

The background of the document is a photograph of Seattle City Hall and other skyscrapers. The image is overlaid with a semi-transparent blue filter. The City Hall building is prominent in the foreground, with its name 'SEATTLE CITY HALL' visible on the stone facade. Other modern buildings with glass facades are visible in the background, along with some greenery on a hillside.

# Addendum

To the Final Environmental Impact Statement  
For the Seattle Industrial and Maritime Strategy

June 29, 2023

## Fact Sheet

**Project Title:** Environmental Impact Statement (EIS) for the Seattle Industrial and Maritime Strategy

**Proponent & Lead Agency** City of Seattle Office of Planning and Community Development (OPCD)

**Location:** The proposal addresses all lands in Seattle zoned Industrial General (IG1 and IG2), the Industrial Commercial (IC) zone, and the Industrial Buffer (IB) zone and land within two Manufacturing Industrial Centers (MIC): Seattle's Greater Duwamish Manufacturing and Industrial Center (Greater Duwamish MIC) and its Ballard Interbay North Manufacturing Industrial Center (BINMIC).

**Proposed Action:** The City of Seattle is studying a proposal to update its industrial and maritime policies and industrial zoning. The proposal would amend text policies and the future land use map of Seattle's Comprehensive Plan and update Seattle's industrial zoning in a new Chapter 23.50A. On June 8, 2023, the Seattle City Council Land Use Committee voted to approve ordinances to implement components of the proposal with several amendments to legislation that was proposed by Mayor Harrell. Amendments are substantially similar to alternatives that were studied in the Final EIS but could be considered a minor modification of the proposal. Pursuant to WAC 197-11-600 OPCD issues this EIS addendum to add analysis and information about the Industrial and Maritime Strategy proposal to address the amendments.

**Tentative Date of Implementation:** Summer 2023

**Responsible SEPA Official:** Rico Quirindongo, Director, OPCD

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**Date of Final EIS Issuance:** September 29, 2022

**Date of EIS Addendum Issuance:** June 29, 2023

**Review and Comment Period:** Comments on this addendum may be submitted to [Jim.Holmes@Seattle.gov](mailto:Jim.Holmes@Seattle.gov) by 5PM on July, 14 2023.

**Location of Documents and Background Information:** Please see the project website for the Final EIS and other related studies and documents: <https://www.seattle.gov/opcd/ongoing-initiatives/industrial-and-maritime-strategy>

**Required Approvals** The proposals have been reviewed by the Planning Commission and considered for approval by the City Council Land Use Committee. The proposals will be reviewed by the Washington Department of Commerce for a 60-day period prior to City action. The proposals must be approved by the full Seattle City Council

## Background

On September 29, 2022, the Office of Planning and Community Development (OPCD) issued the Industrial and Maritime Strategy Final Environmental Impact Statement (FEIS). In subsequent months OPCD developed legislation consistent with the preferred alternative in the FEIS for consideration by the City Council. This legislation consisted of five ordinances, each one implementing a different aspect of the preferred alternative studied in the FEIS.

On June 8, 2023, the Seattle City Council Land Use Committee voted to approve these ordinances with 11 amendments. This addendum refers to the amendments using the numbering and identification system from the Land Use Committee's June 8<sup>th</sup> meeting. The City Council Central Staff memorandum dated June 7, 2023, is attached in its entirety as Appendix A to this addendum and serves as a complete description of the amendments.

Two of the amendments, (amendment 3A and 3B from the June 7<sup>th</sup> Central Staff memo) were not recommended for approval by the Land Use Committee. Six of the amendments were within the range of the alternatives studied in the FEIS or were described as mitigation measures, and no additional environmental analysis is needed (Amendments 1, 4, 6, 7, 8 and 12). Five of the amendments are substantially similar to alternatives that were studied in the FEIS but could be considered a modification of the proposal evaluated in the FEIS (Amendments 10, 12, 13, 14, and 15). These five amendments would not change the analysis of significant impacts studied and identified in the FEIS and taken together the overall zoning proposal is most similar to the Preferred Alternative of all alternatives studied in the FEIS. Pursuant to WAC 197-11-600 OPCD issues this EIS addendum to add analysis and information about the Industrial and Maritime Strategy proposal to address the five noted amendments (**amendments 10, 12, 13, 14, and 15**). These amendments are not likely to result in any new likely significant environmental impacts beyond the impacts analyzed in the EIS nor does it create any new alternatives to the EIS.

The full City Council is expected to consider the proposed legislation on July 18, 2023. This addendum is issued, and the procedures for distribution and a 15-day comment period of WAC 197-11-625 and SMC 25.05 are followed. The comment period will be complete prior to full City Council final action so that the City Council may consider the addendum and comments on it in their final deliberation.

## Description of the Amendments

The five amendments addressed in this addendum are changes to proposed zoning maps and/or future land use maps that differ slightly from alternative maps studied in the FEIS alternatives 1-4 and the Preferred Alternative. Two of the map amendments are associated with a map amendment to the Comprehensive Future Land Use Map (FLUM) designation. Below is a brief description of the proposed amendments analyzed in this EIS Addendum.

- **Amendment #10 - Ballard Hub Urban Village.** Rezone the area generally bounded by Leary Avenue NW, 17th Avenue NW, and 20th Avenue NW from Industrial Commercial 65 (M) to Urban Industrial U/65 (UI U/65) and Neighborhood Commercial 3-75 (M1). This amendment converts approximately 1.5 acres of land that would have been zoned Industrial Commercial (IC) under the preferred alternative to the NC3-75 zone and approximately 5 acres to the Urban Industrial

zone. The change to Urban Industrial was studied in two of the EIS alternatives so discussion of this amendment in the addendum focuses on the portion changed to NC3-75.

- **Amendment #12 - Northwest BINMIC.** Amend the Future Land Use Map (FLUM) and other maps in the Comprehensive Plan to remove the area north of NW 48<sup>th</sup> Street and east of 9<sup>th</sup> Avenue NE from the Ballard-Interbay-Northend Manufacturing/Industrial Center (BINMIC). The amended area is approximately 4 acres in one city block. The amendment does not change the zoning from the Urban Industrial zone identified in the Preferred Alternative.
- **Amendment #13 – Interbay.** Rezone parcels along the south side of W Commodore Way at 31<sup>st</sup> Avenue W from IB U/45 and NR3 to C2-40 (M) and MML U/65 rather than UI U/45; Amend the FLUM and other maps in the Comprehensive Plan to remove the area south of W Commodore Way near 31<sup>st</sup> Avenue W from the BINMIC. Approximately 2 acres would be converted to the C2 zone and approximately 1/3 of an acre to the MML zone.
- **Amendment # 14 – SODO.** Rezone (1) the blocks bounded by South Forest Street, Utah Avenue S, S Hanford Street and Occidental Avenue S, along 1<sup>st</sup> Avenue S to the southwest of the SODO station; (2) the block bounded by Lander Street, 6<sup>th</sup> Avenue S, S Stacy Street, and 8<sup>th</sup> Avenue S, to the east of the SODO station; and (3) the blocks bounded by Lander Street, 5<sup>th</sup> Avenue S, S Forest Street, and 7<sup>th</sup> Avenue S, to the south and southeast of the SODO station from IG1 U/85 and IG2 U/85 to II U/160, rather than MML U/85. In total the II zone would be expanded by about 25 acres compared to the Preferred Alternative.
- **Amendment #15 – Georgetown.** Amend the FLUM and other maps in the Comprehensive Plan to remove the block on the west side of Airport Way S between S Lucile Street and Corson Avenue S from the Duwamish Manufacturing Industrial Center. Rezone three blocks between S Brandon Street and S Findlay Street and between 5<sup>th</sup> Avenue S and Maynard Avenue S from IG2 U/85 to UI U/85 rather than to MML U/85; and rezone the block on the west side of Airport Way S between S Lucile Street and Corson Avenue S from IG2 U/85 to NC3-55 (M) rather than to MML U/85. In total about 2.5 acres would be changed to NC3-55 and about 6 acres to Urban Industrial zoning.

## Analysis

The information provided in this addendum is based on an analysis of the proposed amendments to the Industrial and Maritime Strategy legislation for their potential to result in adverse impacts not identified in the Final EIS issued in September of 2022. The potential impacts from each amendment are compared to the thresholds of significance established in the FEIS. This addendum is organized according to the elements of the environment studied in the FEIS, sections 3.1 – 3.14. For each element of the environment this addendum contains additional information related to the five amendments, and a discussion of whether there would be an adverse impact stemming from the amendment. The degree of impact is evaluated as to whether it would exceed the threshold of significance. The discussion focuses on instances where there is a possibility for an amendment to create any additional adverse

impact. Where a specific amendment is not discussed under an element of the environment there is a negligible or no possibility that the change would create additional adverse impact.

### **3.1 SOILS/GEOLOGY**

The Industrial and Maritime Strategy EIS evaluated the impacts of 5 alternatives on soils and geology by evaluating existing conditions in the study area and the potential for construction activities associated with implementation of the industrial and maritime strategy to indirectly affect the Study Area. Impacts on soils/geology conditions are considered significant if they result in:

- Erosion that could not be contained on future development sites.
- Exposure of people to risk of injury or substantial damage to structures and infrastructure due to the creation or acceleration of a geologic hazard, such as slope failure, liquefaction, settlement.

**Amendment #10 Ballard Hub Urban Village, and Amendment #12 - Northwest BINMIC** are not located in areas that are subject to geologic hazards or limitations as set out and discussed in the FEIS and these amendments would not result in any impacts other than impacts common to all alternatives.

**Amendment #13 – Interbay** does not include areas subject to geologic hazards but is adjacent to an area identified as a potential land slide area. By designing development to the City’s adopted construction codes any potential for impact due to different uses or larger structures that could be built under the amendment would be mitigated. Therefore, the amendment would not be likely to increase the likelihood of significant adverse impact.

**Amendment #15 - Georgetown and Amendment # 14 - SODO** areas are not subject to geologic hazard or limitations with the exception that they are in a liquefaction prone area. These two amendments shift more land into the Industry and Innovation zone and the Urban Industrial zone instead of the Maritime Manufacturing and Logistics zone. Development under the amendment could place more intensive use pattern in a liquefaction prone area. The risk of damage to structures or injury from settlement or seismic events is considered significant but is avoidable with mitigation. In this case mitigation would be removing and replacing loose materials with compacted fill materials, by densifying or reinforcing the in-situ soils, or by supporting the proposed facilities on deep foundations or piles. The need for liquefaction mitigation would be evaluated on a case-by-case basis for the individual structural elements potentially impacted.

**Amendment # 14 - SODO:** includes an area southeast of 5<sup>th</sup> avenue South and south of S. Lander Street which is adjacent to an historic landfill. Potential impacts of vapor intrusion from historical landfills would be investigated by performing site-specific vapor intrusion assessments and/or by installing passive or active methane mitigation systems in structures developed on historical landfills, or within the 1,000-foot methane buffer. The same mitigation would be applied at the time of development with or without the amendment, and in both cases no additional residences would be introduced to the area. Therefore, the impact would be mitigated to a less than significant level.

### 3.2 AIR QUALITY AND GREEN HOUSE GAS (GHG) EMISSIONS

The FEIS included a review of regulatory standards for air quality, air emission sources and individual criteria pollutants of concern with a focus on carbon monoxide (CO), particulate matter (PM) emissions, ozone precursors, and Toxic Air Pollutants (TAPS). For air quality impacts, the analysis measures whether:

- The alternative would prevent or deter achieving the National Ambient Air Quality Standards (NAAQS) for criteria pollutants.

The GHG section describes community goals for GHG emissions and climate change, transportation, and land use emission sources in the industrial and maritime areas of Seattle, the methods used to measure GHG emissions, and how implementation of the alternatives considered in the EIS may contribute to global climate change. For purposes of the EIS, GHG impacts are analyzed to determine whether:

- The alternative would prevent or deter efforts to reduce emissions in comparison to local or regional goals or targets for GHG reductions.
- The alternative would cause the cumulative difference in GHG emissions between an alternative and Alternative 1 No Action to exceed Washington Department of Ecology's GHG reporting.

Under existing conditions and under all alternatives, the FEIS found that all portions of the study area met NAAQS for criteria pollutants and would not prevent or deter efforts to reduce emissions in comparison to local or regional goals. Due to improvements in technology and overall transition towards fuel economy and cleaner or renewable fuels, air quality would improve over the study time horizon. The proposed amendments do not alter this conclusion.

Air quality impacts from vehicle emissions and GHG emissions related to each alternative were evaluated by reviewing proposed land use changes and anticipated changes in employment, vehicle miles traveled (VMT), and commercial, industrial, and housing construction and post-construction activities. The FEIS concluded that all action alternatives would create a net increase in VMTs and resulting GHG emissions from growth and development in the study area compared to no action however the region-wide benefit of capturing development that might otherwise occur in peripheral areas of the city or region would offset these impacts. Location of additional amounts of the Industry and Innovation zone under the amendments, near light rail stations could strengthen this concentration effect. The proposed amendments would be small scale changes to the preferred alternative that would not alter the conclusion of the FEIS related to air quality. Total VMTs and resulting GHG emissions from the proposed action with the amendments would fall below those studied in Alternative 4.

All five of the amendments studied in the FEIS increase the number of residents or workers in areas adjacent to industrial activity and workers and residents could experience higher emissions resulting from industrial and other non-transportation air emissions. However, with existing requirements for operating permits from PSCAA, these manufacturing plants and other heavy and general industrial facilities are expected to remain compliant with air pollution control regulations that assure criteria air pollutant and TAP emissions meet standards. Additionally, the City is applying mitigation measures to require that new development of residential uses in the study area would have air filtration and cooling requirements, and other mitigation measures identified in the FEIS would be applied.

### 3.3 WATER RESOURCES

Analysis of impacts of the action alternatives studied in the Industrial and Maritime EIS used the following thresholds of significance:

- Development that results in discharges to surface waters that do not meet water quality or flow control standards.
- Development that eliminates groundwater recharge or results in groundwater that does not meet water quality standards.
- Development that increases vulnerability to sea level rise.

The FEIS found that under all proposed alternatives, any redevelopment or new development will require compliance with all applicable regulations to avoid, minimize, or mitigate any impacts to water resources. Development will need to meet stormwater requirements to protect surface and groundwater from increased flow or water quality impacts. Therefore, no significant unavoidable adverse impacts are anticipated on water resources under any of the proposed alternatives. The five proposed amendments would result to modest changes to the types and configurations of development in the areas affected by the amendments. This could include slightly larger structures, in the case of new II zoned areas, and a different mix of allowed uses including introduction of some residential use into more areas such as the **Ballard Hub Urban Village amendment #10**. In all of these cases the redevelopment under the amendments would similarly be required to comply with required regulations to avoid, minimize, or mitigate any impacts to water resources and would result in no additional adverse impacts related to discharge to surface waters, or groundwater recharge. None of the amendment areas are in areas with high susceptibility to sea level rise vulnerability. No additional significant adverse impacts are associated with the five proposed amendments analyzed in this addendum.

### 3.4 PLANTS AND ANIMALS

The Maritime and Industrial Strategy EIS acknowledges that the study area is highly urbanized, but still provides habitat for numerous plant and animal species. Many of these are nonnative introduced species, and most of them are well-adapted to the urban environment and high levels of human disturbance.

Thresholds of significance used for this impact analysis include:

- The potential to reduce or damage rare, uncommon, unique, or exceptional benthic, marine, wetland, riparian, or fish and wildlife habitat.
- The potential to harass, harm, wound or kill any species listed as federally threatened or endangered.
- The potential to adversely affect critical habitat for any federally threatened or endangered species.
- The potential to block migration corridors for special status species.
- Terrestrial noise levels generated exceed any established injury thresholds for any special status species.

The analysis considered potential impacts on plants in wildlife in the four subareas of the study area (Ballard, Interbay/Dravus, Interbay/Smith Cove, Sodo/Stadium, Georgetown/South Park), reviewed the current policy and regulatory frameworks, and reviewed the types of plants and wildlife found in the study area. Finally, the analysis identifies regulations that provide mitigation to potential impacts. These regulations include the Federal Clean Water Act, Washington State laws and review, when required by the Washington Departments of ecology and Fish and Wildlife, City of Seattle Critical Areas Regulations, Stormwater Regulations, Environmental Health Regulations.

The analysis in the EIS found that if all minimization and mitigation measures are implemented, no significant unavoidable adverse impacts are anticipated to plants and animals. The study area is already highly urbanized. Most plant species are nonnative introduced species common in urban environments. Development on industrial lands would not significantly reduce available habitat, particularly rare or unique habitat.

Terrestrial animal species are adapted to urban conditions and have a high tolerance for human disturbance. Additional noise and disturbance that would be generated under the different alternatives would not be likely to adversely affect species in the study area. The project does not involve changes to shoreline or critical area policies or regulations regarding in-water work and is not anticipated to result in direct noise and disturbance to aquatic species.

Redevelopment of previously developed areas provides opportunities to reduce urban runoff and pollutant loading to aquatic habitat, potentially contributing to improved water quality in the study area. Improved water quality would benefit special status aquatic species and critical habitat, as well as other animals that prey on aquatic species.

The proposed amendments would also be subject to the regulatory framework governing potential impacts to plants and animals and is likely to avoid significant adverse impacts.

**Amendment #13 – W. Commodore Way** includes land that is within an environmentally critical area mapped on the SDCI GIS website. Area affected by the amendment appears to be within a great blue heron pre-nesting area as identified by SDCI Director's Rule 13-2018. The Kiwanis Ravine is an area of a known great blue heron colony. The amendment includes land that is within the seasonal buffer identified in the Director's Rule. Amendment #13 changes zoning on one parcel from Neighborhood Residential 3 to Commercial 2 with a 40' height limit, and changes two additional parcels from the Industrial Buffer zone to the Commercial 2 zone with a 40' height limit. These changes would indirectly create incrementally more development pressure for commercial or mixed-use development, although redevelopment is possible with or without the zoning change. New development under the amendment could include more floor area and greater total lot coverage than in the absence of the amendment. However, new development could also increase vegetation and environmental conditions on the site by adding landscaping and new plantings.

Development on the affected sites of each amendment has the potential to create construction noises and dust that might cause disruptions which could bother herons. The sites are highly urbanized with warehouse structures and paved areas and do not include large trees in their current condition so it is unlikely that habitat directly used by the majestic birds for nesting would be altered due to the amendment. As a result of the potential for disruption due to construction, amendment #13 creates potential for moderate additional adverse impact. SDCI Director's Rule 13-2008 includes detailed and



specific guidance for habitat management plans, and the rule would be applied at the time of new development, which would decrease the potential for impact on herons. While there is the potential for moderate impact from the proposed amendment as discussed above the threshold for significant impact is not exceeded and there would be no significant adverse environmental impact.

### **3.5 CONTAMINATION**

The Maritime and Industrial Strategy EIS considered potential impacts related to contamination for each alternative. Contamination refers to potential for disturbance of existing contamination during redevelopment or operations, and the potential for new environmental contamination. The thresholds of significance used for this analysis includes:

- Release or contamination of soils, groundwater, or surface water that requires removal and disposal.
- Hazardous chemicals or conditions that might result in health or safety impacts or impede future development.

The analysis studied potential impacts in the study area and a secondary study area extending .25 miles from the full study area. The analysis presents an overview of existing conditions including Confirmed or Suspected Contaminated Sites (Exhibit 3.5-2/3.5-4) and Hazardous Waste and Toxics Reduction Sites (Exhibit 3.5-3/3.5-5). This analysis also includes an overview of the regulatory framework and lead agency with potential jurisdiction over clean-up activities.

The analysis found key impacts common to all alternatives:

- Development under any of the alternatives may encounter hazardous materials such as contaminated soil, soil vapor, groundwater, surface water, or sediments. The greatest potential for impacts associated with contamination would occur during construction when sites are disturbed.
- A soil and groundwater management plan could be necessary for construction activities in areas with known or suspected contamination. Contaminated soils excavated during construction activities would require special handling, transport, storage, and off-site disposal.
- Depending on groundwater depth and the type of hazardous materials, it is possible that contaminants from historic spills or releases may have infiltrated and migrated, requiring additional cleanup. Cleanup efforts implemented before or during construction would reduce potential short-term and long-term impacts
- For contaminated soil, the Model Toxics Control Act (MTCA) generally requires residential land uses to use the most protective cleanup levels established under MTCA Method A or B cleanup levels (WAC 173-340-740). These requirements apply to most land uses except those that meet the definition of “industrial property” as defined in WAC 173-340-200 and 173-340-745. For industrial properties, MTCA allows less restrictive soil cleanup levels established under MTCA Method A or C (WAC 173-340- 745) based on adult worker exposure scenarios only and including the use of institutional controls.

The EIS identifies regulations and commitments that will mitigate the potential for adverse impacts and concludes: No significant unavoidable adverse impacts would occur with the implementation of

mitigation measures. Hazardous materials sources would not impede redevelopment. Federal, state, and local regulations are in place to require cleanup of sites and to promote spill prevention. Redevelopment occurring under the proposed amendments will similarly be required to comply with existing regulations and commitments and are not likely to result in significant adverse impacts.

**Amendment #14 - SODO** includes land that is near to a former landfill site that would be included in the Industry and Innovation zone. The potential for impacts in the area are addressed above in 3.1 Soils/Geology and no additional significant adverse impacts would occur.

### 3.6 NOISE

The Industrial and Maritime Strategy EIS evaluates potential noise impacts associated with implementing the alternatives under consideration. The analysis includes a description of noise and noise levels in general, regulatory standards for noise, noise sources and potential sensitive noise receptors in the maritime and industrial areas of Seattle, the methods used to assess noise and impacts from noise, and an assessment of noise impacts associated with each alternative, as well as potentially feasible noise mitigation measures where appropriate. The EIS included original noise measurements in eight locations under existing conditions. This analysis evaluates noise conditions and potential impacts for each MIC on an area-wide cumulative basis and, and in specific areas where the alternatives consider greater degrees of change.

Regulatory thresholds are used to judge significance. If actions would meet regulatory thresholds, then the determination is typically that the level of impact is unlikely to be significant. For the purposes of this programmatic impact analysis, noise is analyzed by examining whether:

- The alternative would cause future traffic noise levels of 10 dBA or more above existing noise levels.
- After application of mitigation, the alternative fails to comply with SMC Maximum Allowable Sound Level for receivers.

The EIS outlines federal, state, and local noise regulations and presents an analysis of noise sensitive receptors the potential for noise impacts by source in each of the subareas. The analysis also describes how land use conflicts can emerge when sensitive receptors are located near industrial areas or heavily traveled roadways that generate high levels of noise. The analysis identifies a range of mitigation measures.

The FEIS concluded that under the studied alternatives, increased employment growth could result in increased traffic volumes that generate noise, though the resulting noise increases are not anticipated to exceed 3dBA, the threshold of change that is perceptible. With respect to noise generation from traffic, the proposed amendments represent diminimis changes to the preferred alternative and similarly, with mitigation are unlikely to result in significant adverse impacts.

The location of noise sensitive receivers like residential uses near industrial or traffic noise sources could occur under all alternatives, and three of the proposed amendments have the potential to increase the proximity of sensitive receptors to noise sources. **Amendments #10 Ballard Hub Urban Village, #13 West Commodore Way, and #15 Georgetown** could indirectly introduce the potential for more

residences to be located in proximity to industrial noise sources, and to roadways that generate traffic noises. Amendment #10 would allow for residential uses to be introduced in proximity to 15<sup>th</sup> Ave. NW., and Amendment #15 could allow for a limited number of residences in the Urban Industrial zone to be located in an area where noise from air traffic is present. The areas of new residential uses would be subject to residential noise mitigation standards for sound insulating windows requiring maintenance of interior sound levels below a specific decibel level, which will adequately reduce noise experienced by those sensitive receptors. With the application of the mitigation, no significant unavoidable adverse noise impacts would occur due to the proposed amendments.

### **3.7 LIGHT AND GLARE**

The Industrial and Maritime Strategy EIS discusses light and glare conditions in the study area and considers the impact of development under each of the alternatives on future conditions. Impacts of the alternatives on light and glare are considered significant if:

- Light and glare from new development has the potential to affect substantial numbers of residents, shoreline views, or protected scenic views (e.g., scenic routes, designated parks).

The FEIS impact analysis provides a description of potential light and glare impacts by zone.

- The MML zone is most similar to existing IG zones and would have the greatest light impacts. Lighting for cargo and storage areas and manufacturing facilities is generally less screened in these zones and result in the greatest light and glare emission.
- Light and glare impacts associated with the II zone are anticipated to be more similar to a commercial or mixed-use district than existing industrial areas. Without extensive outdoor areas requiring night-time lighting, exterior building illumination would be less intense, though taller allowable building heights could make buildings visible from farther away, depending on location and relative elevation.
- Development in UI areas is anticipated to generate relatively lower light emissions compared to existing industrial typologies and the proposed MML and II land use concepts, due to the smaller scale of development and a greater emphasis on vegetation and green space, which can screen exterior illumination from surrounding areas.

The FEIS considers the relative concentration of each zone in each alternative. Following a discussion of mitigation measures including proposed and existing regulations and commitments the FEIS finds that there would be no significant unavoidable adverse impacts.

New development under the proposed amendments will generate at least some increase in light and glare. The proposed amendments shift focused land areas from more intensive industrial zones to zones that would encourage more mixed-use commercial development and some residential uses compared to the preferred alternative. These shifts would reduce the potential for light and glare impacts from potential future development compared to the preferred alternative in the FEIS because industrial zones, especially the MML zone have the greatest potential for uses that generate light and glare impacts. Redevelopment under the provisions of the proposed amendments will also be subject to regulations and commitments including the City's SEPA policies regarding light and glare, regulatory provisions provided in the Seattle Municipal Code, and public view shed provisions of the Seattle Municipal code.

No significant adverse impact to light and glare would result from the proposed amendments analyzed in this addendum.

### 3.8 LAND AND SHORELINE USE

The Industrial and Maritime EIS evaluates the potential for the proposal to result in land and shoreline use impacts. The alternatives are expected to result in a land use impact if:

- Consistency with plans and policies. The action would result in an inconsistency between the predominant land use pattern and the stated land use goals and policies in the Comprehensive Plan and/or the VISION 2050 regional growth plan, Countywide Planning Policies, or Shoreline Master Program. The action would introduce a land use pattern that would foreclose future opportunities to reach goals and policies.
- Land use compatibility. The action would cause an increase in the prevalence of disparate activity levels and use patterns that would result in incompatibilities within industrial zones. Incompatibilities could undermine industrial and maritime operations, or the comfort and safety of employees or residents. Incompatibilities could be related to time of day/night activity, noise levels, odors, and conflicting movements by vehicles and other modes.
- Employment mix. The action would lead to changes to employment mix that would decrease the percentage and total quantity of jobs related to or supportive of industrial and maritime sectors, in Manufacturing Industrial Centers (MICs). The action would cause a high likelihood of voluntary or involuntary economic displacements of businesses in industrial maritime sectors widely throughout a subarea. It would preclude new opportunity for expansion of industrial and maritime employment through business formation and retention.
- Land use transitions. The action would create a land use pattern where high intensity / high impact uses would be likely to abut or encroach on adjacent non-industrial uses and concentrations of residential populations. These impacts can result from noise, light and glare, odor, or height, bulk, and scale of taller buildings adjacent to nonindustrial areas.

Land use impacts of the alternatives are considered significant if:

- There is an acute/severe adverse impact within one of the impact categories defined above.
- There are cumulative land use impacts in multiple categories within one of the defined study area subareas.

The FEIS found minor and moderate impacts related to land and shoreline use for all alternatives.

- Inconsistency with Plans and Policies: Some degree of inconsistency between the expected land use pattern and plans and policies was found for all the alternatives. Since consistency of land use patterns with plans and policies requires interpretation and balancing with many policies, it is common for some inconsistency to exist, while maintaining an overall predominant level of consistency. The FEIS found that moderate inconsistencies would be present under alternatives 3 and 4 and the Preferred Alternative due to the introduction of increased amount of industry-supportive housing, which can be viewed as inconsistent with some regional and local policies limiting residential uses in MICs. The FEIS also found that application of the MML zone would reduce the prevalence of non-industrial uses in industrial areas through new standards in the

proposed MML zone that close loopholes in existing Industrial General zones that allowed non-industrial development.

**Amendment #15 – Georgetown** increases the area of the Urban Industrial zone into several blocks. Some additional but limited industry supportive housing could result, which could incrementally increase the inconsistencies per the discussion above. However, the integrated conditional use development standards associated with that housing mitigate the impact down to a level that is not significant.

While several of the other amendments would change zoning in ways that could increase housing or commercial development compared to the preferred alternative (**Amendments 10, 12, 13**), these amendments would be outside of the designated Manufacturing Industrial Centers. This increases consistency with plans and policies relative to the Preferred Alternative because housing and commercial uses are more consistent with plans and policies for areas outside of MICs.

- Incompatible Land Uses: The FEIS found that Alternatives 3 and 4 and the Preferred Alternative would see moderate incompatible use impacts in some subareas—most notably Ballard, Stadium/SODO, and Georgetown/South Park—where introduction of new buildings with dense employment in the II zone and industry-supportive housing in the UI zone could create incompatibilities between new activity patterns and adjacent areas of continued industrial uses.

**Amendment #14 SODO** could increase the degree of land use incompatibility because the amendment expands the geographic size of the II zone further from the SODO/Lander light rail station. The larger area of II zoning could impact the operation of more industrial users and introduce more instances of incongruent office or service workers activities with nearby industrial activities. However, by creating a larger contiguous area of II zoning, the amendment also has the potential to create a more complete and connected area of new redevelopment – since development in the II zone would be required to upgrade streets, sidewalks, and would upgrade the aesthetics of the environment. Some of the expanded II area is into places, such as along 1<sup>st</sup> Ave. S. that already have clusters of retail and public-facing businesses, which mitigates the potential for impact. Overall the degree of change from the preferred alternative is not enough to increase the impact beyond a moderate level.

**Amendment #15 – Georgetown** would expand the Urban Industrial zone for several blocks. This could incrementally increase incompatibilities in the area if new limited residential uses are closely located with distribution and warehousing activities in the area. However, the area of the amendment also includes several existing non-conforming single family home structures and the addition of the Urban Industrial zone in those blocks could increase compatibility with those existing non-conforming structures if new development with housing or small-scale public facing businesses are introduced under the new Urban Industrial zone.

- Inadequate Transitions: The FEIS found that potential for inadequate transitions from industrial to nonindustrial areas is highest for the Ballard and Interbay Dravus subareas. Moderate impacts at transitions would be expected in the Ballard and Interbay Dravus subareas under all the alternatives. In general, portions of the study area that abut residential and urban village locations without strong physical edge features such as greenbelts, major roadways or

topographical changes have greater potential for inadequate transition. Future land use under the UI zone is expected to assuage potentially inadequate transitions to residential and urban village areas. Minor transition impacts are identified for the Georgetown/South Park Subarea under all the alternatives, and for the SODO/Stadium/SODO Subarea under the Preferred Alternative.

**Amendments #12 Northwest BINMIC, #13 Interbay, and #15 Georgetown** would improve land use transitions. All of these amendments could create a more gradual transition condition between residential uses and industrial uses. Amendment #15 would increase the depth of the Urban Industrial zone at the edge of the MIC between an MML zoned area and a residential neighborhood. Amendment #13 would remove one block of land from the MIC creating the potential for a mixed use commercial development that could provide a transition between the BINMIC and the lowrise residential neighborhood immediately to its northeast. And amendment #13 would add an area of commercial zoning at the edge of the MIC between the Magnolia residential area and an MML zone.

**Amendment #10** would not substantially increase transitions because the land is already located in the Ballard Hub Urban Village and the change to Urban Industrial and Neighborhood Commercial would not reduce transitions compared to the development that can occur today in the Industrial Commercial zone. **Amendment #14** would not create transition impacts because the transition from the II zone to an MML zone is an appropriate and intended transition between the two industrial zones.

- Employment Mix Impacts: With one exception, no employment mix impacts are expected. In all subareas combined under all alternatives, the projected employment mix would remain 50% or more industrial—one of the threshold criteria for regional designation as a MIC. A minor employment mix impact was identified in Alternative 4 and the Preferred Alternative for the Ballard subarea, where the percentage of industrial employment is projected to fall to a level approaching the 50% threshold. The proposed amendments that address the BINMIC would not create additional adverse employment mix impacts, because the amendments are in areas outside of the MIC, or remove areas from the MIC that might be candidates for commercial or other non-industrial uses. **Amendment #14 SODO** could introduce additional non-industrial employment into the greater Duwamish MIC if development in the expanded II zone occurs. The development would also include industrial uses. As noted elsewhere in this addendum, due to the marginal feasibility of II zone prototype developments under current conditions, the principle effect of the expanded II area is to distribute the employment growth that would otherwise occur under the preferred alternative to a slightly larger geographic area.

Under all the alternatives, any inconsistencies with plans and policies, incompatible land uses, undesired employment mixes, or inadequate land use transitions described above would be minimized and reduced to less than significant levels via incorporated plan features and existing regulations and commitments. No significant unavoidable adverse impacts to land or shoreline use are anticipated under the alternatives studied in the FEIS and the proposed amendments do not alter that conclusion.

### 3.9 HOUSING

Three impact thresholds were used to identify potential adverse housing impacts in the study area in the FEIS. Impacts of the alternatives on housing are considered significant if they:

- Result in loss of housing due to redevelopment and insufficient development capacity, tools, or programs to address displacement of dwellings and population.
- Potential to increase households' exposure to air pollution, noise pollution, or environmental hazards in census tracts identified as having high environmental health disparities and with sensitive populations.
- Creation of demand for housing that cannot be accommodated within the city in adjacent districts or areas where housing is planned.

Under all alternatives additional growth and development will occur in the study area, with small changes in the mix of housing. This change is unavoidable but is not considered significant or adverse within an urban area designated as an employment center in the Comprehensive Plan. No significant loss of existing housing due to redevelopment is anticipated under any of the alternatives studied in the EIS, and the proposed amendments would not contribute to a loss of housing. Several of the amendments including **#10 Ballard Hub Urban Village, #12 Northwest BINMIC, and #15 Georgetown** could incrementally increase housing supply over time. New housing under the Urban Industrial zone in the area of amendment #15 would include workforce housing requirements and new housing in the area of amendment #10 will be subject to Mandatory Housing Affordability (MHA). With existing and new development regulations, and anti-displacement programs currently in place, no significant adverse impacts are anticipated with respect to loss of housing.

The FEIS finds that increases in housing in certain areas could increase households' exposure to air pollution, noise pollution, or environmental hazards in census tracts identified as having high environmental health disparities and with sensitive populations. **Amendments #10 Ballard Hub Urban Village and #15 Georgetown** would incrementally increase the likelihood of new residents to be subject to such exposures. However, with the application of air quality and noise mitigation measures that are also implemented in the proposed amendment areas the impacts are reduced to a level such that no significant adverse impacts would occur with respect to these environmental health factors.

Increases in employment growth in the study area may shift some demand for housing. The increment of employment growth with the proposed amendments remains within the citywide amount that the City will plan for in the 2024 Major Comprehensive Plan update and is not substantially different from the development pattern in the preferred alternative. **Amendment #14 SODO** creates potential for an increment of additional impact on housing because the increased amount of Industry and Innovation zoning could potentially indirectly increase the quantity of job growth in the SODO area, which creates some potential for more demand for housing in Seattle. While recognizing the potential for additional job growth from this amendment, the increment would be moderated because of the marginal feasibility of II zone prototype development observed at the time of this addendum. The primary effect of Amendment #14 is that the job growth estimated under the preferred alternative in the SODO would be distributed over a slightly larger geographic area during the planning time horizon. Even if there is an increment of job growth that would result from the amendment, the additional demand on housing will be easily absorbed by the large increase in housing capacity in Seattle that is expected to stem from

zoning changes made under HB 1110 and other zoning updates after the One Seattle major Comprehensive plan update. The proposed amendments are therefore unlikely to result in significant unavoidable adverse impacts on housing.

### 3.10 TRANSPORTATION

The Industrial and Maritime EIS presents a multimodal transportation evaluation of the potential impacts of implementing the range of land use alternatives under consideration. Significant transportation impacts and potential mitigation strategies are identified for the Action Alternatives based on the policies and recommendations established in local plans. Thresholds of significance utilized in this impact analysis include:

- Lengthy travel times on key corridors designated as major truck streets.
- Peak hour volumes on key corridors that cannot be accommodated by roadway capacity.
- Mode shares in conflict with City goals.
- Transit demand on key corridors that cannot be accommodated by planned service.
- Increases in pedestrian and bicycle demand in locations with network gaps or preclusion of planned pedestrian and bicycle improvements.
- Substantive increases in parking demand in excess of parking supply.
- Increases in serious and fatal crash rates in the study area

FEIS analysis included travel times on the designated major truck street network, mode share of journey to work, LOS at select screen lines (both mode share and screen line approach is set out in *Seattle 2035*). The analysis then outlines the current policy framework including an overview of Move Seattle, the Freight Master Plan, the Transit Master Plan, the Pedestrian Master Plan, Complete Streets, Intelligent Transportation Systems (ITS) Strategic Plan.

The FEIS found impacts common to all alternatives in the following categories:

- Freight and Mobility Access; Corridor-specific travel time findings for roadway users—including freight—are presented by alternative in the FEIS. Although freight uses the same facilities, traffic congestion is more difficult for large trucks to navigate, and trucks typically travel at slower speeds than general auto traffic. For those freight corridors that are projected to experience increased congestion compared to Alternative 1 No Action, it is also expected that travel time reliability may be affected.
- Active Transportation: It is expected that pedestrian and bicycle activity will continue to increase compared to existing conditions, both due to overall growth in the study area as well as an increasing share of people walking and biking. All alternatives would create more demand in areas that lack sidewalks, curb ramps, pedestrian crossings, and dedicated bicycle facilities.
- Parking: While parking demand varies throughout the study area, there are some localized areas where on-street parking demand exceeds parking supply, particularly demand for truck parking given the industrial nature of the MICs. Given projected growth throughout the city and that on-street parking is unlikely to increase in the future, a parking impact is expected under Alternative



1 No Action. With the increase in development expected under the Action Alternatives, parking demand would be higher than Alternative 1 No Action.

- **Safety:** The contribution of future growth to an increase in VMTs. In terms of relative exposure among the alternatives, alternatives 3 and 4 are expected to have more substantive VMT increases in the Duwamish compared to Alternative 2 and the Preferred Alternative. Likewise, VMT increases are greater in the BINMIC under alternatives 3 and 4, compared to more limited increases under Alternative 2 and the Preferred Alternative.
- **Pavement Condition:** As noted above, the Action Alternatives are expected to result in an increased number of vehicle miles traveled in the Greater Duwamish MIC and BINMIC, areas of which already have worn pavement condition due to regular heavy vehicle use. While increased use of these roadways may incrementally degrade pavement condition further, vehicles are subject to gas taxes and weight-based license fees that can be directed toward more frequent maintenance of facilities. Therefore, while the Action Alternatives may cause some impact to roadway pavement condition, it is not expected to rise to a level of significance.

The analysis provides an overview of potential mitigation strategies including existing regulations and policy commitments, construction of transportation projects identified in the modal plans to facilitate freight movement, active transportation, and safety.

The transportation analysis found that significant adverse impacts to transportation would occur as a result of the Action Alternatives. With respect to active transportation, corridor travel times (affecting autos, freight, and buses), mode share and on-street parking mitigation measures could reduce the degree of impact down to a non-significant level for the Preferred Alternative with the amendments. The proposed amendments will potentially result in an increase in VMTs and use of active transportation facilities compared to the preferred alternative, however the level of VMTs and active transportation users remains below that of Alternative 4. The proposed action with amendments remains closest to the Preferred Alternative of any of the alternatives. **Amendment #14 SODO** creates some possibility for additional job growth which could impact corridor travel times and on-street parking by expanding the amount of the II zone. However, as noted elsewhere in this addendum, the principal effect of the expanded II zone in SODO would be to distribute the quantity of job growth of the preferred alternative over a slightly larger geographic area. Mitigation measures are integrated to address transportation impacts in the II zone including requirements for a transportation management plan, parking maximums quantities for new development, and explicit requirements for street and trail improvements with new development. Due to these factors the amendment would not alter the conclusion of the FEIS that impacts to active transportation, corridor travel time, mode share and on-street parking could be mitigated down to a level that is below the threshold of significance.

The FEIS found that significant impacts were identified to safety due to the projected increase in people walking, and biking, and rolling in areas with network gaps and the increased potential for vehicle conflicts (particularly trucks) and rail with vulnerable users. While the City can pursue a variety of mitigation measures to improve active transportation facilities for people walking and biking and pursue supplemental funding through federal or state programs, it is not expected that all network gaps can be addressed given the number of locations needing improvement and the limited funding available. Amendment #14 could incrementally increase these impacts by extending the II zone in SODO to a larger

geographic area, which could extend the need for improved pedestrian and bicycle facilities to a larger area. More development in the II zone over a long time span could also help build out pedestrian and bicycle facilities in association with development. The amendment would not alter the conclusion of the FEIS that the action alternatives including amendments could have significant unavoidable adverse impacts to active transportation safety. Similarly, these other amendments would not result in creating any significant adverse impacts to active transportation.

### **3.11 HISTORIC, ARCHAEOLOGICAL AND CULTURAL RESOURCES**

The Industrial and Maritime Strategy EIS details the current historic, archaeological, and cultural resources policy and regulatory frameworks, describes the current conditions (affected environment), analyzes the alternatives' potential impacts on historic, archaeological, and cultural resources, and suggests possible mitigation measures. Impacts on historic, archaeological, and cultural resources are considered significant if they result in:

- Substantial adverse changes to, alteration, or loss of a resource that impacts its eligibility for inclusion in the National Register of Historic Places (NRHP) or the Washington Heritage Register (WHR), or as a City of Seattle Landmark (SL). Resources that are not eligible for these registers will not be adversely impacted by the proposed alternatives.

Impacts to historic, archaeological, and cultural resources in the study areas from the No Action Alternative and three Action Alternatives were identified by assessing potential for both above and below-ground changes. Such impacts are actions that would alter, directly or indirectly, any of the characteristics of a historic property in such a way that would diminish its integrity of location, design, setting, materials, workmanship, feeling, and association, and would affect its eligibility to qualify for inclusion in the NRHP or other historic registers.

The analysis finds that since development may occur in any location in the study area under any alternative, it is possible that cultural resources could be impacted under each alternative. Changes to zoning that allows a wider range of industrial or non-industrial uses could spur redevelopment in those locations. This could occur, for example, where the Industry and Innovation or Urban Industrial Districts allow for more mixed industrial/office near station areas, or caretakers' quarters and makers studios for live/work options throughout the study area. This could also occur where areas are removed from the MIC and allowed for mixed-use residential near Georgetown and South Park. Even where there are no formally designated historic landmarks, there are numerous properties with historic period buildings, or a very high or high risk of archaeological resources.

This FEIS provides a range of mitigation strategies including identifying federal, state, and local laws regarding preservation of historic and cultural resources and identifies additional actions that could be taken to enhance mitigation efforts.

The analysis concludes that all the alternatives have some potential for adverse impacts to historic, archaeological, and cultural resources in the MICs. Such impacts can include physical alteration, damage, or destruction of all or part of a resource; alteration of the characteristics of the surrounding environment that contribute to the property's significance; and the introduction of visual or audible elements that are out of character with the property. Such impacts could alter the characteristics of a

historic property in such a way as to diminish its integrity thus affecting its eligibility to qualify for inclusion in the NRHP. No additional significant adverse impacts are anticipated under the Action Alternatives as compared to Alternative 1 No Action, and the proposed five amendments analyzed in this addendum do not alter this conclusion.

**Amendment #10 - Ballard Hub Urban Village, Amendment #15 – Georgetown, and Amendment #14 - SODO** have the potential to incrementally increase the potential for indirect impact on historic resources because the zoning changes in those areas to Urban Industrial and Industry and Innovation respectively, are in areas of the city with a relatively higher concentration of historic aged structures. The zoning changes due to the amendments could incrementally increase the likelihood of new development that could alter resources or change the context of the urban environment near to other clusters of historic resources. In Georgetown amendment #15 is near Seattle designated Landmarks such as the Rainier Brewery buildings, and Amendment #10 Ballard Hub Urban Village is several blocks from the Ballard Avenue Historic Landmark District. None of the proposed amendments include land that contains any already-designated Seattle historic landmarks or is in a designated historic landmark district.

### **3.12 OPEN SPACE AND RECREATION**

The FEIS analyzes the potential for open space and recreation impacts. Open space and recreation discussed include parks, trails, public shoreline access, and water access. The primary government agency offering these facilities is Seattle Parks and Recreation (SPR). The Port of Seattle also provides shoreline access and recreational opportunities in the study area(s). The Seattle Office of Sustainability and Environment (OSE) also provides partnership and coordination to advance equity and environmental justice goals. Impacts of the alternatives on open space and recreation are considered significant if they:

- Result in insufficient parks, open space, and trail capacity to serve expected population or employment based on levels of service.
- Feature inconsistencies with shoreline public access policies.
- Have the potential to decrease public access to parks and open space or shoreline access in census tracts identified as high disadvantage in the Seattle Racial and Social Equity Composite Index.

The analysis describes the existing conditions, the Level of Service standards for open space and recreation across the city, outlines policies and plans establishing open space and recreation goals across the City. Mitigation strategies include existing regulations and commitments, potential construction of new parks, and other measures beyond construction of new parks.

The analysis found that changes driven by housing and employment are anticipated to increase population and employment growth within the study area. The City of Seattle maintains a goal of 8 acres of parkland per 1,000 residents. This means that across all alternative's population growth will have an impact on the acres of parkland required within the study area and the subareas. The primary possible impacts across alternatives would be demand on existing parks and demand for future parkland.

No significant unavoidable adverse impacts to open space and recreation were identified for the FEIS alternatives, and the proposed amendments would not introduce enough population or job growth to alter this conclusion. While population and employment growth would occur under all studied

alternatives, there are opportunities to meet the City's level of service for parkland through implementation of the Seattle plans and current and proposed development regulations.

**Amendment #14 SODO** creates potential for an increment of additional impact on open space because the increased amount of Industry and Innovation zoning could potentially indirectly increase the quantity of job growth in the SODO area, which creates some potential for more demand for open space. While recognizing the potential for additional job growth from this amendment, the increment would be moderated because of the marginal feasibility of II zone prototype development observed at the time of this addendum. The primary effect of Amendment #14 is that the job growth estimated under the preferred alternative in the SODO would be distributed over a slightly larger geographic area during the planning time horizon. The amount of job growth would still be below the amount estimated for Alternative #4 of the FEIS. **Amendment #10 - Ballard Hub Urban Village** has the potential for minor indirect impact on open space because it could introduce additional housing in a 1.5 acre area of Ballard that would be changed to a Neighborhood Commercial zone, adding residents with a need to access open space. In this instance the location in the Ballard Hub Urban Village, which contains existing open space opportunities and is a high priority for open space and connectivity mitigates the potential for adverse impact from the zoning change down to a negligible level. These incremental impacts do not alter the FEIS conclusion of no significant unavoidable adverse impact on open space. Amendment #12 - NW BINMIC, will have little to no impact on parks and open space as removing this area from the BINMIC and retaining industrial zoning it will not add development capacity. Amendments. The remaining amendments Amendment 13 – Interbay, and Amendment 15- Georgetown could potentially have minor impacts on parks and open space in that they make possible the addition of limited number of new residential units where they had previously been prohibited.

### 3.13 PUBLIC SERVICES

The Industrial and Maritime EIS evaluated the potential for public service impacts for each of the alternatives. Public services discussed in this section include fire, police, school, and library services. The primary providers of these services for the study area are the Seattle Fire Department (SFD), the Seattle Police Department (SPD), the Port of Seattle Police Department (POSPD), Seattle Public Schools (SPS), and the Seattle Library System (SLS). The Primary Study Area includes industrially zoned lands both inside and outside of the manufacturing industrial centers. Secondary Study Areas include fire stations, police stations, schools, and libraries in proximity to the Primary Study Area.

Impacts of the alternatives on public services are considered significant if they:

- Negatively affect the response times for police and/or fire and emergency medical services.
  - Increase demand for special emergency services beyond current operational capabilities of service providers.
  - Result in increases in students and lack of facilities unanticipated in district plans or that would reduce adopted levels of service.

The analysis provides an overview of current conditions for each of the public services identified above. For police and fire, the overview of current conditions includes an inventory of facilities, volume of calls for police (including Port of Seattle Police) and fire from 2016 to 2020, response times, and facility

planning. and identified which precincts serve each subarea. For schools and libraries, the EIS inventories facilities by subarea.

Mitigation measures identified for public service impacts primarily relies on existing regulations and commitments. For fire and emergency services this means compliance with the International Fire Code, Seattle Municipal code regulations including Title 22 Subtitle VI Fire Code, Title 10 Health and Safety, Title 11 Vehicles and Traffic and Title 23 Land Use Code. For police this means ongoing enforcement of City of Seattle regulations, ongoing evaluation of where best to focus resources, and ongoing capital improvement planning. For Schools and Libraries this means ongoing capital facilities management planning. The analysis found that for all alternatives, potential impacts are driven by population increase, building height and density (for fire), hazardous materials (for fire), construction (for fire) and transportation network and traffic volumes.

All studied alternatives would increase the demand for public services with alternatives 2, 3, and 4 and the Preferred Alternative increasing jobs above No Action. The increase in industrial jobs could result in a greater need for fire and emergency services. Increased non-industrial jobs would require apparatus for taller structures in the case of fire or rescue.

All alternatives, particularly alternatives 3 and 4 and the Preferred Alternative would increase housing and increase demand for school and library services.

No significant unavoidable adverse impacts to fire and emergency medical services, police, or schools and libraries are anticipated with application of mitigation measures and regular capital planning. The proposed amendments are subject to the same forces that could drive impacts, such as population increase and increased pressure on the transportation network, but with application of mitigation measures are unlikely to result in significant unavoidable adverse impacts.

### **3.14 UTILITIES**

The FEIS documents the effected environment, impacts, mitigation measures, and significant unavoidable impacts of the public utilities that provide services to the study area.

Impacts of the alternatives on utilities are considered significant if they:

- Are inconsistent with utility system planned growth and capital plans.
- Have the potential to require major new projects or initiatives for energy system upgrades to accommodate redevelopment.

The analysis in the FEIS includes a description of the affected environment service providers. The analysis documents, by subarea, the existing wastewater and combined sewer system and electrical power system.

The analysis found several potential impacts for all alternatives:

- **Wastewater and Combined Sewer:** Development under any of the alternatives could result in greater demands on the local wastewater collection system and on the downstream conveyance and treatment facilities. Increased wastewater flow is related to increased water consumption.

- Stormwater: In general, increases in impervious area result in higher peak flows and total runoff, but because the majority of the Primary Study Area is impervious, redevelopment expected under all alternatives is not expected to significantly increase total impervious area.
- Electrical Power: Under all alternatives, including the No Action Alternative, future growth and development would increase demand for electrical energy.

Mitigation strategies include existing regulations and commitments including compliance with federal, state, and local wastewater regulations, Capital improvement programs of King County and the Seattle of Seattle and identifies other potential measures including conservation strategies or construction of LEED compliant buildings.

No significant unavoidable adverse impacts on wastewater and combined sewer systems are anticipated based on the proposed amendments. The levels of development proposed under all alternatives are expected to be managed through King County WTD and SPU's existing, ongoing processes for identifying CIP projects to address system capacity issues and reduce CSO frequency. The proposed amendments, if adopted, would still result in redevelopment levels below those projected for Alternatives 3 and 4 and would not result in significant adverse impacts.

No significant unavoidable adverse impacts on the stormwater system are anticipated based on the five proposed amendments studied in the addendum. New development allowed under any alternative would be required to meet City stormwater codes that would likely improve stormwater management (i.e., reduced flow rates and improved water quality) relative to existing conditions, and CIP projects identified in the study area as part of SPU's asset management program would improve system capacity and performance.

No significant unavoidable adverse impacts on the electrical system are anticipated for these amendments. Recent SCL investments in the power system are anticipated to meet growth needs under all studied alternatives and development proposals that require specific improvements to the system would be addressed at a planning level through regular capital planning cycles as well as on a project-by-project basis.

None of the amendments analyzed in this addendum are substantial enough changes relative to the overall non-project action, or to the type and nature of development that could indirectly occur due to the proposal, to alter the conclusions of the FEIS with respect to utilities.

## **Appendix A**

**Seattle City Council Central Staff Memo Dated June 7, 2023**