

*(Date)*

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

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

### **Executive Summary**

- Environmental analysis of the Industrial and Maritime Strategy must ensure that any zoning proposals move to repair the harms of the past and benefit affected communities through both public and private investment.
- The Planning Commission recommends specifically identifying the key differences between the two M/ICs when documenting impacts and proposing mitigation measures for each.
- We recommend that the EIS identify how much total industrial space is needed for the City to reach its growth projections, identify the impacts of protecting industrial and maritime lands, reference potential displacement pressures, and identify the benefits of anti-displacement measures and incentives.
- The Planning Commission has significant concerns with the broad impacts on housing citywide and throughout the region resulting from increased employment growth under the Action Alternatives. We are concerned that the proposed mitigation measures may not be sufficient to address the housing needs associated with the significant job growth.
- We request that the EIS clearly identify how future light rail stations will interact with the surrounding and/or adjacent industrial and maritime lands. Analyze the potentially competing demands of protecting industrial lands and robust ridership at all station locations.
- The EIS should identify what types of transportation capital projects are required to keep pace with the change in jobs resulting from the Action Alternatives, conduct an equity analysis to identify impacts from conflicts between freight traffic and other modes in communities without sufficient non-motorized infrastructure, and conduct an inventory and gap analysis of walking and biking facilities in industrial areas, especially around future light rail stations.
- The Planning Commission strongly suggests directly soliciting feedback from potentially affected tribes beyond “distribution” of the DEIS. The tribes should be consulted to identify areas of cultural significance, industrial uses that could create physical or economic impacts to tribal fisheries, natural or cultural resources, and help develop appropriate mitigation strategies. We recommend explicit recognition of impacts to the cultural and historic importance of indigenous land, including the ancestral lands of the Duwamish, Suquamish, Stillaguamish, and Muckleshoot Tribes.

## Equity and Environmental Justice

### *Additional Analysis Needed:*

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

### *Requested Mitigation:*

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

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

Existing inequities in industrial and maritime areas are exacerbated when considering the differences between current and future conditions in the Ballard/Interbay/Northend M/IC (BINMIC) and the Greater Duwamish M/IC. The Greater Duwamish M/IC has a long history of pollution and contamination that has affected the adjacent communities and natural resources of the area, most significantly the Duwamish River which has been designated as a Superfund cleanup site. Many people who catch and consume fish from the Duwamish River are low-income recreational and/or subsistence fishers, including Native American communities or first-generation immigrants and their families. Industrial activity in the BINMIC has historically been limited to a smaller geographic area and mix of uses. **The EIS should specifically identify this disparity when documenting impacts and proposing mitigation measures for each of the two M/ICs. While this analysis may exist within individual chapters of the EIS, we recommend that the Summary chapter and introductions to each major chapter address the differences between the M/ICs.**

We appreciate that the DEIS considers how the alternatives advance the City's Equity and Environment Agenda as well as the Duwamish Valley Program and Action Plan by screening whether the alternatives would increase, exacerbate, or impede mitigation of environmental justice. The Planning Commission commends the City for listening to the Duwamish Valley communities in

crafting zoning proposals consistent with these communities' desires. **We respectfully request the analysis of environmental health impacts to both residents and workers in these areas from exposures to environmental hazards such as air pollution, contamination, and noise under all alternatives in the Final EIS.**

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

### **Comments on Alternatives, Elements, Impacts, and Mitigation Measures**

#### Land and Shoreline Use

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

#### *Additional Analysis Needed:*

- Identify how much total industrial space is needed for the City to reach its growth projections.
- Specifically identify which of the sub-areas studied will likely receive job growth and require additional investment and how this may create or exacerbate economic segregation impacts.
- Identify the impacts of protecting industrial and maritime lands, reference potential displacement pressures, and identify the benefits of anti-displacement measures and incentives.
- Analyze the regional economic impact of combining land usable for manufacturing jobs with other uses as a result of the Industry and Innovation and Urban Industrial land use concepts.
- Analyze the economic impacts of the land use alternatives in light rail station areas, including an economic development feasibility analysis of the Industry and Innovation land use concept.
- Analyze impacts of locating makerspaces and other creative uses within non-industrial neighborhoods, urban villages, and mixed-use zones.
- Analyze the economic feasibility of establishing higher standards for landscaping and multi-modal transportation to create healthier transitions within single-use industrial zones.

- Evaluate the City's Shoreline Master Program's effectiveness in maritime and industrial areas to strengthen protection of currently undeveloped shorelines and to promote strategies to improve water quality treatment and flood resiliency.

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

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

**We recommend that the DEIS identify how much total industrial space is needed for the City to reach its growth projections as identified in the Puget Sound Regional Council's Vision 2050 and King County's Countywide Planning Policies.** The EIS should clearly document economic impacts such as demand for industrial property, square footage rents, and projected vacancy rates. The Planning Commission suggests seeking input from industrial stakeholders for this analysis, rather than rely on data generated by City staff or its consultants. **We request that the EIS specifically identify which of the sub-areas studied will likely receive job growth and require additional investment and how this may create or exacerbate economic segregation impacts. We recommend that the land use and economic analysis in the EIS identify the impacts of protecting industrial and maritime lands, reference potential displacement pressures, and identify the benefits of anti-displacement measures and incentives. We also suggest analyzing the regional economic impact of combining land usable for manufacturing jobs with other uses as a result of the Industry and Innovation and Urban Industrial land use concepts.** While we understand that economic analysis may be beyond the scope of the EIS, we strongly encourage this analysis to fully understand the implications of these land use concepts, to compare the Action Alternatives, and to inform the final policy decisions.

The Planning Commission has consistently encouraged a comprehensive approach in determining a mix of uses in the walksheds around future light rail stations in industrial areas that optimizes the light rail investments without diminishing the functionality and viability of existing industrial and maritime lands. **We recommend the EIS analyze the economic impacts of the various land use alternatives in these station areas, including an economic development feasibility analysis of**

**the Industry and Innovation land use concept.** The DEIS states that Action Alternatives that introduce the Industry and Innovation and Urban Industrial zones in larger areas could create incompatibilities between new activity and adjacent areas of continued industrial uses. The analysis concludes that these transition impacts are most likely for the Ballard and Interbay Dravus subareas. **We support establishment of the Urban Industrial zone, including higher standards for landscaping and multi-modal transportation to create healthier transitions, but also recommend analyzing impacts of locating makerspaces and other creative uses within non-industrial neighborhoods, urban villages, and mixed-use zones. We further recommend analyzing the economic feasibility of establishing higher standards for landscaping and multi-modal transportation to create healthier transitions within single-use industrial zones.**

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

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

### Housing

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

### *Additional Analysis Needed:*

- Include a jobs/housing analysis to identify the capacity of areas adjacent to the M/ICs that allow housing to accommodate the projected number of jobs under each alternative.
- Identify the current and future housing capacity outside Seattle that will be accessible via light rail. Consult Sound Transit's West Seattle and Ballard Link Extensions DEIS for projected ridership metrics.

- Analyze the impacts of residential uses in industrial areas through an environmental justice and public health lens and adjust the mitigation measures as necessary.
- Analyze and document the trade-offs associated with allowing industry-supportive residential uses.

*Requested Mitigations:*

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

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

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

The Industrial and Maritime Strategy's final recommendations include limited adjustments to existing allowances in transitional zones to support industry and arts entrepreneurship opportunities. The DEIS states that additional flexibility for industry-supportive housing in Alternatives 3 and 4 could result in an estimated 610 - 2, 195 new homes in industrial zones. The Planning Commission has consistently expressed its significant concerns around allowing residential uses in industrial areas, including the potential for increased development pressure and encroachment into the industrial zones. In addition,

we have ongoing concerns related to the environmental health impacts of residential uses in proximity to air quality and noise emissions. **We recommend the EIS analyze the impacts of residential uses in industrial areas through an environmental justice and public health lens and adjust the mitigation measures as necessary.** This analysis should cross-reference impacts identified in the Air Quality, Contamination, Noise, Transportation, Open Space and Recreation, and Public Services elements of the EIS. **We also request that the EIS analyze and document the trade-offs associated with allowing industry-supportive residential uses, including impacts on available industrial lands and any negative impacts to manufacturing and industrial uses against the potential benefits of providing additional housing and leveraging transit investments.**

### Transportation

#### *Additional Analysis Needed:*

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

#### *Requested Mitigations:*

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

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

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

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

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

#### Biological Resources and Resiliency

##### *Additional Analysis Needed:*

- Clearly identify risks of all construction in liquefaction zones, including not only buildings but also water, wastewater, and transportation infrastructure.



- Analyze detailed air quality impacts on residential areas near industrial zones such as South Park and Georgetown. Analyze potential air quality and public health impacts of co-locating offices and other non-industrial uses above industrial spaces in the Industry and Innovation land use concept.
- Analyze and document future projections of rainfall and stormwater flows. Evaluate the extent of existing stormwater and water quality impacts in industrial and maritime areas and whether the Action Alternatives can provide significant beneficial impacts. Identify opportunities for increasing innovative green infrastructure in industrial zones. Identify specific areas at risk for sea level rise and evaluate the impacts of adding density to these areas under each of the Action Alternatives.
- Identify the ecosystem benefits of adding green infrastructure and increasing trees and green landscaping in and near the M/ICs.

#### *Soils/Geology*

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

#### *Air Quality & Greenhouse Gases*

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

#### *Water Resources*

The DEIS states that higher levels of redevelopment under all alternatives would result in more stormwater management and water quality treatment compared to existing conditions. The analysis concludes that if mitigation measures are implemented there would be no significant unavoidable

adverse impacts to water resources and redevelopment would improve stormwater management relative to existing conditions. **The Planning Commission recommends the EIS analyze and document future projections of rainfall and stormwater flows.** Climate change will result in heavier precipitation that needs to be accounted for. This is especially important because of the potential for compounding impacts on existing drainage issues in industrial areas. **We also recommend assessing not only future impacts relative to existing impacts, but also evaluating the extent of existing stormwater and water quality impacts in industrial and maritime areas and whether the Action Alternatives can provide significant beneficial impacts.** Identifying this is key to developing positive resiliency, not maintaining feedback loops that perpetuate harm. For example, Section 3-92 discusses how redevelopment is not anticipated to significantly increase impervious surfaces, flow rates, or water quality. This analysis should be reframed to identify how the alternatives have the potential to remove impervious surfaces, decrease flow rates, or improve water quality. **The Planning Commission recommends the EIS identify opportunities for increasing innovative green infrastructure in the industrial zones to protect water quality, support the health of our waterways, and serve as a climate mitigation strategy.**

The DEIS states that all alternatives may increase vulnerability to sea level rise in areas adjacent to tidally influenced water bodies. The Planning Commission recognizes the severity of the potential impacts of sea level rise on key industrial and maritime areas and is concerned that the proposed mitigation to implement adaptation strategies from the City's 2017 Preparing for Climate Change report may be insufficient to address this impact. **The EIS should identify specific areas of SODO, South Park, Ballard, and Interbay at risk for sea level rise and evaluate the impacts of adding density to these areas under each of the Action Alternatives.**

#### *Plants & Animals*

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

#### Environmental Health and Compatibility

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

#### *Additional Analysis Needed:*

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

*Requested Mitigations:*

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

*Contamination*

The DEIS states that the risk of releasing contaminants from construction activities is significant under all alternatives, but avoidable with mitigation. **The Planning Commission recommends that the EIS identify and analyze any potential contamination impacts on future residential uses in or near industrial areas.** We are also concerned that existing residential areas near industrial zones such as South Park and Georgetown have ongoing pollution issues that should be addressed by this strategy. **The Planning Commission recommends restoration of lands and shorelines with industrial contamination as a mitigation measure to reduce public health concerns, including contaminants in fish from waterways adjacent to industrial areas.** Another potential mitigation measure would be to develop a strategy and form partnerships to address the greater number of contaminated sites present in the Greater Duwamish M/IC as compared with the BNMIC. An innovative redistribution program could be established to collect funds from development activities in the BNMIC and apply those to cleaning up contaminated sites in the Greater Duwamish M/IC.

*Noise*

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

*Historic, Archaeological, & Cultural Resources*

The DEIS states that there is potential for alteration, damage, or destruction of historic, archaeological, and cultural resources under all alternatives. One of the mitigation measures listed is to develop histories of the study area centering indigenous perspectives. However, the Planning Commission is concerned that the list of data sources in Section 1.7.11 (page 1-62) does not include tribal consultation. **We strongly suggest directly soliciting feedback from potentially affected tribes beyond “distribution” of the DEIS. The tribes should be consulted to identify areas of cultural**

**significance, industrial uses that could create physical or economic impacts to tribal fisheries, natural or cultural resources, and help develop appropriate mitigation strategies.** We suggest codifying consultation with the Duwamish Tribe to redress historic exclusion, despite the tribe not yet being federally recognized. Within the body of the DEIS, the Duwamish Tribe is listed under Community Organizations instead of with Tribes. This could be modified with an asterisk if necessary. Also, in Section 1.3.2 (page 1-6), we recommend listing specific indigenous tribes as well as acknowledging other settlement in addition to Euro-American settlement. **More broadly, the Planning Commission recommends explicit recognition of and attention to impacts to the cultural and historic importance of indigenous land, including the ancestral lands of the Duwamish, Suquamish, Stillaguamish, and Muckleshoot Tribes.**

#### *Open Space & Recreation*

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

#### *Public Services*

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

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

Sincerely,

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