The objectives behind this proposal are multi-faceted and seek to address the City's industrial and maritime sectors holistically. The objectives are informed by the recommendations of an Industrial and Maritime Strategy stakeholder process. Objectives are identified in four overlapping categories of people, place, and production and process. See **Exhibit 2.1-2**.

Exhibit 2.1-2 Objectives of the Proposal

People

- A. Increase the quantity of living wage jobs generated from activity on Seattle's currently designated industrial lands.
- B. Improve equitable access to the living wage jobs from these lands by increasing the proportion of the jobs held by: racial minorities, women, and persons without traditional 4-year college diplomas.
- C. Improve environmental health for people who live or work in or near industrial areas—especially at transitions to residential areas or urban villages.

Place

- D. Provide long-term predictability to stakeholders that will support renewed investment in facilities, buildings, and infrastructure
- **E.** Promote mutually reinforcing mixes of activities at the transitions between industrial areas and urban villages or residential neighborhoods.
- F. Support industrially compatible employment dense transit oriented development at existing and future high capacity transit stations.
- **G.** Increase access to workforce and affordable housing for employees in industrial maritime sectors, without creating land use conflicts that displace industrial uses.

Production

- H. Position Seattle's industrial areas to respond competitively to new industrial and manufacturing processes and practices.
- I. Ensure available and adequate locations for components of regional and statewide supply chains and regional economic clusters.
- J. Increase the amount and accessibility of space for prototyping, entrepreneurship, and business incubation.
- K. Strengthen economic resiliency with the capacity to produce products locally and ensure stable distribution networks.

Process

- L. Develop Comprehensive Plan policies based on the Industrial and Maritime Strategy.
- M. Develop a subarea plan for the MICs that supports VISION 2050, accommodates growth targets, and the Puget Sound Regional Council Regional Centers Framework for MICs.

2.2 Planning Context & Outreach

2.2.1 Emerging Factors Affecting Seattle's MICs

MICs are regional designations and are defined in the City's Comprehensive Plan as home to the city's thriving industrial businesses. Like urban centers, they are important regional resources for retaining and attracting jobs and for maintaining a diversified economy. Seattle's manufacturing and maritime sectors generate middle-wage jobs that are cornerstones of a thriving and livable city. 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.

Since MICs were established in 1994 there have not been largescale alterations to their geographic boundaries. Today, zoning within MICs must be one of four industrial zones in the Seattle Municipal Code (SMC). Those zones regulate the uses and activities that can take place in industrial areas, limiting them to prioritize manufacturing and industrial activities envisioned by the comprehensive plan. While manufacturing and maritime sectors today are strong, emerging factors affecting them include:

- 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

Pressures to Convert Industrial Lands

On a consistent basis, the City receives requests to remove parcels of land from a MIC designation from one of the industrial zones during the annual Comprehensive Plan amendment process. While growth rates in industrial rents were the highest in the world in 2017, average rental rates for commercial space are about three times higher than for industrial space. The requests amount to continual pressure to convert industrial land to other uses. This continues to create significant economic pressures to rezone industrial land for other uses.

Emerging Technologies & Processes

Definitions of Industrial uses in the Comprehensive Plan and in the Seattle Municipal Code may not reflect current standards of industrial activity. Some observers argue that new technologies and economic processes warrant reconsideration of definitions for what industrial and maritime use means, and/or reconsideration of the potential for compatible mixes of industrial uses with other activities.

Unintended Development

In recent years, some development in designated MICs was not intended to be allowed by zoning and is not compatible with the stated policy goals for industrial areas. For example, large retail stores do not complement the function of an industrial area, have no need to be in an industrial area, and often displace industrial uses.

Pending Port, Transportation, & New Industrial Building Typology

The City is experiencing several catalysts for further change in industrial areas, including:

- 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;
- Sound Transit's development of new light rail stations in Ballard, Dravus, Smith Cove (Interbay), and SODO;
- The State's intentions for the sale and redevelopment of the armory site in Interbay and potentially the WOSCA site in the Duwamish MIC; and
- New industrial development in non-traditional, vertical development.

Climate Change

Seattle's industrial areas that are undergoing economic change and infrastructure investment and its neighboring communities are also facing acute risk from rising sea levels, increased floods, and extreme heat.

Equity & Accessibility

Historically, unequal access to the career opportunities provided by maritime and other industrial sectors has been a barrier to people of color to share in the benefits of this activity. Providing entryways to these careers for Black, Indigenous, and people of color (BIPOC) communities and women is one way that Seattle can advance its commitment to an equitable economy. Maintaining a strong industrial economy is a prerequisite to providing these opportunities, but other strategies including outreach to BIPOC youth and workforce training investments are key parts of the industry and maritime strategy.

2.2.2 Equity & Environmental Justice

The study area includes territories of indigenous tribes; Euro-American settlement and industrial development altered the natural character of this area and impacted tribal treaty rights. Since settlement the study area has had a growing industrial and maritime economy connected to the Puget Sound Region and West Coast.

Current conditions information indicates that the study area contains few housing units but is bordered by residential areas and nearby schools; the study area also contains parks that visitors use. These residents and users of the study area have a higher relative exposure to air emissions, noise, and light and glare. Some lands in the study area contain hazardous waste or cleanup sites. These environmental conditions also affect the large numbers of workers that come every day to the study area and then commute to homes either elsewhere in Seattle or in King County and beyond.

This section describes some of the environmental justice principles and actions that are under consideration as the alternatives are reviewed.

Equity & Environment Agenda

The City of Seattle has committed to environmental justice for persons of color, low-income households, and others disparately affected by historic decisions on land uses and infrastructure that affect housing, health, and other aspects of quality of life. The City has created an Environmental Justice Committee. The body has developed an Equity and Environment Agenda with the following vision:

We are steadfast in our pursuit of Environmental Justice, redefining our environment as not just the natural environment, but also where we work, worship, play, learn and live. We believe in a world that respects communities' histories and cultures, and that uplifts self-determination and full participation. We know that communities of color are creative, resourceful and resilient, and deeply care about the environments in which they live. Given that, we believe in environmental solutions that connect to and create economic and educational opportunities so that all communities can thrive. To do this necessitates addressing past systemic injustice while creating proactive, transformational solutions for the future.

The Equity and Environment Agenda is also based on the following principles:

- Community Driven Strategies: We believe in community self-determination, influence and leadership. We know that communities are resilient and resourceful, and that tapping into their own collective cultural cornerstones of environmental sustainability is key to ownership of initiatives and other efforts, as well as reducing invisibility.
- The Influence and Decision-Making of Those Most Affected: We believe that communities who are deeply affected by environmental issues should be highly involved throughout decision-making processes in meaningful and culturally appropriate ways.

- Strong Accountability: We believe that affected communities deserve strong, accountable, transparent, accessible, and culturally appropriate solutions that include ongoing oversight of government and other entities to address the negative impacts they have experiences.
- Solutions That Recognize Complexity and Interdependence: We believe in doing no harm, here or anywhere. We recognize that all places and people are interconnected, and commit to an approach of collective liberation, which recognizes that the liberation of each person is the liberation of all people.

Chapter 1, Section 1.7.15, of this Draft EIS addresses findings of the alternatives and relationship to environmental justice and equity. **Chapter 3, Section 3.8** addressing land use includes an overview of past land use policies and other actions that had inequitable outcomes.

Duwamish Valley Program & Action Plan

The City's <u>Duwamish Valley Program</u> worked with the Duwamish Valley Action Team (DAT) to develop the Duwamish Valley Action Plan to advance environmental justice and equitable development.

The Action Plan promotes racial equity outcomes through mid-term actions:

- Healthy Communities
- Thriving Neighborhoods
- Prosperity in Place
- Employment and Economic Opportunity
- Equitable Access to City Resources, Accountability, and Decision-making
- Community Leadership and Capacity Building

Each outcome is defined in **Exhibit 2.2-1**. Detailed actions for each outcome are in the Action Plan.

Exhibit 2.2-1 Duwamish Valley Action Plan Racial Equity Outcomes

RACIAL EQUITY OUTCOMES

The Duwamish Valley Action Plan is advancing racial equity through mid-term actions. Find these icons throughout the Action Plan.



1. Healthy Communities

Reduce health disparities and cumulative impacts present in the Duwamish Valley related to air and water quality, soil contamination, noise pollution, access to healthy food, and climate change adaptation that disproportionately affect Duwamish Valley residents and workers, including communities of color, immigrants, refugees, Native peoples, people with low incomes, youth, and limited English proficiency individuals.



2. Thriving Neighborhoods

A safe, connected, and accessible Duwamish Valley, with a focus on South Park and Georgetown, with amenities and physical improvements that benefit Duwamish Valley residents and workers, including communities of color, immigrants, refugees, Native peoples, people with low incomes, youth, limited English proficiency individuals, women- and minority-owned businesses, and people of color-led organizations.



3. Prosperity in Place

City policies and investments in the Duwamish Valley proactively prevent displacement risk so Duwamish Valley residents and workers, including communities of color, immigrants, refugees, Native peoples, people with low incomes, youth, and limited English proficiency individuals, women- and minority-owned businesses, and people of color-led organizations, enjoy a robust life and prosper in place.



4. Employment and Economic Opportunity

Duwamish Valley residents and workers, including communities of color, immigrants, refugees, Native peoples, people with low incomes, youth, limited English proficiency individuals, womenand minority-owned businesses, and people of color-led organizations, have economic mobility and opportunity through access to education, training, funding, and support programs, as well as pathways out of poverty through jobs and careers related to environmental policy and program and project development.



5. Equitable Access to City Resources, Accountability, and Decision-making

Duwamish Valley residents and workers, including communities of color, immigrants, refugees, Native peoples, people with low incomes, youth, limited English proficiency individuals, and women and people of color-owned businesses, meaningfully influence the design and participate in decision-making processes regarding City policies, programs, and services benefitting/affecting the Duwamish Valley. City decision-makers are responsive and accountable to Duwamish Valley residents and workers.



6. Community Leadership and Capacity Building

City programs, projects, investments, and engagement strategies are led, centered, and support the diverse cultures, stories, and experiences of Duwamish Valley residents and workers; a specific focus will be given to communities of color, immigrants, refugees, Native peoples, people with low incomes, youth, limited English proficiency individuals, and women and people of color-owned businesses. City policies and programs in the Duwamish Valley invest directly in leadership development, capacity building, and community-led solutions.

Source: Duwamish Valley Action Plan, 2018.

2.2.3 Mayor's Industrial & Maritime Strategy

In 2019 Mayor Durkan convened an Industrial and Maritime Strategy Advisory Council to chart a blueprint for the future of industrial land in Seattle with a focus on providing equitable access to high-quality, family-wage jobs and entrepreneurship opportunities. The Advisory Council included representation from citywide stakeholders and stakeholders from four neighborhood subareas. Stakeholders represented a diverse range of interests including maritime and industrial businesses, labor, residents of adjacent neighborhoods, developers, and industry groups.

- The Citywide Advisory Council consisted of representatives from industry, neighborhoods, and labor from across the city. It met more than ten times over a year and a half and included various phases and levels of dialogue. At each stage, council meetings were supplemented with individual outreach and dialogue between members of the strategy council, city staff, and the facilitator.
- The four neighborhood-based advisory councils consisted of representatives from subareas within and adjacent to Manufacturing Industrial Centers. Neighborhood Advisory Councils were convened for Ballard, Georgetown and South Park, Interbay, and SODO. Top issues and vision statements from each subarea were distilled to key themes. Neighborhood Advisory Council members were also attended and provided input at the full Citywide meetings.
- In parallel with the advisory councils, City staff worked with youth serving organizations to design and conduct engagement specifically targeted to **BIPOC youth**. This engagement resulted in direct dialogue, and a pre- and post-survey with over a hundred BIPOC youth to learn about their experiences accessing education, training, or employment opportunities in industrial maritime sectors.

In May 2021 the Advisory Council recommended **11 broad strategy statements to guide future actions** to support the maritime and industrial sectors, and advance equitable access to family-wage employment, particularly for BIPOC youth. See **Exhibit 2.2-2**.

The key land use recommendations of the stakeholders informed the EIS alternatives. Some of the strategies could be mitigation measures for impacts that are identified. Other strategies from the process that are not related to land use would be implemented through other City actions outside of the proposal studied in this EIS.

Exhibit 2.2-2 Industrial and Maritime Strategy Stakeholder Recommendations

Investment Strategies

- 1. Workforce Investments to Support Access to Opportunity for BIPOC, Youth, and Women: Create, expand, and support initiatives that increase access to opportunity and economic prosperity for Black, Indigenous, and People of Color, youth, and women through manufacturing, maritime, and logistics careers.
- 2. Public Safety Partnership to Support Maritime and Industrial Areas: Work closely with local business and community organizations to develop and implement a proactive public safety response to elevated levels of crime within maritime and industrial lands.
- 3. Transportation Priorities to Improve the Movement of People and Goods: Improve the movement of people and goods and make transit and freight networks work for industrial and maritime users with better service and facilities; improved last mile connections for active transportation, transit, and freight, including large truck access to shoreline and railroad uses; and advocating for a tunnel alignment for Ballard and Interbay future light rail.
- **4. Environmental Justice and Climate Action:** Address environmental inequities and protect industrial adjacent communities from environmental harms, transition to a climate pollution free freight network, and prepare for a changing climate.

Land Use Strategies

- **5. Stronger Protections for Industrially Zoned Land:** 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.
- **6. High Density Industrial Development:** Encourage modern industrial development that supports high density employment near transit stations and near existing industrial-commercial areas by creating density bonuses for employment uses (i.e., office, R&D, etc.) if coupled with industrial uses in the same project.
- 7. Healthy Transitional Areas near Urban Villages: 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.
- **8.** No New Residential Uses: No new residential uses on industrial and maritime lands. Limited adjustments to existing allowances in transitional zones to support industry and arts entrepreneurship opportunities. Any limited adjustments to existing allowances in transitional zones would be determined after additional study of potential impacts, including an Environmental Impact Statement (EIS).
- **9. Georgetown and South Park Neighborhood Goals:** Remove a few small, focused locations from industrial zoning in Georgetown and South Park and convert them to mixed-use zoning to achieve neighborhood goals.

Action Strategies

- 10. Master Planning for WOSCA and Armory Sites: Recognizing the time limitations of this process and the specialized nature of these sites, partner with agencies of the State of Washington, Department of Transportation (WOSCA), and Department of Commerce (Armory), or future owners on a master planning process for industrial redevelopment specifically designed for each site based on the guiding principles of this workgroup.
- 11. Ongoing Stewardship Entities to Champion this Vision: Identify and grow ongoing stewardship entities with a complete range of stakeholders to champion the vision of the Industrial and Maritime Strategy, ensure its long-term implementation, and develop appropriate assessment metrics to help guide future policy decisions. In different neighborhoods, this could be an existing organization with a modified charter and/or a new organization.

Source: Industrial and Maritime Strategy Council Recommendations, May 2021.

2.3 SEPA Process

2.3.1 Environmental Review Process

Under SEPA agencies conduct environmental review of actions that could affect the environment. For actions that have the potential for significant impacts, preparation of an EIS is required. An EIS is a useful tool that provides detailed information to the public, agencies, tribes, and City decision-makers about the environmental effects of a plan or project before a decision is made. As described in Chapter 1, this document is a non-project EIS that analyzes the proposals and alternatives broadly across the study area. (WAC 197-11-442)

The EIS process involves the following steps: (1) scoping the contents of the EIS with agencies, tribes, and the public; (2) preparing a draft EIS with a comment period; (3) responding to comments and developing a preferred alternative; and (4) developing legislation. With the issuance of the Draft EIS, the EIS process is in phase 2. See **Exhibit 2.3-1**.

(1) SCOPING (2) DRAFT EIS (3) FINAL EIS Summer 2021 December 2021 Spring/ Summer 2022 30-Day 45-Day Summer/ Comment Period Comment Period Responds to Comments Fall 2022 **Evaluates Preferred** Alternative

Exhibit 2.3-1 EIS Process

Source: BERK, 2021.

2.3.2 Public Comment Opportunities

Scoping

The scoping process is intended to identify the range of potential significant impacts on the built and natural environment that should be considered and evaluated in the EIS. The City issued a Scoping Notice on July 8, 2021 with a 30-day public comment period that ran through August 9, 2021 and was extended on request to August 23, 2021. Virtual scoping meetings were held during the comment period at 9:00 a.m. on July 21 and 6:00 p.m. on July 26, 2021. The City also published an information website and online survey as part of scoping.

The input received during the scoping period included:

- Written Comments: 105 letters and emails by 103 commenters
- Survey: 46 participants
- Public meeting participants: 7 participants

See **Appendix A** for the scoping report.

As part of scoping, the City identified a range of topics to explore in the EIS:

- Natural and Biological Resources and Resiliency: Soils/Geology, Air Quality/Greenhouse Gas, Water Resources, Plants and Animals
- Environmental Health and Compatibility: Contamination, Noise, Light and Glare
- Working, Living, and Mobility: Land and Shoreline Use, Housing, and Transportation
- Cultural and Recreational Resources: Historic, Archaeological & Cultural Resources, Open Space and Recreation
- Public Services and Utilities: Police, Fire, Schools, Libraries, Wastewater, Stormwater, and Power

Scoping comments indicated that air quality/greenhouse gas, contamination, transportation, and land and shoreline use were most important to address in the EIS. Commenters also gave input on alternatives to be studied, typically by indicating which of the scoping alternatives fit their views of the area or properties, or requesting adjustments. In response to the scoping comments one alternative was modified to include an evaluation of potentially increasing the size of use limit on indoor recreation facilities from 10,000 square feet to 50,000 square feet. A full response to scoping comments can be found in the Scoping Report.

Draft EIS

This Draft EIS identifies environmental conditions, potential impacts, and measures to reduce or mitigate any unavoidable adverse impacts that could result from an update to policies and zoning for Seattle's maritime and industrial sectors. The Draft EIS alternatives and topics were developed based on a review of scoping comments and prior Industrial and Maritime Strategy engagement results.

Public and agency comments are invited on this Draft EIS. Written and verbal comments are invited during the 45-day public comment period following issuance of this Draft EIS. The City will hold future public engagement events during or following the 45-day comment period to help refine its preferred alternative. Public comments will be considered and addressed in the Final EIS. Please see the Fact Sheet at the beginning of this Draft EIS for the dates of the public comment period and public meeting. Meetings and comment periods regarding the proposals are described on the City's project webpage: Industrial and Maritime Strategy—OPCD Industrial and Maritime Strategy <a

Final EIS & Proposed Legislation

A Final EIS will be issued in 2022 and will include responses to public comments received during the Draft EIS comment period. Following the EIS process, the City will develop specific policy and zoning proposals that will be the subject of public meetings and public hearings by the City Council.

2.4 Proposed Action & Alternatives

The proposal considers Comprehensive Plan policy amendments and changes to zoning and development standards that could help meet the objectives defined in **Section 2.1.3**. The EIS includes three future of industry alternatives (alternatives 2, 3, and 4) that would make different geographic combinations of zoning changes and degrees of change to development standards in industrial zones. A No Action Alternative with no changes to policies or zoning is also considered. The EIS addresses land use compatibility, and consistency with City and State plans and regulations.

2.4.1 Land Use Concepts

The future of industry alternatives (alternatives 2, 3, and 4) would apply proposed new land use concepts that are based on community input and intended to respond to issues, challenges, and opportunities for the maritime and industrial sectors and adjacent communities.

Three proposed land use concepts are integrated to different degrees in the future of industry alternatives and include:

- Maritime, Manufacturing, and Logistics (MML)
- Industry and Innovation (II)
- Urban Industrial (UI)

A description of concept is provided below, and following that a full description of each alternative and how it assimilates the land use concepts.

Maritime, Manufacturing, and Logistics (MML)

The Maritime, Manufacturing, and Logistics (MML) land use concept would intend to strengthen established economic clusters and expand equitable access to jobs. Seattle's industrial areas host valuable economic clusters including fishing, logistics, maritime, aerospace, brewing and distilling, and others that depend on access to water or other irreplaceable supporting infrastructure. MML would be applied in locations near such infrastructure and would strengthen the policy and zoning protections for maritime and industrial uses. See **Exhibit 2.4-1.**

Proximity to rail, ports, waterways, and freight corridors.

Long-term predictability facilitates new investments by industrial businesses.

Other industrial zones provide buffers.

Exhibit 2.4-1 Maritime Manufacturing and Logistics Proposed Land Use Concept

Challenges Addressed

- Market pressure for conversion away from industrial land.
- Vulnerabilities due to the interdependence of business within clusters.
- A pattern of "one off" zoning decisions that have removed industrial land.
- Encroachment of non-industrial uses in industrial zones.

Features/Development Standards

- Strictly limit allowable uses to industrial, manufacturing, maritime and similar uses.
- Do not allow new residential uses.
- Strict maximum size of use limits on non-industrial uses such as retail, office, and restaurants.

Industry and Innovation (II)

The Industry and Innovation (II) land use concept would intend to support economic innovation and capitalize on emerging opportunities including expanded or new light rail stations in industrial areas. It would intend to support emerging formats for industrial activity that are more design and research oriented than traditional industrial uses. It would intend to introduce nodes of high-density employment and multi-modal access near transit. Industry and Innovation would also intend to encourage new investment in high quality industrial space. See **Exhibit 2.4-2**.

Employment-denee, multi-story mixed use development with industrial in a portion of the structure.

Safe, comfortable circulation routes for non-motorized travel. Trees and landscaping to support environmental health.

Bicycle routes.

Within a 5 to 10 minute walking

Exhibit 2.4-2 Industry and Innovation Proposed Land Use Concept

Challenges Addressed

- Industrial zoning hasn't been updated to reflect contemporary industrial methods.
- Lack of new investment (buildings & infrastructure) in industrial areas.
- Integration of high-capacity transit in industrial areas (ST3).
- High rent for office and tech uses make it difficult for industrial businesses to find space affordable to them.
- Lower density of jobs in distribution / warehouse uses.

Features/Development Standards

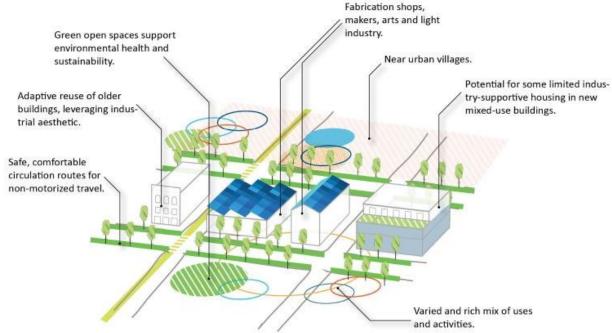
distance from the station.

- An incentive structure allowing some non-industrial office or technology uses if a new bona-fide industrial space is included in the same development. Industrial uses would be likely to locate on the ground floor and/or second floor.
- A substantial increase in allowed floor area and height limits compared to existing industrial zones that would allow dense multi-story buildings.
- Minimum construction standards for bona-fide industrial space such as freight elevators, minimum clear ceiling heights, and load-bearing floors.
- Standards for pedestrian and cyclist-oriented frontage improvements.
- Vehicle parking maximums and strong commute trip reduction program requirements.

Urban Industrial (UI)

The Urban Industrial (UI) land use concept would intend to foster vibrant districts that support a mix of local manufacturing, production, arts, and a sense of place. Urban Industrial would be in areas adjacent to Seattle's designated urban villages. UI would intend to create thoughtful integration between the edges of Seattle's MICs and adjacent neighborhoods. It would seek to improve environmental health, walkability, and comfort in these areas. The UI concept would seek to leverage the industrial aesthetic, including adaptive reuse of buildings. In some alternatives, UI could allow a limited amount of new industry-supportive housing. See **Exhibit 2.4-3**.

Exhibit 2.4-3 Urban Industrial Proposed Land Use Concept



Challenges Addressed

■ Environmental health impacts that affect ■ Strict maximum s

- residents near industrial areas.
- Uncomfortable conditions for pedestrians, cyclists, and transit riders.
- Strong demand for worker housing near jobs.
- Lack of small or affordable space for makers, creatives, and artists.

Features/Development Standards

- Strict maximum size of use limits for stand-alone non-industrial uses.
- Flexibility for larger size of use for retail or office space that is combined with a production or making use on-site.
- A moderate increase in allowed floor area compared to existing industrial zones.
- Development standards such as setbacks and landscaping that are more urban in nature, compared to the existing industrial buffer zones.
- Standards for pedestrian and cyclist-oriented frontage improvements.
- Expanded allowances for limited industry-supportive housing such as caretakers' quarters and maker studios (alternatives 3 and 4 only).

Comprehensive Plan Policy Amendments

The Action Alternatives include new goals and policies relating to the industrial and maritime sectors that would be adopted into the City's Comprehensive Plan. The proposed amendments would establish a new land use framework to implement the concepts discussed above, and new policies concerning transition to clean fuels.

Below is a summary for how the new policies would be integrated into the existing Comprehensive Plan. Specific draft goal and policy language can be found in **Appendix D**.

- Add two new land use **Goals** in the industrial areas section, in addition to existing Land Use Goal 10:
 - Support employment-dense activities and emerging industries that require greater flexibility in the range of on-site uses and activities.
 - Develop transitions between industrial areas and adjacent neighborhoods that support healthy communities, reduce adverse environmental impacts, and minimize land use conflicts.
- Introduce new land use **Policies** that would support implementation of the new goals. Policy amendments would include a new land use framework for the MML, II, and UI zones, establishing their intent and purpose and locational guidance.
- Introduce a new policy to limit changes in MIC boundaries to major updates of the Comprehensive Plan or following a comprehensive city-led study.
- Establish the city's intent to work with owners or future owners of the WOSCA and Interbay Armory sites on a master planning process for future reuse according to the goals and policies for MICs.
- Introduce new or strengthened policies into chapters of the Comprehensive Plan that may include the Transportation, Environment, or Container Port elements encouraging transitions to clean fuels and decarbonization of industrial and maritime activities.

Manufacturing Industrial Center Subarea Plan

The Puget Sound Regional Council's VISION 2050 and the Regional Centers Framework calls for jurisdictions to adopt subarea plans for regional centers. The City of Seattle anticipates developing a subarea plan for the two MICs.

The subarea plans should provide or address:

- A Center Plan Concept/Vision and be the product of Regional Collaboration
- Demonstrate Environmental Protection, Climate Change Adaptation and Mitigation, and Vulnerable Community Protection
- Center Size and Boundaries and Land Use / Development Patterns
 - Industrial Employment Centers should have at least 10,000 existing jobs and plan for at least 20,000 jobs.

- Regional manufacturing/industrial centers must retain a minimum 50% industrial employment.
- The plan should include policies and identify programs that retain at least 75% of industrially zoned land for core industrial uses (e.g., manufacturing, transportation, warehousing, and freight).
- Economy and Market Potential
- Multimodal and Intermodal Transportation
- Public Services
- Innovation, Engagement, and Racial Equity

More information and evaluation is included in **Chapter 3, Section 3.8 Land & Shoreline Use** addressing the relationship of the alternatives to plans and policies.

2.4.2 Regulatory Concepts

Concurrent with implementation of the proposed zones, the City would clarify uses that are "industrial" or "non-industrial". Land uses would still be categorized in specific use categories similar to the existing SMC, but with some consolidation and simplification of terms. Additionally, the City would provide guidance or code language to identify specific use categories that would fall into a broader identification as industrial or non-industrial for the purposes of implementing intended zoning tools.

The development standards in **Exhibit 2.4-4** are general, describe the overall intent of the zone and how it would work to a level of detail sufficient for assessing environmental impacts of the proposal. Specific code language would be drafted at the time of a future legislative proposal. Minor modifications or adjustments are expected and would be similar to the evaluation of alternatives in this EIS.

Exhibit 2.4-4 Development Standards by Land Use Concept

Development Standard	Maritime Manufacturing and Logistics (MML)	Industry and Innovation (II)	Urban Industrial (UI)
Locational Criteria	 Within a M/IC Large parcel sizes Proximate to water and port facilities Proximate to rail or other freight infrastructure Buffered from urban villages and residential zones 	 Within ¼–½ mile walkshed of an existing or planned high capacity transit station Within a MI/C or land previously in an industrial zone outside a MI/C. 	 Within a designated M/IC, or an area with existing industrial/manufacturing/ma ritime uses Proximate to an urban village, or an existing agglomeration of residential uses
Height Limit	None	125–160 feet (with exemptions for industrial equipment, antennas etc.)	Variable with tiers at 45', 60', and 75'

Development Standard	Maritime Manufacturing and Logistics (MML)	Industry and Innovation (II)	Urban Industrial (UI)
Floor Area Ratio (FAR) The FAR limit is for all uses in total in a development (whether office, manufacturing etc.)	2.5 Maximum FAR total. 0.4 Maximum for non-industrial uses.	Base and Bonus Limits: Development of floor area up to the base amount must be built and dedicated for industrial uses. Development exceeding the base is allowed through a ratio whereby 3 square feet of non-industrial use space may be built for each additional square foot of dedicated industrial space that is built. There is a total Maximum FAR limit on all development. Mixed Development with Bonus: 3 sq. ft. of bonus floor area for non-industrial space for each 1 sq. ft. of industrial space above a base FAR 0.5 of industrial development. Total maximum FAR Limit: 4-6 (depends on location) Industrial-only development: Development that only include industrial uses with no bonus development have a max FAR of 2.5. Configuration: Industrial development must be in the same building (i.e., first two floors), or in a separate building on the same site as bonus development. A close-to-maximum development would be about 1/3 industrial, and 2/3 non-industrial.	3.0 for 45' heights; 4.0 for 60' heights, and 4.5 for 75' height
Permitted Principal Uses The list is a general summary to describe the overall intent and is not exhaustive.	Industrial Uses Permitted outright with no maximum size of use limits or additional restrictions. A broad range of heavy and light Manufacturing uses. A broad range of warehousing / distribution, marine and logistics Transportation uses A broad range of Utility uses Outdoor Storage and Warehouse Uses (but mini-	Industrial Uses—Base Same permitted as for the MML zone. Non-Industrial Uses—Bonus Only allowed as bonus development. (2–3 sq. ft. allowed per each additional sq. ft. of industrial use space above the base FAR of 0.5 of industrial use space.)	Industrial Uses—Base Permitted outright with no maximum size of use limits or additional restrictions, but the heaviest / most impactful industrial uses are not allowed. Light Manufacturing uses. Warehousing / distribution, marine and logistics Transportation uses Some lower-impact utility uses

Development Standard	Maritime Manufacturing and Logistics (MML)	Industry and Innovation (II)	Urban Industrial (UI)
Scaracia	Storage Warehouses are prohibited) Laboratory, and research and development with physical processes Food processing and craft work Automotive uses Non-Industrial Uses Permitted as a principal use only when subject to strict maximum size of use limits and FAR sub-limit. Commercial sales and services Office Institutional Uses Lodging Entertainment Uses (#)		Outdoor Storage and Warehouse Uses (but mini- Storage Warehouses are prohibited) Laboratory, and research and development with physical processes Food processing and craft work Automotive uses Non-Industrial Uses Permitted subject to strict maximum size of use limits. (Note—greater flexibility for ancillary uses below). Commercial sales and services Office Institutional Uses Entertainment Uses (1)
Prohibited Uses This is not a comprehensive list.	Mini storage Principal use parking	Mini storage Principal use parking	Mini storage Principal use parking Heavy manufacturing Some intensive utility uses Some intensive transportation uses
Ancillary Uses Ancillary uses are functions associated with or related to the principal permitted use. Rules concerning ancillary uses would be clarified.	Non-Industrial activities that are ancillary to an Industrial Use are limited to 30% of the floor area or activity area of the use.	Non-Industrial activities that are ancillary to an Industrial Use are limited to 30% of the floor area or activity area of the use, or else the use would be classified as Non-Industrial / Bonus development.	Non-Industrial activities that are ancillary to an Industrial Use may occupy up to 80% of the floor area, with 20% of floor area in the industrial use. The intent is to allow large spaces for activities such as tasting rooms, retail and office when associated with a bonafide on-site or nearby industrial use.
Maximum Size of Use Limits Limits pressure from non-industrial uses, and provides services intended to support workforce in the same building or general area as a principally	10,000 sq. ft. Major durables sales, service Office Lodging (#) Medical services Entertainment (#) 7,500 sq. ft. General retail sales and service 3,000 sq. ft.	None. Principal non-industrial uses are allowed without a size limit, subject to the incentive bonus system.	Maximum size of use limits are for stand-alone principal non-industrial uses. Note increased flexibility for ancillary uses, which could allow larger-sized spaces if combined with an industrial use. 25,000 sq. ft. Lodging Medical services

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Development Standard	Maritime Manufacturing and Logistics (MML)	Industry and Innovation (II)	Urban Industrial (UI)
allowed industrial uses.	Restaurants / Bars		Entertainment 15,000 sq. ft. Major durables sales, service Office 7,500 sq. ft. General retail sales and service 3,000 sq. ft. Restaurants / Bars
Residential Uses	No change to existing, narrow allowances for caretakers' quarters (1 per business); and artist/studio housing (existing structures only, 800 sq. ft. max.)	No change to existing, narrow allowances for caretakers' quarters (1 per business); and artist/studio housing (existing structures only, 800 sq. ft. max.)	Alternatives 3: increased allowance for industry supportive housing: Up to 2 caretakers'/workers' quarters per on-site industrial business. Artist/studio/maker housing allowed in new buildings, no max. unit size. Maximum density of 25 dwelling units / acre. Residential may not exceed 40% total floor area. Alternatives 4: increased allowance for industry supportive housing: Up to 3 caretakers'/workers' quarters per on-site industrial business. Artist/studio/maker housing allowed in new buildings, no max. unit size. Maximum density of 50 dwelling units / acre. Residential may not exceed 60% total floor area. Additional conditions apply. (See Housing and Land & Shoreline Use sections).
Parking Requirements	No Minimum Parking	No minimum parking Maximum parking: 1 per 1,000 sq. ft. (Parking maximum is provided to minimize SOV trips. Other Transportation Demand Management requirements may be explored to minimize SOV trips.)	No minimum

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Development Standard	Maritime Manufacturing and Logistics (MML)	Industry and Innovation (II)	Urban Industrial (UI)
Setbacks			If abutting a residential zone 10' ground level setback from abutting property line. If abutting a residential zone, an additional 5' upper-level setbacks at 30' of building height, and an additional 5' building setback for each additional 10' of building height above 30'.
Frontage and Landscaping and Design Requirements	Street improvements No design review required	Multi-modal frontage improvements (sidewalks, pedestrian lighting, street trees etc.) No design review required	Multi-modal frontage improvements (sidewalks, pedestrian lighting, street trees etc.) Green Factor of 0.2 required No design review required
Indoor Sports and Recreation (An entertainment use)	Alt. 4 only Increase max 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.	Alt. 4 only Increase max 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.	Alt. 4 only Increase max 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.
Stadium Transition Area Overlay District STAOD would be retained, and unique allowances and requirements would modify the underlying UI zone in that area in action alts. Including changes from existing STAOD standards.	Not Applicable	Not Applicable	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.
Non-Conforming Uses and Structures		Existing single use non- industrial structures such as offices rezoned into the II zone shall be considered an allowed use and not classified as non-conforming	

2.4.3 Alternative 1—No Action

The No Action Alternative is required by SEPA. No change to current Comprehensive Plan policies, development standards, or zoning maps are included under this alternative. The existing zone classifications established in 1986—the Industrial General (IG1 and IG2) zones, the Industrial Commercial (IC) zone, and the Industrial Buffer (IB) zone—would remain. IG is the core industrial zone that prioritizes industrial and maritime uses and covers most of the MICs. IC allows for a mix of industrial and commercial activities, but in recent years has been developed primarily with office and commercial uses. IB offers development standards intended to buffer industrial uses from adjacent neighborhoods and includes a focus on setbacks, limited heights, and landscaping. See **Exhibit 2.4-6**.

The No Action Alternative retains the following:

- No change to IG zones that cover 90% of industrially zoned areas.
- No change to IC zone that cover 5% of industrially zoned areas.
- No change to IB zone that cover 5% of industrially zoned areas.
- Residential uses are prohibited with the exception of one caretaker quarters per industrial business, artist studio housing in existing structures, and housing that predates industrial zoning.

See **Exhibit 2.4-5** with acres and percent of zones.

Exhibit 2.4-5 Alternative 1—No Action Zoning Districts (Acres)

Zoning Districts	Acres	Share
Industrial General (IG1/IG2)	6,273	90.4%
Industrial Buffer (IB)	316	4.6%
Industrial Commercial (IC)	347	5%
Total	6,936	100%

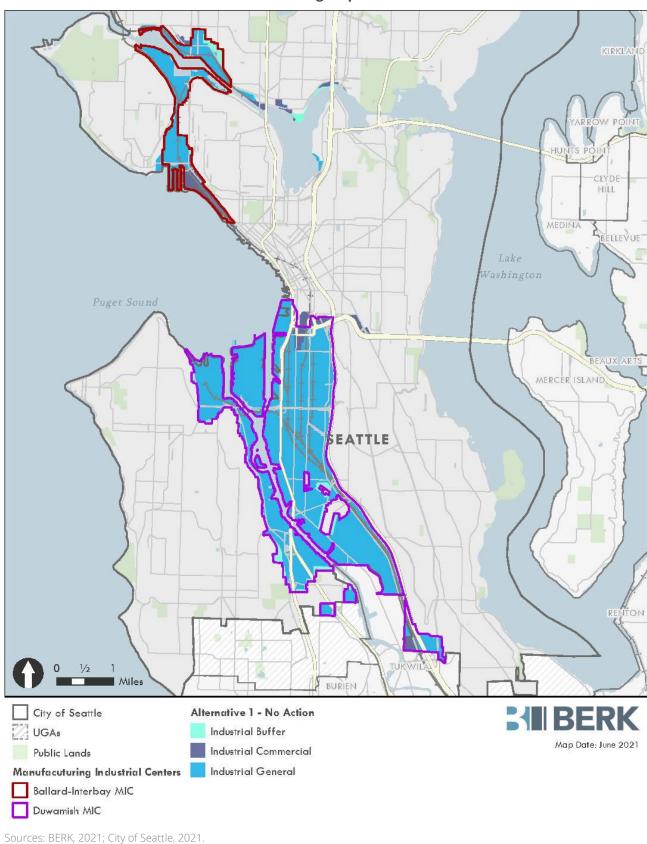


Exhibit 2.4-6 Alternative 1—No Action Zoning Map

The City of Seattle will be planning for total citywide job growth of 169,500 jobs over the 20-year planning horizon. Employment growth of 23,500 projected under Alternative 1 in the study area would represent about 14% of total citywide job growth. The study area contains the MICs and additional industrial zoned areas outside of MICs. The 14% share of total citywide job growth under Alternative 1 is an increase to the share of job growth planned for industrial areas during the previous Seattle 2035 20-year planning horizon, which estimated 8% of the city's job growth in MICs (and not including industrial zoned lands outside of MICs).

Current jobs are majority industrial (55%). The total number of jobs is expected to increase by 23,500 with just over half of that industrial. When added to base jobs, the share of industrial jobs in 2044 would slightly decrease (54%). The current number of dwellings is small and is only projected to increase by 75 units, assumed to be caretakers' units and artist/studio quarters. See **Exhibit 2.4-7**.

Exhibit 2.4-7 Alternative 1—No Action Jobs and Housing Units, Existing and 2044

	Existing	2044
Industrial Jobs	54,500*	66,400
Commercial Jobs	44,400*	55,600
Residential Dwellings	413**	488

Notes: *2018, ** 2021

Sources: CAI, 2021; City of Seattle, 2021.

Under Alternative 1—No Action, most industrial jobs as well as total jobs are located in the SODO/Stadium and Georgetown/South Park subareas, with less in the Ballard, Interbay Dravus, and Interbay Smith-Cove subareas. See **Exhibit 2.4-8**.

Exhibit 2.4-8 Current and Alternative 1—No Action Employment Mix by Subarea

	Current	Current Conditions (2018)		Alternative 1 No Action— Existing Policies (2044)		
Subarea	Industrial Emp	Total Emp	Percent Industrial	Industrial Emp	Total Emp	Percent Industrial
Ballard	9,400	17,100	55.0%	11,600	22,300	52.0%
Interbay Dravus	3,400	5,600	60.7%	3,900	6,800	57.4%
Interbay Smith Cove	3,900	6,000	65.0%	4,700	7,400	63.5%
SODO/Stadium	23,000	43,900	52.4%	28,200	53,500	52.7%
Georgetown/South Park	14,900	25,900	57.5%	18,000	32,000	56.3%
Total	54,500	98,500	55.3%	66,400	122,000	54.4%

Sources: CAI, 2021; City of Seattle, 2021.

Under Alternative 1 No Action, the expected increment in caretakers' quarters is proportional to the percent increase in employment growth, and there would be an estimated average annual growth rate of 3 artist/studio workspace conversions per year. The number of new units is expected to be 75. See **Exhibit 2.4-9**.

Exhibit 2.4-9 Current and Alternative 1—No Action Housing Units in Industrial Zones

Subarea	Existing (2021)	No Action Total (2044)	No Action Growth (2018-2044)
Ballard	192	200	8
Interbay Dravus	3	11	8
Interbay Smith Cove	1	9	8
SODO/Stadium	21	51	30
Georgetown/South Park	196	219	23
Total	413	488	75

Source: City of Seattle, 2021.

Over two thirds of the increase in jobs (67%) is anticipated to be in the Greater Duwamish MIC and one third in the BINMIC. The increase in population assumes the 2020 citywide household size of 2.05,² and is about 154 persons. See **Exhibit 2.4-10**.

Exhibit 2.4-10 Alternative 1—No Action Jobs and Population Growth by Subarea

Study Area	Job Increase 2018-2044	Population Increase 2021-2044
Ballard	5,200	15
Interbay Dravus	1,200	15
Interbay Smith Cove	1,400	15
SODO/Stadium	9,600	62
Georgetown/South Park	6,100	46
Total	23,500	154

Sources: CAI, 2021; City of Seattle, 2021.

² See 2020 US Census data: https://www.seattle.gov/opcd/population-and-demographics/about-seattle#population. The 2019 household size for the zip code including the Ballard Subarea is 1.96 and for the Georgetown/South Park Subarea is 2.76, or 2.35 average between them. Since it is expected that caretakers' quarters and live/work units may have smaller household sizes the citywide household size is used.

2.4.4 Alternative 2—Future of Industry Limited

Alternative 2—Future of Industry Limited applies the proposed land use concepts with relatively less Industry and Innovation and Urban Industrial than the other two Action Alternatives. See **Exhibit 2.4-12**.

Alternative 2 proposes the following:

- Updates industrial land use policies to anticipate future innovations and trends.
- Strengthens protections for industrial uses in MML zone covering 90% of industrial lands.
- Applies a mix of II and UI zone concepts in 10% of current MIC areas, including an estimated
 1/4 mile from light rail stations.
- No expansion of housing allowances.
- Does not remove any land from MICs.

See zoning district acres in **Exhibit 2.4-11**.

Exhibit 2.4-11 Alternative 2—Future of Industry Limited Zoning Districts (Acres)

Zoning Districts	Acres	Share
Maritime, Manufacturing, and Logistics (MML)	6,251	90.1%
Urban Industrial (UI)	222	3.2%
Industry and Innovation (II)	463	6.7%
Total	6,936	100%

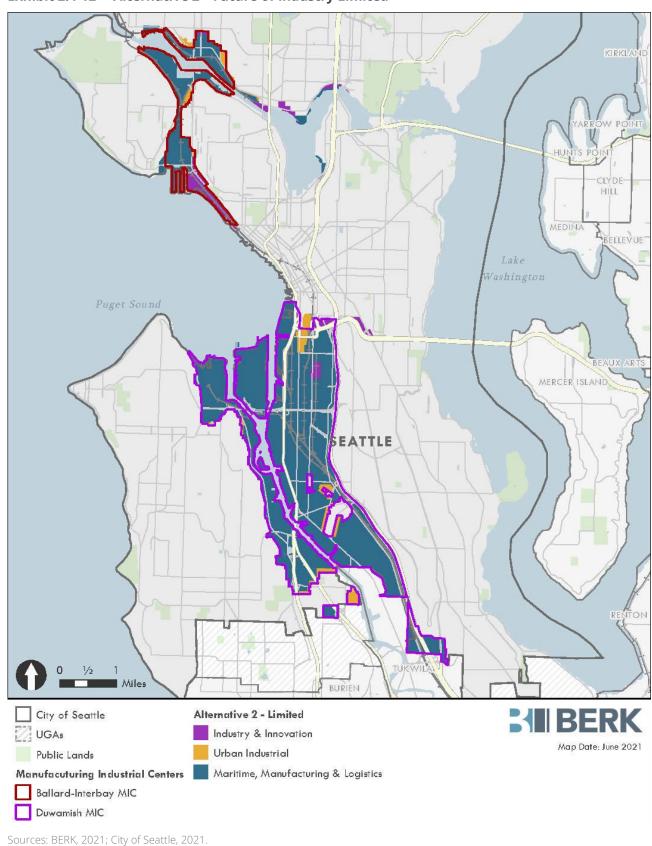


Exhibit 2.4-12 Alternative 2—Future of Industry Limited

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. Employment growth of 34,400 projected under Alternative 2 in the study area would represent about 20% of total citywide job growth that the City would be planning for during the 20-year planning horizon. This would represent a shift of a moderately greater share of the city's expected employment growth into industrial areas compared to past trends and the previous 20-year Comprehensive Plan planning horizon.

The number of dwellings is projected to increase by 80 units and assumed to be caretakers' quarters and some artist/studios. See **Exhibit 2.4-13**.

Exhibit 2.4-13 Alternative 2 Jobs and Housing Units, Existing and 2044

	Existing	2044
Industrial Jobs	54,500*	79,400
Commercial Jobs	44,000*	53,500
Residential Dwellings	413**	493

Notes: *2018, ** 2021

Sources: CAI, 2021; City of Seattle, 2021.

Most industrial jobs and total jobs are located in the SODO/Stadium and Georgetown/South Park subareas and would continue to have the greatest growth (67%). See **Exhibit 2.4-14**.

Exhibit 2.4-14 Current and Alternative 2 Employment Mix by Subarea

	Current Conditions (2018)			Alternative 2 Future of Industry— Limited (2044)		
Subarea	Industrial Emp	Total Emp	Percent Industrial	Industrial Emp	Total Emp	Percent Industrial
Ballard	9,400	17,100	55.0%	13,600	23,600	57.6%
Interbay Dravus	3,400	5,600	60.7%	4,900	7,700	63.6%
Interbay Smith Cove	3,900	6,000	65.0%	5,800	8,600	67.4%
SODO/Stadium	23,000	43,900	52.4%	33,700	57,700	58.4%
Georgetown/South Park	14,900	25,900	57.5%	21,400	35,300	60.6%
Total	54,500	98,500	55.3%	79,400	132,900	59.7%

Sources: CAI, 2021; City of Seattle, 2021.

Under Alternative 2, the expected increment in caretakers' quarters is proportional to the percent increase in employment growth, and there would be an estimated average annual

growth rate of 3 artist/studio workspace conversions per year. With these assumptions the number of units is expected to be 80. See **Exhibit 2.4-15**.

Exhibit 2.4-15 Current and Alternative 2 Housing Units in Industrial Zones

Subarea	Existing	Alternative 2 Total (2044)	Alternative 2 Growth
Ballard	192	200	8
Interbay Dravus	3	11	8
Interbay Smith Cove	1	9	8
SODO/Stadium	21	53	32
Georgetown/South Park	196	220	24
Total	413	493	80

Source: City of Seattle, 2021.

Two thirds of the increase in jobs is anticipated to be in the Greater Duwamish MIC and one third in the BINMIC. The increase in population assumes the 2020 citywide household size of 2.05,³ and is about 164 persons. See **Exhibit 2.4-16**.

Exhibit 2.4-16 Alternative 2 Jobs and Population Growth by Subarea

Subarea	Job Increase 2018-2044	Population Increase 2021-2044
Ballard	6,500	16
Interbay Dravus	2,100	16
Interbay Smith Cove	2,600	16
SODO/Stadium	13,800	66
Georgetown/South Park	9,400	49
Total	34,400	164

Sources: CAI, 2021; City of Seattle, 2021.

³ See 2020 US Census data: https://www.seattle.gov/opcd/population-and-demographics/about-seattle#population. The 2019 household size for the zip code including the Ballard Subarea is 1.96 and for the Georgetown/South Park Subarea is 2.76, or 2.35 average between them. Since it is expected that caretakers' quarters and live/work units may have smaller household sizes the citywide household size is used.

2.4.5 Alternative 3—Future of Industry Targeted

Alternative 3—Future of Industry Targeted applies the proposed land use concepts with a greater share of Industry and Innovation and Urban Industrial than Alternative 2. See **Exhibit 2.4-18**.

Alternative 3 proposes the following:

- Updates industrial land use policies to anticipate future innovations and trends.
- Strengthens protections for industrial uses in MML zones covering 86% of industrial lands.
- Applies a mix of II and UI zone concepts in 14% of current MIC areas, including an estimated
 1/2 mile from light rail stations.
- Expansion of limited industry-supportive housing in UI zone concept.
- Removes focused land in Georgetown/South Park from MICs.

Acres by zoning are shown in **Exhibit 2.4-17**.

Exhibit 2.4-17 Alternative 3—Future of Industry Targeted Zoning Districts (Acres)

Zoning Districts	Acres	Share
Maritime, Manufacturing, and Logistics (MML)	5,968.00	86.0%
Urban Industrial (UI)	426	6.1%
Industry and Innovation (II)	516	7.4%
Mixed-Use Commercial	26	0.4%
Total	6,936	100%

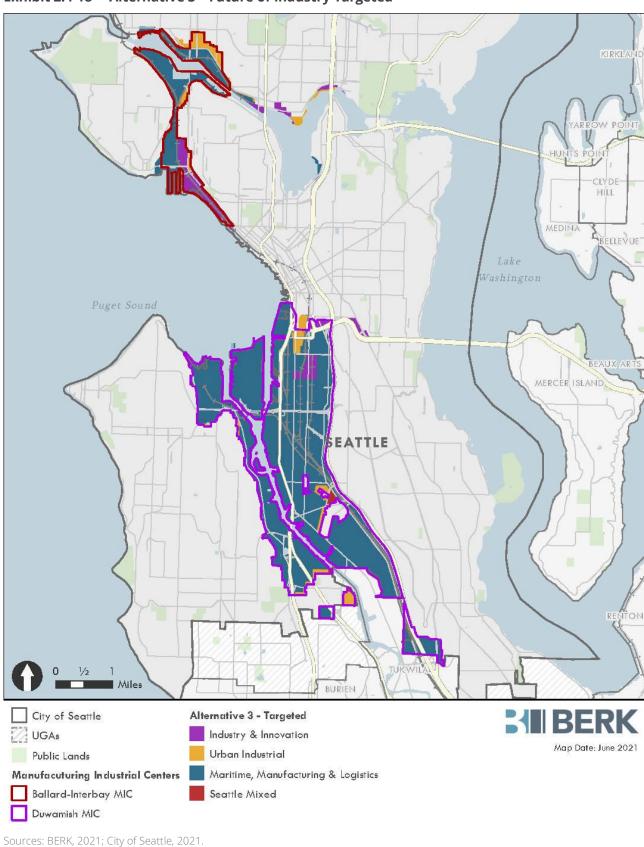


Exhibit 2.4-18 Alternative 3—Future of Industry Targeted

The total number of jobs would increase by 57,400 with 60% of those industrial jobs; the total share of industrial jobs in 2044 would slightly decrease from 55% in 2018 to 54% in 2044. This level of employment growth would shift a sizeable share of Seattle's total employment growth into MICs compared to historic growth rates in MICs. Employment growth of 57,400 projected under Alternative 3 in the study area would represent about 34% of total citywide job growth that the city is planning for during the 20-year planning horizon. This would represent a substantial shift of the total share of the city's expected employment growth into MICs and industrial areas compared to past trends and the previous 20-year Comprehensive Plan planning horizon.

The number of dwellings is projected to increase by 610 units, with a combination of caretakers' quarters and makers studios under modified allowances for industry-supportive housing in the UI zone. See **Exhibit 2.4-19**.

Exhibit 2.4-19 Alternative 3 Jobs and Housing Units, Existing and 2044

	Existing	2044
Industrial Jobs	54,400*	83,500
Commercial Jobs	44,000*	72,400
Residential Dwellings (Industrial zones)	4474	610
Residential Dwellings (new mixed-use commercial zones)	413**	1,491

Notes: *2018, ** 2021

Sources: CAI, 2021; City of Seattle, 2021.

As with today's conditions, most industrial jobs and total jobs are located in the SODO/Stadium and Georgetown/South Park subareas and would continue to have the greatest growth. See **Exhibit 2.4-20**.

Exhibit 2.4-20 Current and Alternative 3 Employment Mix by Subarea

	Current Conditions (2018)			Alternative 3 Future of Industry— Targeted (2044)		
Subarea	Industrial Emp	Total Emp	Percent Industrial	Industrial Emp	Total Emp	Percent Industrial
Ballard	9,400	17,100	55.0%	15,900	31,100	51.1%
Interbay Dravus	3,400	5,600	60.7%	5,500	9,900	55.6%
Interbay Smith Cove	3,900	6,000	65.0%	6,300	10,500	60.0%
SODO/Stadium	23,000	43,900	52.4%	34,700	66,000	52.6%
Georgetown/South Park	14,900	25,900	57.5%	21,100	38,400	54.9%
Total	54,500	98,500	55.3%	83,500	155,900	53.6%

Under Alternative 3, there would be greater allowance for housing in the UI zone. Focused land in Georgetown/South Park would be removed from MICs and could be developed for housing. With these collective changes, the number of dwellings in industrial zones would increase to about 610. Most of the housing in industrial zones would be in Ballard and the SODO/Stadium subareas. See **Exhibit 2.4-21**.

Exhibit 2.4-21 Current and Alternative 3 Housing in Industrial Zones

Subarea	Existing (2021)	Alternative 3 Total (2044)	Alternative 3 Growth
Ballard	192	452	260
Interbay Dravus	3	78	75
Interbay Smith Cove	1	16	15
SODO/Stadium	21	221	200
Georgetown/South Park (industrial zones)	196	256	60
Total	413	1,023	610

Source: City of Seattle, 2021.

In addition to the housing in industrial zones, some more new housing would result in focused areas in Georgetown and South Park that would be removed from the MIC and placed in a mixed-use zone. In Alternative 3, a total of 784 dwelling units in mixed-use developments are estimated for the triangular area of Georgetown bounded by Airport Way, Corson Avenue S, and Carleton Avenue S, and 294 dwelling units are estimated for the two small areas of South Park that would be removed from the MIC near the Duwamish River. This would result in a total of 1,078 housing units over the study time horizon on land that is removed from industrial zoning under Alternative 3.

About 60% of the increase in jobs is anticipated to be in the Greater Duwamish MIC and one 40% in the BINMIC. The increase in population assumes the 2020 citywide household size of 2.05⁴, and is about 1,251 persons. See **Exhibit 2.4-22**. The areas removed from the MIC would be zoned for mixed-uses and have capacity for about 2,210 people beyond the population in the industrial zones addressed in **Exhibit 2.4-21**.

Within the study area the collective change in population including within industrial areas and the MIC reduction areas would equal 3,460 persons.

⁴ See 2020 US Census data: https://www.seattle.gov/opcd/population-and-demographics/about-seattle#population. The 2019 household size for the zip code including the Ballard Subarea is 1.96 and for the Georgetown/South Park Subarea is 2.76, or 2.35 average between them. Since it is expected that caretakers' quarters and live/work units may have smaller household sizes the citywide household size is used.

Exhibit 2.4-22 Alternative 3 Jobs and Population Growth by Subarea

Subarea	Job Increase 2018-2044	Population Increase 2021-2044
Ballard	14,000	533
Interbay Dravus	4,300	154
Interbay Smith Cove	4,500	31
SODO/Stadium	22,100	410
Georgetown/South Park	12,500	123
Total	57,400	1,251

2.4.6 Alternative 4—Future of Industry Expanded

Alternative 4—Future of Industry Expanded applies the proposed land use concepts with a greater share of Industry and Innovation and Urban Industrial than Alternative 2. This alternative expands limited housing allowances compared to Alternative 3. See **Exhibit 2.4-24**.

Alternative 4 proposes the following:

- Updates industrial land use policies to anticipate future innovations and trends.
- Strengthens protections for industrial uses in maritime, manufacturing and logistics zones covering 87% of industrial lands.
- Applies a mix of II and UI zone concepts in 13% of current MIC areas, including an estimated
 1/2 mile from light rail stations.
- Expansion of limited industry-supportive housing in UI zone concept.
- Removes focused land in Georgetown/South Park from the MIC.
- Increases maximum size of use limit for indoor sports and recreation uses.

The zoning districts by acres is listed in **Exhibit 2.4-23**.

Exhibit 2.4-23 Alternative 4—Future of Industry Expanded Zoning Districts (Acres)

Zoning Districts	Acres	Share
Maritime, Manufacturing, and Logistics (MML)	6,035	87.0%
Urban Industrial (UI)	279	4.0%
Industry and Innovation (II)	600	8.7%
Mixed-Use Commercial	22	0.3%
Total	6,936	100%

Source: City of Seattle, 2021.

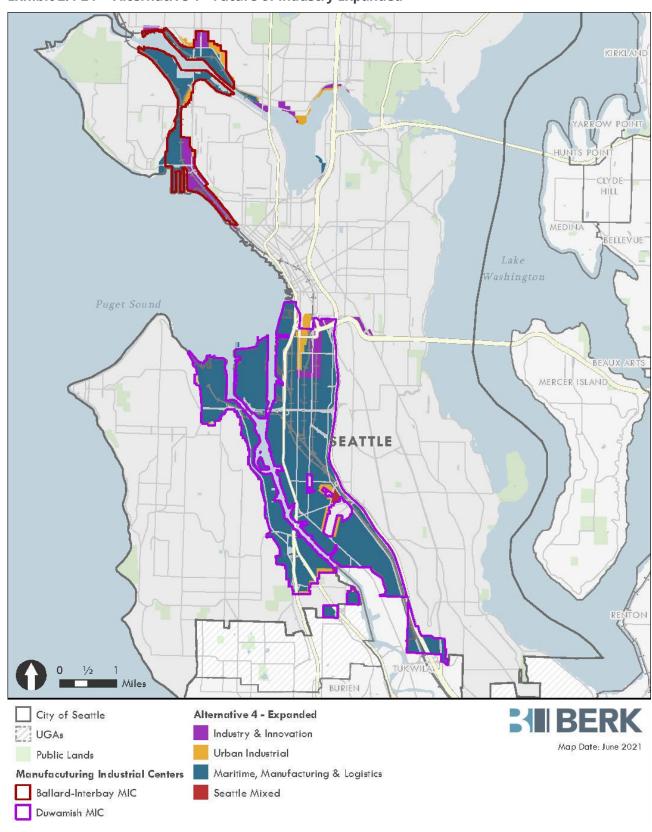


Exhibit 2.4-24 Alternative 4—Future of Industry Expanded

The total number of jobs would increase by 59,200 with 49% of those industrial jobs; the total share of industrial jobs in 2044 would slightly decrease from 55% in 2018 to 53% in 2044. Like Alternative 3, this level of employment growth would shift a sizeable share of Seattle's total employment growth into MICs compared to historic growth rates in MICs. Employment growth of 59,500 projected under Alternative 4 in the study area would represent about 35% of total citywide job growth that the city would be planning for during the 20-year planning horizon. Similar to Alternative 3, this would represent a substantial shift of the total share of the city's expected employment growth into MICs and industrial areas compared to past trends and the previous 20-year Comprehensive Plan planning horizon.

The number of dwellings is projected to increase by 2,195 units, with a combination of caretakers' quarters and makers studios under modified allowances for industry-supportive housing in the UI zone. See **Exhibit 2.4-25**.

Exhibit 2.4-25 Alternative 4 Jobs and Housing Units, Existing and 2044

	Existing	2044
Industrial Jobs	54,400*	83,300
Commercial Jobs	44,000*	74,400
Residential Dwellings (industrial zones)	413**	2,195
Residential Dwellings (new commercial mixed-use zones)		1,491

Notes: *2018, ** 2021

Sources: CAI, 2021; City of Seattle, 2021.

Most industrial jobs and total jobs (59%) are located in the SODO/Stadium and Georgetown/South Park subareas and would continue to have the greatest total growth. Relative to other alternatives, Alternative 4 places more jobs in Ballard and Interbay subareas. See **Exhibit 2.4-26**.

Exhibit 2.4-26 Current and Alternative 4 Employment Mix by Subarea

	Current	t Condition	s (2018)		4 Future o panded (20	f Industry— 44)
Subarea	Industrial Emp	Total Emp	Percent Industrial	Industrial Emp	Total Emp	Percent Industrial
Ballard	9,400	17,100	55.0%	16,000	32,000	50.0%
Interbay Dravus	3,400	5,600	60.7%	5,600	10,200	54.9%
Interbay Smith Cove	3,900	6,000	65.0%	6,300	10,700	58.9%
SODO/Stadium	23,000	43,900	52.4%	34,400	66,300	51.9%
Georgetown/South Park	14,900	25,900	57.5%	21,000	38,500	54.5%

	Current	Current Conditions (2018)			Alternative 4 Future of Industry— Expanded (2044)		
Subarea	Industrial Emp	Total Emp	Percent Industrial	Industrial Emp	Total Emp	Percent Industrial	
Total	54,500	98,500	55.3%	83,300	157,700	52.8%	

Under Alternative 4, there would be greater allowance for housing in the UI zone. As a result, residential dwelling units in industrial zones would increase to about 2,195. Most would be in Ballard and the SODO/Stadium subareas. See **Exhibit 2.4-27**.

Exhibit 2.4-27 Current and Alternative 4 Housing Units in Industrial Zones

Subarea	Existing (2021)	Alternative 4 Total (2044)	Alternative 4 Growth
Ballard	192	982	790
Interbay Dravus	3	178	175
Interbay Smith Cove	1	1	0
SODO/Stadium	21	1011	990
Georgetown/South Park	196	436	240
Total	413	2,608	2,195

Source: City of Seattle, 2021.

In addition to the housing in industrial zones, some more new housing would result in focused areas in Georgetown and South Park that would be removed from the MIC and placed in a mixed-use zone. These quantities are the same in Alternative 4 as in Alternative 3: 784 dwelling units in the triangular area of Georgetown bounded by Airport Way, Corson Avenue S, and Carleton Avenue S, and 294 dwelling units in the two small areas of South Park near the Duwamish River, for a total of 1,078 housing units during the study time horizon. This would potentially add another 2,210 in population beyond the added population in the industrial zones addressed in **Exhibit 2.4-27**.

About 59% of the increase in jobs is anticipated to be in the Greater Duwamish MIC and 41% in the BINMIC; more jobs are in the Ballard Subarea than the Georgetown/South Park Subarea. The increase in population assumes the 2020 citywide household size of 2.05,⁵ and is about

⁵ See 2020 US Census data: https://www.seattle.gov/opcd/population-and-demographics/about-seattle#population. The 2019 household size for the zip code including the Ballard Subarea is 1.96 and for the Georgetown/South Park Subarea is 2.76, or 2.35 average between them. Since it is expected that caretakers' quarters and live/work units may have smaller household sizes the citywide household size is used.

4,500 persons. See **Exhibit 2.4-28**. Within the study area the collective change in population including within industrial areas and the MIC reduction areas would equal 6,710 persons.

Exhibit 2.4-28 Alternative 4 Jobs and Population Growth by Subarea

Subarea	Job Increase 2018-2044	Population Increase 2021-2044
Ballard	14,900	1,620
Interbay Dravus	4,600	359
Interbay Smith Cove	4,700	_
SODO/Stadium	22,400	2,030
Georgetown/South Park	12,600	492
Total	59,200	4,500

Sources: CAI, 2021; City of Seattle, 2021.

2.4.7 Summary of Alternatives

Exhibit 2.4-29 below summarizes the land use concepts under each of the four alternatives studied in this EIS. It is important to keep in mind that these are not zoning proposals when reviewing the alternatives. A legislative proposal will be developed once the EIS process is complete which will likely be a hybrid of the alternatives described below and may include refinements to detailed aspects of the development standards.

Exhibit 2.4-29 Summary of Land Use Concepts by Alternatives

No Action Alternative	New Land Use Concepts	Alt 2—Future of Industry Limited	Alt 3—Future of Industry Targeted	Alt 4—Future of Industry Expanded
Industrial General Zones: 90% of land area	Maritime Manufacturing and Logistics (MML) Zone	90% with stronger protections.	86% with stronger protections.	87% with stronger protections.
Industrial Commercial Zones: 5% of land area	Industry and Innovation (II) Zone	7% of land area. Located up to approximately ¼ mile around transit stations and all land currently zoned industrial commercial.	7% of land area. Located approximately up to ½ mile around transit stations and all land currently zoned Industrial Commercial.	9% of land area. Located greater than ½ mile around transit stations and all land currently zoned Industrial Commercial. Includes land near potential Ballard ST3 station and the Stadium ST3 station.
Industrial Buffer Zone: 5% of land area	Urban Industrial (UI) Zone	3% of land area. Located generally in transition areas between MML or II	6% of all land area. Expanded transition area in Ballard.	4% of land area. Expanded transition area in Stadium district.

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No Action Alternative	New Land Use Concepts	Alt 2—Future of Industry Limited	Alt 3—Future of Industry Targeted	Alt 4—Future of Industry Expanded
		zones and nonindustrial areas.		
Areas removed from MIC and placed in mixed-use zone		None.	Small nodes in Georgetown/South Park to advance community goals	Small nodes in Georgetown/South Park to advance community goals
Only new caretaker's quarters, artist housing and existing non-conforming: approx. 413 units	Housing in Industrial Zones	No expanded allowances.	Expanded industry- supportive in UI zones: approx. 610 units.	Larger expansion of Industry-supportive in UI zones: approx. 2,195 units.
Lodging Prohibited	Stadium Overlay	No change.	Allow lodging.	All lodging with larger size of use limits.
Size of Use Limits	Non-Industrial uses.	Expanded non- industrial ancillary uses. Reduced stand- alone non-industrial size of use limits.	Expanded non- industrial ancillary uses. Reduced stand- alone non-industrial size of use limits.	Expanded non-industrial ancillary uses. Reduced stand-alone non-industrial size of use limits. Expanded size of use limit for indoor recreational facilities.
MIC Subarea Plans	Current Plans	Update MIC Subarea Plans per VISION 2050	Update MIC Subarea Plans per VISION 2050	Update MIC Subarea Plans per VISION 2050
Comprehensive Plan Policies	Current Policies	Amend Comprehensive Plan Policies to establish new land use framework, limit MIC boundary changes to Periodic Update, establish City's intent to work with State of Washington on a masterplan for the Armory and WOSCA Sites.	Amend Comprehensive Plan Policies to establish new land use framework, limit MIC boundary changes to Periodic Update, establish City's intent to work with State of Washington on a masterplan for the Armory and WOSCA Sites.	Amend Comprehensive Plan Policies to establish new land use framework, limit MIC boundary changes to Periodic Update, establish City's intent to work with State of Washington on a masterplan for the Armory and WOSCA Sites.

Sources: BERK, 2021; City of Seattle, 2021.

A comparison of zoned acres is listed below. In all alternatives, the majority of the study area would be dedicated for industrial and manufacturing uses (IG or MML). Some areas zoned for industrial and manufacturing uses today would be designated instead for transitional zoning (UI) or dense employment (II) under the Action Alternatives. See **Exhibit 2.4-30**.

Exhibit 2.4-30 Comparison of Alternatives by Land Use/Zoning Acres

Zoning Districts	Alt 1	Land Use Concept	Alt 2	Alt 3	Alt 4
Industrial General (IG1/IG2)	6,273	Maritime, Manufacturing, and Logistics (MML)	6,251	5,968	6,035
Industrial Buffer (IB)	316	Urban Industrial	222	426	279
Industrial Commercial (IC)	347	Industry and Innovation	463	516	600
Mixed-Use Commercial				26	22
Total	6,936		6,936	6,936	6,936

Sources: City of Seattle, 2021; BERK, 2021.

Exhibit 2.4-31 summarizes total projected employment growth in the study area for the base year and by alternative, with a breakout of industrial⁶ and non-industrial employment. The No Action Alternative and all three of the Action Alternatives result in employment growth. Overall employment growth is strongest under alternatives 3 and 4, which would result in 58% and 60% employment growth from the base year of 2018 over the time horizon to 2044. This would be substantially more job growth in Seattle's MICs than has occurred in the last 20-year period due to the proposed changes. The overall number of industrial jobs would grow in all of the alternatives—ranging from +11,900 under No Action to +28,800 under Alternative 4. The percentage of the jobs that are industrial however would decrease incrementally from 55% in the base year to 53% under Alternative 4. See **Exhibit 2.4-32**.

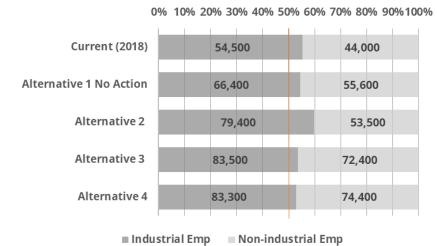
⁶ Industrial employment estimated based on the 2019 share of industrial employment by sector based on the 2015 PSRC Industrial Lands Study NAICs-based definition of industrial activities. This uses classification of what counts as an industrial job consistent with Puget Sound Regional Council criteria, including jobs in Information Computer Technology (ICT). Projections show strong job growth in ICT under the Action Alternatives. Consistency with PSRC classifications is appropriate given the need to fit VISION 2050 and Regional Centers Framework. A more conservative classification of which jobs are industrial, especially in ICT would show a steeper decline in the % of industrial jobs under most studied alternatives.

180000 160000 140000 120000 74400 100000 80000 44000 60000 40000 20000 0 Alt. 1 (2044) Alt. 4 (2044) Baseline (2018) Alt. 3 (2044) Alt. 2. (2044) ■ Industrial ■ Non-industrial

Exhibit 2.4-31 Industrial and Non-Industrial Job Share

Source: City of Seattle, 2021.

Exhibit 2.4-32 Share of Industrial and Non-Industrial Jobs



Sources: City of Seattle, 2021; BERK, 2021.

Exhibit 2.4-33 shows percentage of employment growth by subarea to display which subareas would have relatively greater employment growth over the base amount. The north subareas of Ballard, Interbay Dravus, and Interbay Smith Cove would have the highest employment growth on a percentage basis, most notably under alternative 3 and 4 where employment growth is projected to increase by over 70% for each of these three northern areas.

While the greatest percent change in jobs is in the northern BINMIC subareas, the number of new jobs is greater in the Greater Duwamish MIC southern subareas. See **Exhibit 2.4-34**.

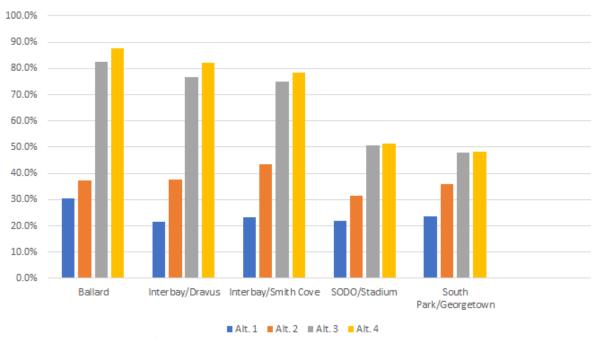
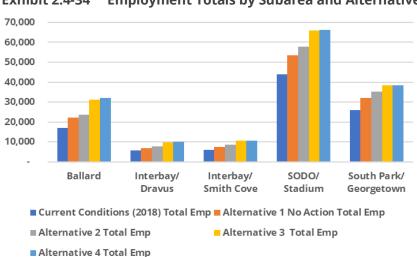


Exhibit 2.4-33 Percent Growth in Employment by Subarea



Sources: CAI, 2021; City of Seattle, 2021.

2.4.8 Alternatives Considered & Not Carried Forward

Following scoping, the City made some adjustments to the alternatives (see **Appendix A** for the scoping report) such as considering the sizing of recreation uses in some zones. Other ideas were considered but not carried forward.

The City considered scoping comments requesting more extensive changes to MIC boundaries, or requests for zoning allowing residential or mixed-uses across the study area at particular sites, and considered an alternative that would have de-designated the BINMIC as a MIC. However, the city determined that these approaches would not be likely to advance towards the proposal objectives and would not be in keeping with the intent of City decisionmakers and policymakers. Therefore, the City largely retained the focus of alternatives on industrial and maritime purposes.

- The EIS represents an implementation action of the recently completed Industry and Maritime Strategy and the alternatives are heavily informed by the recommendations of that strategy, including adding no significant new housing in industrial areas, and rather focusing primarily on industrial uses consistent with regional and city plans.
- The proposal includes a policy change calling for collaborative master planning of the Armory site. The site is within the MIC, and the proposal is that updated MIC policies and industrial zone designations will apply to the site. Should the State and partners wish to pursue non-industrial future uses, that would have to be determined in the master plan in partnership with the City and other entities.

The EIS does consider a policy to allow for individual MIC boundary adjustments during the periodic review or during the annual amendment process.

2.5 Benefits & Disadvantages of Delaying the Proposed Action

Benefits of the proposed action include strengthened protections for core industrial and maritime uses in established economic clusters, opportunities for emerging formats of industrial activity, higher levels of industrial and non-industrial job growth over time and expanded equitable access to living wage jobs (particularly for BIPOC youth), provisions for industry-supportive housing (such as caretakers' quarters and artist loft/maker studios) in targeted locations, and improved transportation conditions for multi-modal travel. In addition, the proposed action would improve transitions between the MICs and adjacent residential neighborhoods or urban villages and introduce nodes of high-density employment and multi-modal access near existing and planned high-capacity transit. Revisions to the MIC boundary in focused areas of Georgetown and South Park would also add additional mixed-use housing opportunities in these neighborhoods.

The proposed action may increase vulnerability to sea level rise and exposure to other environmental health hazards—such as noise, air pollution, and GHG emissions—by bringing more people into vulnerable areas, particularly in the Greater Duwamish MIC which has large geographic areas vulnerable to sea level rise impacts. Redevelopment that complies with requirements of the Shoreline Master Program and frequently flooded areas, along with adaptation measures, may decrease vulnerability to sea level rise relative to existing conditions. The proposed action would reduce air emissions below current levels though not as much as delaying the proposed action. Increasing employment density in the MICs, could contribute to regional efforts to limit vehicular GHG emissions.

Delaying the proposed action would limit the addition of industry-supportive housing or mixeduse housing in the small areas removed from the MIC, and delaying the corresponding increase in demand for parks and schools. Disadvantages of delaying the proposed action may limit the pace of potential investments in parks and streetscapes that tend to be implemented with residential or mixed-use development.

Delaying the proposed action would continue the present built environment conditions and result in lower levels or job growth over time. This may result in continued loss of industrial land to non-industrial uses because of existing market pressures to convert industrial land, "one off" zoning decisions, and encroachment of non-industrial uses in industrial zones. There would also be slightly lower demand for public services and utilities.

Delaying the proposed action would not integrate recommendations from the Industrial and Maritime Strategy advisory council into the Comprehensive Plan or zoning and development standards. Updated Subarea Plans for the MICs per VISION 2050 may also be delayed.