



Chapter 4

Comments & Responses

4.1 Introduction

The City received 137 comments from the tribes, agencies, organizations, and individuals listed in **Exhibit 4.1-1** and **Exhibit 4.1-2** during the Draft EIS comment period. The Draft EIS was published on December 16, 2021 with a 45-day comment period from December 16, 2021 to January 31, 2022. The comment period was extended to March 2, 2022. Additional engagement was conducted with the Georgetown and South Park communities through April 15, 2022. Comments were received via e-mail, the online commenting survey, and at the January 11, 2022 and January 12, 2022 virtual public hearings.

The issues raised in each comment letter and verbal statement are numbered and provided correspondingly numbered responses. Comments that state preferences on alternatives or other matters are acknowledged with a response that the comment is noted and forwarded to City decision makers. Comments that address methods, analysis results, mitigation, or other matters are provided a response. See **Section 4.2** for the response to common comment themes, **Section 4.3** for individual responses to comments, and **Section 4.4** for the marked comment letters and public hearing transcripts.

Exhibit 4.1-1 List of Written Commenters

Number	Last Name	First Name	Date	Agency/Organization
Tribes/Indigenous				
1	Hansen	Cecile	3/2/2022	The Duwamish Tribe
State/Regional/Local Agencies				
2	Cotten	Mike	2/28/2022	Washington State Department of Transportation
3	Curtis	Joshua et al.	3/2/2022	Washington State Major League Baseball Stadium Public Facilities District (PFD), Washington State Public Stadium Authority (PSA)
4	Felleman	Fred	3/2/2022	Port of Seattle The Northwest Seaport Alliance
5	Saganic	Erik	2/18/2022	Puget Sound Clean Air Agency
6	Inghram	Paul	3/2/2022	Puget Sound Regional Council
7	Panganiban	Justin	1/25/2022	Seattle Department of Transportation
8	Acutanza	Jeanne	3/2/2022	Seattle Freight Advisory Board
9	Mohler	Rick et al.	2/18/2022	Seattle Planning Commission
10	Gannon	Rob	2/28/2022	Seattle Public Schools
11	Persak	John	2/28/2022	The Office of Economic Development
Special Interest Organizations/Corporations				
12	Brower	Joshua	3/2/2022	Brower Law, Salmon Bay Sand and Gravel Company
13	Burke	Suzanne	3/2/2022	Freemont Dock Company via Houlihan Law
14	Ciserella	Mike	3/3/2022	Cantera Development Group
15	Clark	Mel	3/9/2022	CleanTech Alliance

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Number	Last Name	First Name	Date	Agency/Organization
16	Clawson	Jessica	3/2/2022	Interbay Urban Investors
17	Clawson	Jessica	3/2/2022	Madisonian Manager, LLC
18	Clawson	Jessica	3/2/2022	AnMarCo
19	Daniels	Kevin	3/1/2022	First and Utah Street Associates, LLC
20	Ffitch	Eric	3/2/2022	BNSF Railway Company, Freezer Longline Coalition, ILWU Local 19, Inlandboatmen’s Union of the Pacific, Manufacturing Industrial Council, North Seattle Industrial Association, Pacific Merchant Shipping Association, Port of Seattle, Puget Sound Pilots, Seattle Marine Business Coalition, The Northwest Seaport Alliance, Transportation Institute, Vigor, Washington Maritime Federation, Port of Seattle, Puget Sound Pilots, Seattle Marine Business Coalition, The Northwest Seaport Alliance, Transportation Institute, Vigor, Washington Maritime Federation
21	Fu	Peggi	3/2/2022	NAIOP Washington State
22	Gering	Dave	3/2/2022	Manufacturing Industrial Council
23	Gilder	Ginny	3/9/2022	Gilder Office for Growth, LLC
24	Gillespie	Robert	2/28/2022	Lander Street Partners, LLC
25	Gillespie	Steve	3/2/2022	Hess Callahan Grey
26	Goodman	Erin	2/15/2022	SODO BIA
	Goodman	Erin	1/24/2022	SODO BIA
27	Horn	Colleen	3/2/2022	MAK Management, LLC
28	Howard	Lisa	2/11/2022	Alliance for Pioneer Square
29	Johnson	Kathleen	2/27/2022	Historic South Downtown
30	Krohn	Herb	3/3/2022	SMART Transportation Division, United Transportation Union
31	Lehmann	Ted	3/2/2022	Industrial and Maritime Strategy Council
	Lehmann	Ted	2/23/2022	Industrial and Maritime Strategy Council
32	Loe	Laura	3/2/2022	Share The Cities Action Fund
33	Malshuk	Nicholas	3/1/2022	First South Properties, LLC
34	McCullough	John	3/2/2022	Seattle Industrial Lands Coalition
35	Nelson	Patty	3/3/2022	Elliott Way Partners, LLC
36	Nitze	Peter	2/23/2022	Nitze-Stagen
37	Printz	Peggy	3/2/2022	Seattle Cruise Control
38	Rivera	Fred	3/1/2022	Seattle Mariners
39	Ugles	Herald et al.	3/1/2022	International Longshore and Warehouse Union Locals 19, 52, and 98, Inland Boatmens Union
40	Selig	Jordan	3/2/2022	J Selig Real Estate, LLC
41	Trohimovich	Tim	1/31/2022	Futurewise
42	Tucker	Tarrance	2/28/2022	Pacific Christian Academy
43	Vaughn	Greg	2/22/2022	GPG&C Investment Group LLC
44	Weed	Mark	3/1/2022	SoDo Industrial Coalition

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Number	Last Name	First Name	Date	Agency/Organization
Individuals				
45	Aggen	Angie	2/24/2022	Individual
46	Anane	Layla	2/24/2022	Individual
47	Anawalt	Bradley	3/4/2022	Individual
48	Baker	Dan	2/17/2022	Individual
49	Brubeck	Donald	3/1/2022	Individual
50	Burg	Jack	2/28/2022	Individual
51	Bush	Erica	1/26/2022	Individual
52	Clark	Justin	2/21/2022	Individual
53	Corbin	Lisa	3/2/2022	Individual
54	Dee	Katherine	2/28/2022	Individual
	Dee	Kate	2/19/2022	Individual
55	Devine	Paul	3/2/2022	Individual
56	Dickinson	Anne	2/28/2022	Individual
57	Dillon	Ann	3/1/2022	Individual
58	DiMartino	Janie	2/24/2022	Individual
59	Dubicki	Raymond	3/1/2022	Individual
60	Dunn	Kathleen	3/2/2022	Individual
61	Eldridge	Xen	2/19/2022	Individual
62	Fragada	Tony	3/2/2022	Individual
63	Frishholz	Christine	2/24/2022	Individual
64	Fiorito	Dan	1/31/2022	Individual
65	Graham	Kirsten	2/24/2022	Individual
66	Greene	Angela	2/28/2022	Individual
67	Hammerberg	Rita	3/1/2022	Individual
68	Hanlon	Robert	3/29/222	Individual
69	Huling	Sharon	2/24/2022	Individual
70	Kartchner	Dylan	2/25/2022	Individual
71	Katz	Andrew	3/2/2022	Individual
72	Kromm	Richard	2/28/2022	Individual
73	Lau	Wayne	2/28/2022	Individual
74	Lewis	Maggie	2/28/2022	Individual
75	Livingston	Robert	3/1/2022	Individual
76	Main	Bonnie	2/24/2022	Individual
77	Mathison	Jon	2/2/2022	Individual
78	Menin	Andrea	3/2/2022	Individual
79	Olofson	Bree	2/28/2022	Individual

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Number	Last Name	First Name	Date	Agency/Organization
80	Perry	Chuck	3/2/2022	Individual
81	Personett	Wendy	2/26/2022	Individual
82	Phillips	Maria	2/28/2022	Individual
83	Robinson	Kathryn	2/24/2022	Individual
84	Shaffer	Brett	3/1/2022	Individual
85	Shaw	Aaron	2/24/2022	Individual
86	Standifer	Nancy	2/28/2022	Individual
87	Strohmeier	Jill	2/28/2022	Individual
88	Sundquist	Stephen	2/25/2022	Individual
89	Wood	Shawn	2/24/2022	Individual
90	Anonymous	Aiden	2/18/2022	Individual
Comments via Georgetown / South Park Engagement				
91	Schaefer	Rachel	4/15/2022	Cascade Bicycle Club
92	Fong	Alice	4/15/2022	Center for Ethical Leadership
93	—	—	4/15/2022	Duwamish River Accountability Group
94	Bush	Erica	4/15/2022	Duwamish Valley Safe Streets
95	Farrazaino	Samuel	4/15/2022	Equinox Development Unlimited LLC
96	Ramirez	George	4/14/2022	Georgetown Community Council, King County International Airport Community Coalition
97	Hampton-Clarridge	Adrienne	4/15/2022	Georgetown Community Council, King County International Airport Community Coalition, Duwamish River Community Coalition, Duwamish Valley Affordable Housing Coalition, Duwamish Valley Safe Streets
98	Davidson	Sara Ann	4/15/2022	Georgetown Merchants Association
99	Bookwalter	Jake	4/15/2022	Georgetown Youth Council
100	—	—	4/10/2022	Seattle Bicycle Advisory Board
101	Schwartz	Robin	4/14/2022	South Park Neighborhood Association (SPNA)
102	Simson	Cari	4/15/2022	Urban Systems Design
103	Benetua	Michelle	4/15/2022	Individual
104	Bookwalter	Emmett	4/14/2022	Individual
105	Bookwalter	Melissa	4/14/2022	Individual
106	Bushue	Cedar	4/11/2022	Individual
107	Carpenter	Karen Paola	4/15/2022	Individual
108	Claxton	Jo	4/15/2022	Individual
109	Cocking	Penny	4/15/2022	Individual
110	Dae	Tiffany	4/15/2022	Individual
111	Del Rio	Eleana	4/15/2022	Individual
112	Facundo	Victor	4/14/2022	Individual

Number	Last Name	First Name	Date	Agency/Organization
113	Gallagher	Erin	4/15/2022	Individual
114	Kirschenbaum	John	4/15/2022	Individual
115	Knowles	Melissa	4/14/2022	Individual
116	Krejci	Holly	4/15/2022	Individual
117	Lanen	Steve	4/15/2022	Individual
118	Madison	Tracy	4/15/2022	Individual
119	Medina	Rosario	4/15/2022	Individual
120	Miller	Kate	4/15/2022	Individual
121	Morrison	Kay	4/15/2022	Individual
122	Neil	Tim	4/15/2022	Individual
123	Nyland	Kathy	4/15/2022	Individual
124	Nyland	Kelsey	4/15/2022	Individual
125	Rajcich	Brooke	4/14/2022	Individual
126	Rivera	Melina	4/15/2022	Individual
127	Ryan	Maureen	4/15/2022	Individual
128	Schiffer	Andrew	4/15/2022	Individual
129	Smith	Ethan	4/15/2022	Individual
130	St John	Peter	4/12/2022	Individual
131	Sweet	M. Anne	4/15/2022	Individual
132	Terrenzio	Andrea	4/15/2022	Individual
133	Tilley	Joanne	4/14/2022	Individual
134	Veloria	Velma	4/15/2022	Individual
135	White	Maya	4/15/2022	Individual
136	Woo	Anita	4/14/2022	Individual
137	Wright	Laura	4/15/2022	Individual

Exhibit 4.1-2 List of Verbal Commenters from the Public Hearings

Number	Last Name	First Name	Hearing Date	Agency/Organization
H1	Curtis	Josh	1/11/2022	Washington State Ballpark Public Facilities District
H2	Marchione	John	1/11/2022	Washington State Public Stadium Authority
H3	—	Scott	1/12/2022	Individual
H4	Williams Jr.	Dennis	1/12/2022	Individual
H5	Loe	Laura	1/12/2022	Share The Cities Action Fund
H6	—	Scott	1/12/2022	Individual

4.2 Response to Common Comment Themes

Below is a list of common comment themes and comprehensive responses. Individual responses to comments refer to relevant discussions.

4.2.1 Economic & Market Analysis

Comment Theme: Request for economic feasibility, cost-estimates, or market analysis.

Response: SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). Separate from the EIS, the City considered economic feasibility information in preparation of draft zoning changes and/or Comprehensive Plan change proposal. The City also solicited input from property owner and development stakeholders when drafting development standards. Economic feasibility of development is affected by many factors, including unpredictable and frequently changing market conditions. The time horizon of the EIS is over 20 years, and factors that affect the short-term feasibility of development are likely to change over the study period. The City has considered the best available information on economic feasibility and will continue to conduct additional economic feasibility testing when preparing zoning change legislation. The Preferred Alternative includes refinements to development standards especially for the Industry and Innovation (II) zone in consideration of economic feasibility of development.

4.2.2 Non-Conforming Uses

Comment Theme: Concern about nonconforming uses under the proposed land use concepts.

Response: Nonconforming uses are permitted to continue subject to provisions of the Seattle Land Use Regulations (SMC Subtitle III). Under existing regulations, a nonconforming use that has been discontinued for more than 12 consecutive months shall not be reestablished or recommenced (SMC 23.42.104(B)) and would need to adhere to the underlying zoning regulations if redeveloped. As a part of the proposal the City would add flexibility for nonconforming uses in the Maritime Manufacturing and Logistics (MML) zone. In the MML zone special accommodation would be given to allow nonindustrial uses that exceed maximum size of use limits prior to the adoption of legislation establishing the MML zone to reestablish or recommence without a time limit. Additional flexibility would also be provided to allow for existing commercial office uses with an operational connection to an industrial use or an existing Information Computer Technology (ICT) uses to expand beyond maximum size of use limits.

4.2.3 Industry Supportive Housing

Comment Theme: Clarify the definition of industry supportive housing.

Response: In Draft EIS alternatives the concept of industry supportive housing is included in alternatives 3 and 4 in the Urban Industrial (UI) zone. Under Alternative 3 it would mean allowances for a.) up to two caretakers' quarters in which an owner or employee of an on-site business could reside, and b.) workspace studios in which a person who operates a making-use or arts business could live in a combined quarters with their workspace. Under Alternative 3 the maximum density of the total number of caretakers quarters and workspace studios is 25 per acre. Under Alternative 4 the same concept would apply with slightly more liberal allowances of up to three caretakers' quarters per business and a maximum density of 50 per acre. Note that in the Preferred Alternative housing would in the UI zone as a conditional use in criteria-limited locations would not be occupancy limited to the industry supportive housing concept. Under the Preferred Alternative the limited industry supportive housing standard could be met when a developer either a.) conforms to the same occupancy limitations as in Alternative 4, or b.) provides a minimum of 50% of the housing units at a level that is affordable to households with incomes at 90% of the Area Median Income (AMI) or below. The intent to make housing available to workers close to jobs is carried through all the alternatives, but the alternatives evaluate different variations of the development standards, which would result in slightly different quantities or types of homes.

4.2.4 Light Rail Coordination

Comment Theme: EIS doesn't adequately incorporate Link light rail analysis or results of the Sound Transit West Seattle and Ballard Link Extension (WSBLE) Draft EIS.

Response: The EIS does consider planning for the WSBLE light rail. The addition of new light rail service in WSBLE is one of the drivers of the proposed action as indicated in Objective F, and further described in **Section 2.2.1 Emerging Factors Affecting Seattle's MICs**. The locations and patterns of proposed zoning changes under the alternatives directly respond to the potential WSBLE station locations. The transportation analysis includes the effects of the future light rail on the transportation system. The WSBLE Draft EIS was released on January 28, 2022, and its analysis and information is considered in preparation of this Final EIS.

Comments were received from community members in and around the Georgetown neighborhood during an extended comment period provided to those community members. Several comment themes from those letters are addressed here and cross-referenced below.

4.2.5 Georgetown Arts & Culture

Comment Theme: The EIS should include more analysis of impacts on arts and cultural spaces, facilities, and communities in the Georgetown area. Concern that the alternatives studied threaten affordable arts and performance spaces.

Response: The retention and preservation of arts communities and resources in Georgetown is important to the City and has been elaborated further in the Preferred Alternative and this Final EIS. Additional description of these valuable communities is added in the existing land uses description. Potential impacts on arts communities from the Alternatives is included in discussion of potential displacement impacts in the **Section 3.9 Housing** and **Section 3.8 Land & Shoreline Use**. Additional detail on potential development standards to encourage retention and preservation of arts spaces is included in the Final EIS, as a component of the Mixed Use zone in the Preferred Alternative. The Mixed Use zone would include specific measures to incentivize the creation and/or preservation of arts space. Details of such development standards could continue to be refined with participation by community before any zoning changes are made. Non-land use actions to support arts and culture in Georgetown are ongoing outside of the proposals studied in this EIS. These efforts include City funding support for the Mini Mart City Park arts-centered community center, and City and State support for the authorization of tax-exempt revenue bonds for Equinox Studios / the Georgetown Community Development Authority to finance nonprofit facilities for the benefit of local artists and artisans, which may include housing, and funding to the Georgetown Merchants Association through the Economic Recovery Fund for activities including promotion and marketing.

4.2.6 Georgetown Buffer Areas

Comment Theme: Alternatives should include proposals to provide larger buffer areas between residential and mixed use areas of Georgetown, and heavier industrial areas. Accomplish this by studying conversion of more and larger geographic areas from MML zoning to the UI zone, or a Commercial 2 zone or mixed use zone.

Response: EIS alternatives study a range of potential geographic patterns of proposed zoning changes. In response to this comment, the Preferred Alternative includes a larger area of UI zoning in Georgetown compared to the Draft EIS alternatives. A new stretch of UI zoning is included for land in the vicinity of S Orcas Street to the northeast of 7th Avenue S and the existing Commercially zoned area on 4th Avenue S. The effect of this addition is to create a larger contiguous area of UI, Mixed Use, and residential zoning comprising a cohesive Georgetown neighborhood area. The Preferred Alternative also includes conversion of land from industrial zoning to a Mixed Use zone in a larger geography than Draft EIS alternatives. The City acknowledges that some Georgetown residential community members comments request even larger areas to be taken out of the MML zone. Alternatives are crafted in consideration of the proposal's objectives.

4.2.7 Commitment to Mitigation Measures

Comment Theme: Mitigation measures are only suggested. The City should provide firm commitments to enacting mitigation measures potentially including legislation to memorialize commitments to mitigation measures.

Response: The City and its consultant team prepared the non-project EIS in accordance with SEPA laws. The EIS identifies possible mitigation measures that will reduce or eliminate adverse environmental impacts of a proposal. These are detailed by topic in Chapter 3, and the other potential mitigation measures in addition to plans and codes are listed in [Appendix J EIS Mitigation Measures List](#). Many mitigation measures respond to the evaluation of the proposal and are presented to decisionmakers (Mayor and Council) as optional actions they could choose to take in conjunction with the proposed action, in light of the impacts that are disclosed in the EIS. Decisionmakers determine what combination of the action (if any) and mitigation measures they wish to take. An action may still be taken even if there are impacts if decisionmakers believe it would be in the public interest after considering all the information. For some mitigation measures it is uncertain whether the measures are technically feasible or economically practical. The EIS only looks at mitigation measures that address impacts attributable to the adverse impacts of this proposal. It is an option for the Mayor and/or City Council to make a statement of commitment to certain mitigation measures in conjunction with their decision to implement land use policy or code changes. This could come in forms including but not limited to a Resolution or City budget line item. OPCD intends to continue working with community and decisionmakers after the Final EIS to explore potential commitments to mitigation measures.

4.2.8 Community Engagement

Comment Theme: Concern that the EIS process did not include enough community engagement, only engaged certain stakeholders, or did not adequately engage historically disproportionately impacted communities.

Response: The City extended the Draft EIS comment period specifically for Georgetown and South park residents an additional 45 days and held numerous in-person and online meetings to speak with those community members. The Draft EIS comment period had already been extended to 75 days prior to the special extension for Georgetown and South Park residents. The EIS process adhered to all of the SEPA required notice and comment period requirements, including required public hearings. The City translated Draft EIS executive summary material into Spanish, Vietnamese, Somali and Chinese. Interpretation was provided at community meetings in Georgetown and South Park. The EIS process is not the only opportunity for community engagement. The City will continue to work with communities after the Final EIS to engage them during the legislative phase to provide further input on possible policy or zoning changes before they are made. Community engagement separate from this land use proposal is also ongoing as part of the Duwamish Valley Action Plan and other project-specific efforts.

4.2.9 Consider Strategy & Comprehensive Plan

Comment Theme: Suggestion that the Industrial and Maritime Strategy should be addressed as a part of the Comprehensive Plan 10-year major update, and as an independent action or study.

Response: The contents of this proposal are being closely coordinated with the Comprehensive Plan major update. Land use concepts and zones proposed and studied in this EIS, and growth estimates in this EIS will be incorporated into the public engagement and proposed alternatives of the One Seattle Comprehensive Plan major update. The community will have additional opportunities to provide input on the City's overall growth strategy as part of the Comprehensive Plan major update. The City considers the Industrial and Maritime Strategy to be a distinct subject area worthy of a topic-specific study and land use policy proposals because there are unique attributes and issues related to industrial lands and designated Manufacturing and Industrial Centers.

4.2.10 Housing Instead of Industrial Uses

Comment Theme: There is a need for more housing in the City, and the City should allow more housing in the MIC study areas.

Response: The purpose of Manufacturing Industrial Centers (MICs) is to protect industrial uses that offer jobs important to the local and regional economy and that offer wages that can support households and are accessible to those without higher education. The Puget Sound Regional Council (PSRC) has designated the MICs and has adopted policies and requirements the City needs to honor in subarea planning. See **Section 3.8** of the EIS. These policies include limitations on residential uses:

- Establish strategies to avoid land uses that are incompatible with manufacturing/industrial uses, such as large retail uses, residential uses, or non-related office uses (other than as an accessory use).
- The MIC study areas contain little housing. The Draft EIS Action Alternatives consider industry-supported housing in the form of caretakers and artists/live-work housing, as well as small, targeted adjustments to the Greater Duwamish MIC in the Georgetown and South Park areas to address community needs. For the Preferred Alternative, two new areas outside the MICs in west Ballard and Judkins Park would be converted to mixed use zoning allowing housing, in addition to the proposed mixed-use areas in Georgetown and South Park studied in Draft EIS alternatives. Overall, a higher total amount of housing production outside of MICs would result compared to Draft EIS alternatives—an additional 1,534 dwellings, 42% more than alternatives 3 and 4. In total, nearly 3,000 new homes are projected to be generated under the Preferred Alternative compared to the No Action Alternative.

- The EIS also offers mitigation measures to apply the MHA program to the new II zone to help address demand for housing and this action would generate funding from new development of commercial space in industrial zones for affordable housing.

4.2.11 Modify MIC Boundaries or Uses

Comment Theme: Allow for changes to the MIC Boundaries.

Response: MICs are drawn to identify areas where manufacturing and industrial uses predominate and to protect such uses for the long-term as unique job centers, consistent with VISION 2050 and the regional growth strategy. Recognizing the importance of the industrial and maritime jobs in the MICs, the EIS action alternatives propose a policy to consider MIC boundary adjustments comprehensively. The proposed policy included in EIS **Appendix C** is:

LU 10.3 Ensure predictability and permanence for industrial activities in industrial areas by limiting changes in industrial land use designation. There should be no reclassification of industrial land to a non-industrial land use category or amendments to the boundaries of manufacturing industrial centers except as part of a City-initiated comprehensive study and review of industrial land use policies or as part of a major update to the Comprehensive Plan.

The Action Alternatives consider altering about 22 acres and the Preferred Alternative about 53 acres to non-MIC status in the Georgetown and South Park areas to address compatibility and local community needs. Out of 6,936 acres in the study area this is less than 1%. The small amount of MIC boundary adjustments and the proposed policy to limit removal of land from MICs respond to the objectives of the proposal (**Exhibit 2.1-2**).

4.3 Individual Responses to Comments

The issues raised in each comment letter and at the public hearings are numbered on the letters and hearing transcripts in **Section 4.4**. Responses to individual comments are detailed below in **Exhibit 4.3-1** and **Exhibit 4.3-2**.

4.3.1 Written Comments & Responses

Exhibit 4.3-1 Written Comments and Responses

Number	Comment Summary	Response
1	Hansen	The Duwamish Tribe
1-1	Appreciate inclusion and would like to explore a community benefits agreement.	Thank you for your letter. The comment is noted and forwarded to City decision makers.
1-2	Support the UI strategy to ensure stronger land use protections for core industrial and maritime areas, high density industrial near public transit, and affordable small-scale light industrial businesses in southwest Seattle.	The comment is noted and forwarded to City decision makers.
1-3	Recommend expanding the current footprint of the designated Urban Villages beyond the 6% allotment to include Duwamish Greenbelt properties adjacent or contiguous to the Duwamish Longhouse and Cultural Center, Ha Ah Poos Park, and Herring House. Allow for natural buffer	The comment is noted and forwarded to City decision makers. This proposal could be considered in the Comprehensive Plan Update as it addresses land use designations largely outside the MIC.
1-4	Request access and notification of any earthwork or groundwork performed in the SODO Stadium and Georgetown subareas. Request any evidence or artifacts gathered to be presented and turned over to the Duwamish Tribe.	All cultural resources survey and archaeological work will follow best practices and standard archaeological techniques in the discovery and preservation of cultural and historical artifacts. See revisions made to Section 3.11 Historic, Archaeological, & Cultural Resources that clarify this approach.
1-5	Request that any historic, archaeological, or historic resource uncovered during groundwork be preserved and presented and turned over to the Duwamish Tribe.	The City of Seattle Shoreline Master Program Regulations are referenced in Seattle Municipal Code section 23.60A. 23.60A.154 outlines the standards for archaeological and historic resources which are in line with the request by the Duwamish Tribe. Specifically, 23.60A.154.C requires: <i>If any archaeological resources are uncovered during the proposed work, work shall be stopped immediately, and the applicant shall notify the City, affected tribes, and the Washington State Department of Archeology and Historic Preservation. The applicant shall submit a site inspection and evaluation report by a qualified professional archaeologist, approved by the City, that identifies all possible valuable archaeological data and makes recommendations on how to handle the data properly. When the report is prepared, the applicant shall notify affected tribes and the Washington State Department of Archaeology and Historic Preservation and provide them with copies of the report.</i>

Number	Comment Summary	Response
		<p>Also see language added to Sections 3.1.3 Soils/Geology, 3.5.3 Contamination, and 3.11.3 Historic, Archaeological, & Cultural Resources under Other Potential Mitigation Measures to address providing access and notification of earthwork to appropriate stakeholders.</p>
1-6	<p>EIS should address remediation of existing contaminated properties, especially in the context of equity and environmental justice.</p>	<p>Clean-up at existing contaminated properties is ongoing such as the Lower Duwamish Waterway Superfund site by the Lower Duwamish Waterway Group. The Duwamish River Community Coalition (DRCC) was established in 2001 to help monitor cleanup of the river as described in Section 3.9.1.</p> <p>For contaminated sites with current industrial land use designations that maintain an industrial focus under new land use designations, cleanup will not likely happen until redevelopment occurs, or there is a property sale that triggers site characterization and remediation activities in order to secure project financing. This is clarified in Section 3.5 of the EIS.</p> <p>Site contamination and remediation are addressed at the time of development or redevelopment through existing processes under MTCA. SEPA documentation submitted with project applications require disclosure of known or suspected contamination of soil, soil vapor, groundwater, or other media, and lenders require Phase I and/or Phase II Environmental Site Assessments be completed before they will provide project funding.</p>
1-7	<p>Sound Transit’s light rail proposals in West Seattle would result in permanent loss of Duwamish Greenbelt, an environmental asset and equity issue for the Tribe and Pigeon Point community. Request for Sound Transit to examine other light rail routes to avoid loss of greenspace and to consider the equity impacts.</p>	<p>The comment is noted and forwarded to City decision makers. The Sound Transit EIS is a different proposal from the Industrial Maritime Strategy. City staff are coordinating information and data from Sound Transit to the greatest extent possible. Sound Transit’s West Seattle and Ballard Link Extension Draft EIS proposes three Duwamish Segment Alternatives—the North Crossing Alternative (DUW-2) would avoid any construction impacts to the West Duwamish Greenway. Sound Transit will mitigate impacts to greenspaces according to applicable regulations and permit conditions. The alternatives in the Industrial and Maritime EIS do not directly affect the greenspaces.</p>
2	Cotten	Washington State Department of Transportation
2-1	<p>Appreciate the opportunity to comment on the EIS and the positive and collaborative relationship between WSDOT and the City.</p>	<p>Thank you for your letter. The comment is noted and forwarded to City decision makers.</p>
2-2	<p>Draft EIS uses old traffic data. WSDOT requests that impact of SR 99 tolling and Alaska Way Tunnel be reflected in trip pattern analysis.</p>	<p>The commenter correctly notes that the citywide travel time data available for this project includes a period before tolling began in the SR 99 tunnel. While the existing conditions patterns may differ to a degree, all future year analyses assume SR 99 tolling is in place. Because the traffic patterns used to evaluate impacts reflect post-toll patterns, the comparisons among the future year alternatives adequately represent the relative differences among the alternatives.</p>
2-3	<p>WSDOT requests additional specific measures to manage travel demand and supplement transit under alternatives 3 and 4.</p>	<p>The EIS includes a Mitigation Measures section including potential travel demand management (TDM) strategies for the study area. Among those strategies are last-mile shuttle systems between key transit nodes and the MICs; coordination with King County Metro and/or Sound Transit to provide off-peak transit service tailored to shift workers with irregular hours; subsidized vanpools; rideshare matching to limit the number of drive-alone commute trips; and</p>

Ch.4 Comments & Responses ■ Individual Responses to Comments

Number	Comment Summary	Response
2-4	<p>(1) WSDOT should be engaged for mitigation strategies for impacts to I-5 under alternatives 3 and 4.</p> <p>(2) SR 99, 509, and 599 should be investigated for transportation impacts. For vehicular trip thresholds, please see WSDOT Design Manual Chapter 1130.09(2)(a).</p>	<p>micromobility options such as scooters or bicycles to make last-mile connections.</p> <p>(1) The City is committed to working with WSDOT through a variety of means, including the I-5 System Partnership, to consider the future needs for this critical regional corridor. The Preferred Alternative proposes growth more similar to Alternative 2 and would not exceed the City's non-project threshold of impacts like alternatives 3 and 4.</p> <p>(2) In addition to the projected conditions on SR 99 through the study areas, information related to projected conditions on SR 509 and SR 599 has been included in the Final EIS. The Preferred Alternative proposes growth more similar to Alternative 2 and would not exceed the City's non-project threshold of impacts like alternatives 3 and 4. With respect to the vehicular trip thresholds cited, the City is committed to working with WSDOT to determine how that impact threshold may be incorporated into the individual project review process to determine impacts to the state highway system of any specific development proposal.</p>
2-5	<p>All alternatives would rezone Corson Facility (6413 Corson Ave S) to UI. Concerned about facility becoming nonconforming, and potential for residential development to encroach into industrial lands and inhibit its functionality. Request for an evaluation of micro-mobility and freight conflicts.</p>	<p>Nonconforming uses are permitted to continue subject to provisions of the Seattle Land Use Regulations (SMC Subtitle III). See Response to Common Comment Theme at Section 4.2.2.</p> <p>Additional clarification were added to Sections 3.2.2 and 3.6.2 to indicate that areas of Georgetown, around or near the Corson facility, slated for additional growth in housing of all types may be subject to increased air and noise impacts from vehicle traffic and industrial sources.</p> <p>The EIS includes discussion of potential modal conflicts between freight trucks and vulnerable users including people walking, biking, and using micromobility modes such as scooters.</p>
2-6	<p>Appreciate the opportunity to comment on the EIS and the positive and collaborative relationship between WSDOT and the City.</p>	<p>The comment is noted and forwarded to City decisionmakers.</p>
3	Curtis	<p>Washington State Major League Baseball Stadium Public Facilities District (PFD), Washington State Public Stadium Authority (PSA)</p>
3-1	<p>Appreciate the opportunity to comment on the EIS. Summary of comments below.</p>	<p>Thank you for your letter. Comment is noted. See the response to comments 3-2 through 3-23 below.</p>
3-2	<p>Request that the Stadium Transition Area Overlay District (STAO) be removed from the Duwamish MIC, and for the Final EIS to study the impacts of removing the STAO from the Duwamish MIC as a separate alternative.</p>	<p>The Preferred Alternative includes expanded flexibilities to address unique conditions of the stadium area through the Stadium Transition Area Overlay District. More information on these flexibilities is provided in the development standards appendix. The City's proposed action intentionally limits removal of land from MICs to focused locations in the Georgetown and South Park neighborhoods.</p>
3-3	<p>Final EIS should analyze impacts in the STAO (distinct from the balance of SODO) related to transportation, housing, and land use.</p>	<p>The STAO is part of the evaluation of the MIC in transportation, housing, and land use. This EIS provides a non-project level of detail that is areawide, consistent with WAC 197-11-442.</p> <p>Alternatives' effects on transportation corridors in and near the STAO are included; and the area is referenced in the land use evaluation and included on maps. The STAO boundaries are added to the Preferred Alternative map to assist in viewing that portion of the study area. The industry-supportive housing that</p>

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		would be located in the STAOD is evaluated for each alternative including effects on transportation, housing, and land use.
3-4	Final EIS should analyze the traffic impacts from the office and commercial uses under the No Action Alternative in comparison to other alternatives.	The land use of each alternative is compared in the EIS and included in transportation modeling and results on transportation networks inside and outside the STAOD are addressed at a non-project level of detail.
3-5	Final EIS should address transportation impacts from residential uses being allowed in the new UI Zone.	The land use of each alternative is compared in the EIS including effects on transportation networks inside and outside the STAOD at an areawide level of detail consistent with a non-project EIS. This includes considering the effect of housing. In general, where housing is part of mixed uses in proximity to jobs and other destinations there are fewer trips.
3-6	Final EIS should evaluate the marginal impact of adding residential uses to the STAOD, compared to office/commercial under the No Action Alternative.	See alternatives 3 and 4 and the Preferred Alternative that add more residential into the Greater Duwamish MIC with including in the STAOD.
3-7	Final EIS should evaluate an alternative that includes more housing near the stadiums.	Consistent with the PSRC criteria for designating MICs to focus industrial uses in the MIC, the EIS does not study allowing residential uses in the majority of the study area. Alternatives 3 and 4 and the Preferred Alternative consider limited additional flexibility of existing allowances for caretakers' units and artist/studio quarters in the proposed UI zone, and the Preferred Alternative allows some housing in the UI zone as a conditional use.
3-8	Final EIS should include an alternative that eliminates the concept of limiting occupancy of housing and instead concentrates housing in the STAOD. Consider Heartland's analysis of the economic feasibility of the City's proposed development prototypes.	<p>The comment is noted and forwarded to City decision makers. Consistent with the PSRC criteria for designating MICs to focus industrial uses in the MIC, the EIS does not study allowing residential uses in the majority of the study area. Alternatives 3 and 4 consider limited additional flexibility of existing allowances for caretakers' units and artist/studio quarters in the proposed UI zone only. Within the UI zone, the Preferred Alternative would allow some expanded housing as a conditional use, and would present the option of providing housing at an affordability level instead of limiting the occupancy.</p> <p>SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). Separate from the EIS, the City will consider economic feasibility; see Section 4.2.1.</p>
3-9	The City should eliminate the concept of tenant restrictions for housing and should analyze the impacts of a reasonable alternative in the Final EIS.	See response to comment 3-8.
3-10	City should increase the housing density limits in the STAOD to 200-220 DU/Acre and or a FAR of 4.25-4.75, and the results of that should be evaluated in the Final EIS.	Comment is noted and forwarded to City decision makers. See response to comment 3-8.
3-11	Final EIS should evaluate an alternative that applies the MFTE program to the STAOD.	Comment is noted and forwarded to City decision makers. Application of the MFTE program is noted in the development standards Appendix G regarding the Preferred Alternative.
3-12	Final EIS should evaluate an alternative that allows for 5 floors of residential in a mid-rise development, with the first 25' reserved for	See response to comment 3-8.

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	industrial/maker spaces (as studied by Heartland).	
3-13	Land cost, commercial and residential rental assumptions, capitalization rates, financing considerations, parking, construction costs, and timing considerations should be corrected in the Final EIS.	SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). The data points suggested in the comment are not a part of the EIS. Separate from the EIS, the City will consider economic feasibility; see Section 4.2.1 .
3-14	Request for the City to study an alternative that eliminates the citywide limit on residential units in industrial lands.	The comment is noted and forwarded to City decision makers. Consistent with the PSRC criteria for designating MICs to focus industrial uses in the MIC, the EIS does not study allowing significantly expanded residential uses in the majority of the study area. See response to comment 3-8. For the Preferred Alternative, two new areas outside the MICs in west Ballard and Judkins Park would be converted to mixed use zoning allowing housing, in addition to the proposed mixed-use areas in Georgetown and South Park. Overall, a total amount of housing production under alternatives 3, 4 and the Preferred Alternative would exceed housing production under No Action, but much of it would be outside of MICs, or in targeted locations selected to reduce conflicts.
3-15	Final EIS should evaluate an alternative where the height limit is capped at 85' (instead of 75') in the proposed UI Zone.	The proposed UI zone has height limit tiers of 45', 60' and 75'; however, under the Preferred Alternative the UI zone in the STAOD would be increased to 85'. See development standards Appendix G .
3-16	The 500' residential restriction from railroads should be lifted in the STAOD.	A 500' buffer requirement to housing from railroads would not apply in the STAOD under the Preferred Alternative. See development standards Appendix G .
3-17	Specific Comprehensive Plan goals should be developed for the STAOD if the STAOD is not removed from the Duwamish MIC.	The comment is noted. The studied alternatives retain the STAOD in the MIC. Policy intent can be clarified in the municipal code regarding the STAOD.
3-18	Final EIS should delineate what industrial/manufacturing/maritime uses are being referred to in the STAOD.	The expanded development standards Appendix G includes a table clarifying which specific land uses would qualify as industrial in the proposed zones.
3-19	Final EIS should explain its rationale for applying the II zone to WOSCA.	The alternatives in the EIS consider a range of different future zoning designations for the WOSCA site. A proposed comprehensive plan policy calls for site specific master planning of the site before its reuse.
3-20	Final EIS should demonstrate how its proposals and alternatives will impact the development around stadium station.	The EIS considers the programmatic level environmental impacts in all portions of the study area. Sub area analysis and localized potential impacts are discussed to practical and feasible extents; non-project EISs are areawide and not site specific in nature per WAC 197-11-442.
3-21	City should clarify how the requirement for new housing's connection to industrial activity is a mitigation measure for noise and other impacts in alternatives 3 and 4.	The occupancy limitation of housing to industry-supportive housing under alternatives 3 and 4 would mitigate impacts because occupants of the housing would be more accustomed to an industrial context than the general residential population. This mitigates the potential for noise complaints and other compatibility impacts because the residents would be less likely to levy complaints against nearby industrial operations, lessening the potential for disruption to industrial activities. With new housing occupants having a connection to industrial activity in the area, reduced traffic and VMT would also reduce noise associated with

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		venies and associated impacts. Similar mitigation would result for housing provided under the affordable workforce option (Preferred Alternative) because occupants of the affordable housing would be more likely to be people holding nearby jobs in MICs.
3-22	Final EIS should explain how new open and green space would be funded/delivered in alternatives 3 and 4.	SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450); see Section 4.2.1 . The City's Parks, Recreation and Open Space Plan outlines the City's existing open space and recreational facilities, capital funding, and projects being funded and a vision for the future.
3-23	Final EIS should clarify how the new subarea plans would be conducted and what that process would entail.	The City will be working with stakeholders in the Duwamish MIC and the BINMIC to update their respective Centers Plans in 2023 and 2024.
4	Felleman	Port of Seattle The Northwest Seaport Alliance
4-1	Support Alternative 2. Reviewed the Draft EIS under the goal to support the next generation of industrial and maritime jobs and centered feedback on that principle (as opposed to trying to address the regional housing affordability crisis). Comments will be augmented by a technical appendix with comments from subject matter experts across the Port and NWSA.	Thank you for your letter. The comment is noted and forwarded to City decision makers.
4-2	The equity of economic opportunity afforded by the industrial and maritime employment mix is the central reason to preserve industrial lands.	The comment is noted and is acknowledged in Section 1.3.1 and Section 2.2.1 . The EIS recognizes equity and accessibility as one of the six key emerging factors affecting Seattle's MICs, specifically access to maritime and other industrial career opportunities for BIPOC and women. Maintaining a strong industrial economy is a prerequisite to providing these opportunities, but other strategies including outreach to BIPOC youth and workforce training investments are key parts of the Industry and Maritime Strategy.
4-3	Port of Seattle has devoted substantial time and investment to addressing environmental justice issues in near-port communities. Concerned that alternatives 3 and 4 do not adequately mitigate the impacts of locating new residential communities near the industrially-zoned MICs.	Consistent with the PSRC criteria for designating MICs to focus industrial uses in the MIC, the EIS Alternatives do not study allowing significantly expanded residential uses in the majority of the study area. For alternatives, 3, 4 and the Preferred Alternative, overall, a higher total amount of housing production would result compared to No Action, and much of it would be outside of MICs, or in targeted locations selected to reduce conflicts. In addition to limiting the amount and location of housing and updating zoning standards per Land Use Mitigation Measures in Section 3.8.3 , other measures addressing compatibility include those designed to address noise and air pollution. See Sections 3.2.3 and 3.6.3 .
4-4	Request additional detail on the cost of mitigation requirements in alternatives 3 and 4.	SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). See response to comment themes at Section 4.2.1 .
4-5	Freight routes and regional transportation planning must be a central focus (regional importance of freight mobility).	The Final EIS has been reorganized to include freight as a separate section together with additional information. It should also be noted that study corridors were selected based on the City's Major Truck Streets designation and include most Major Truck Streets within each study area. While freight mobility is critical in these areas, the EIS is intended to address all travel modes.

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		A section on the PSRC Regional Centers Framework and Plan Review Manual has been added to the Current Policy & Regulatory Frameworks portion of Section 3.10 Transportation .
4-6	Would like to see the Final EIS acknowledge that industrial workers' needs for affordable housing does not mean that housing should be within or adjacent to the MICs.	Comment is noted. Section 3.9 Housing discusses the balance of housing and jobs. The EIS discusses the impacts and effects of including housing in MICs in differing quantities and patterns, including no expansion of housing allowances, under the different alternatives. The EIS Alternatives focus on industrial uses and would not significantly expand residential uses in the majority of the study area. Caretakers' quarters and artist/live-work units are meant to provide industry supportive housing. Some alternatives would adjust some locations for mixed use housing that would either be outside of MICs, or in targeted locations selected to reduce conflicts.
4-7	Concerned the EIS is not easily accessible to the public and relies on technical jargon.	Comment is noted. The City prepared executive summaries and a story map in addition to EIS documents and provided presentations and meetings to interested groups. Translations of summaries were provided.
4-8	Please replace the photo on page 1-10 with an image of Seattle container operations (photo is of the East Blair Roll on Roll Off terminal at the Port of Tacoma).	The photo was replaced in this Final EIS with an image of Seattle container operations.
4-9	Recommend the EIS consider alignment with Port/NWSA development plans.	The EIS includes alignment with Port/NWSA development plans to the extent practical and feasible.
4-10	Recommend including data that confirms industrial workforce demand for housing in the MICs. Please replace the photo on page 1-17 with an image of Seattle container operations (photo is of the Husky Container Terminal at the Port of Tacoma).	Comment is noted. Currently housing is not a permitted use in the MICs and the City does not have data demonstrating the level of demand for workforce housing in the MICs. See response to comment 4-6 regarding the limited housing in the EIS alternatives. The photo was replaced in this Final EIS with an image of Seattle container operations.
4-11	Recommend including description of allowable development types under current zoning in Exhibit 1.5-5.	See adjustments in Section 1.5.5 to add allowable development types. See also Industrial Development Regulations appendix that summarizes development allowed under existing zoning designations.
4-12	Recommend including description of allowable development types under current zoning in Section 1.5.5. Please replace the photo on page 1-21 with an image of workers at Seattle facilities (photo is of the Pierce County Terminal at the Port of Tacoma).	See response to comment 4-11. The photo was replaced in this Final EIS with an image of workers at Seattle facilities.
4-13	Inclusion of Northwest Ports Clean Air Strategy and distinction between those investments and mitigation for the revised zoning as presented in the Plan	Additional language has been added to Section 1.7.2 to add detail on the Northwest Ports Clean Air Strategy, and to distinguish between mitigation currently planned by the Port of Seattle for Port operations from mitigation proposed for implementation of the Industrial and Maritime Strategy.
4-14	Support Alternative 2.	Comment is noted and forwarded to City decision makers.

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4-15	Amend Draft EIS to reflect that Terminal 46 is a facility licensed to the NWSA for container cargo use and will not become a cruise terminal. Specific text edits recommended.	See revisions made to text in Section 2.2.1 (page 2-8) to reflect that a prior effort to convert the terminal to a cruise terminal has been abandoned.
4-16	Light rail/HCT: Ensure the Final EIS provides contingency concepts in the case of delayed development past 2037-39 of the Interbay and Ballard stations, and potential for alternative station sites, and that the Final EIS considers a similar analysis in the SODO area in case an interim terminus occurs at SODO/Lander.	The City is considering the most updated and recent information provided regarding light rail timing and planning as provided by Sound Transit. The City periodically reviews its growth and policies and adjustments are possible when appropriate.
4-17	Support the MML and II land use concepts. Recommend acknowledgment of incompatible uses in the UI zone.	Comment is noted and forwarded to City decision makers. The land use chapter evaluates potential land use compatibility impacts under all alternatives.
4-18	Request the inclusion of cost estimates for each mitigation measure identified in Chapter 3 and dispute the inclusion of mitigation measures that are already underway. Request expanded truck charging facilities (in Section 3.2 Air Quality & GHG) not be considered a mitigation measure under alternatives 3 and 4.	SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). See response to comment themes Section 4.2.1 . Per SEPA, mitigation measures may include measures that could be implemented or might be required as well as those the City is committed to implement. If the technical feasibility or economic practicality of mitigation measures is uncertain, the mitigation measure may still be discussed but discussion of the uncertainties should be included. See WAC 197-11-440 and WAC 197-11-660. Additional language has been added to Section 3.2.1 to identify mitigation currently planned by the Port of Seattle for Port operations as not mitigation proposed for implementation of the Industrial and Maritime Strategy. Specific language was also deleted in Section 3.2.3 to add similar clarity.
4-19	Summary of air quality monitoring; description of current drayage trucking and conversion to newer truck models; and Northwest Seaport Alliance (NWSA) participation in the Northwest Ports Clean Air Strategy.	Exhibit 3.2-6 provides a summary of the detected pollutants and measured concentration levels for the eight sites monitored in 2021 for this EIS. Appendix H presents the Technical Memo, Summary of Air Quality and Noise Monitoring Results at 8 Locations Within The City of Seattle. The document presents a summary of air constituents monitored at those sites and what methodology was used in that monitoring. Text has been changed in Air Quality & GHG Section 3.2.1 to reflect drayage trucking as an unknown portion of all trucking in the MICs; added data and reporting from the NWSA's Clean Truck Program; and added clarifying language to indicate that the NWSA is a member of the Northwest Ports Clean Air Strategy.
4-20	Incorrect reference to Terminal 15; inclusion of funding along with policy guidance for industrial and maritime electrification	Draft EIS Section 3.2.3 reference to Terminal 15 was corrected to Terminal 5. Additional text has been added to Section 3.2.3 to include funding as a possible addition to the Seattle Comprehensive Plan and MIC Subarea Plans to support electrification of industrial and maritime activities. See Section 3.2 Air Quality & GHG .
4-21	Water Resources Impacts: Port/NWSA staff agree with the analysis; because Seattle's updated stormwater code will drive improvements to stormwater quality under all alternatives that involve re-development.	Comment is noted.

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4-22	Discussion should state that the City will adhere to PSRC's methodology for distinguishing industrial from non-industrial jobs.	Industrial employment estimates are based on the 2019 share of industrial employment by sector based on the 2015 PSRC Industrial Lands Study NAICs-based definition of industrial activities. This uses classification of what counts as an industrial job are consistent with PSRC criteria, including jobs in Information Computer Technology (ICT). Projections show strong job growth in ICT under the Action Alternatives. Consistency with PSRC classifications is appropriate given the need to fit VISION 2050 and Regional Centers Framework. A more conservative classification of which jobs are industrial, especially in ICT would show a steeper decline in the percent of industrial jobs under most studied alternatives. See footnote in Section 2.4.8 of the Final EIS.
4-23	Request that the EIS include a report on how much more housing can be put into the residential zones before it contemplates adding housing to industrial zones.	The comments are noted and forwarded to City decision makers. The 2021 King County Urban Growth Capacity Report determines the amount of land suitable for urban development, and evaluates the capacity for growth, based upon measurement of recent actual development activity. The City of Seattle's residential land supply and capacity is quantified on page 104 of that report. ²⁹
4-24	<p>(1) Final EIS transportation section should be substantially reworked to prioritize freight mobility consistent with the goals of the EIS.</p> <p>(2) Draft EIS should acknowledge role of essential facilities in the transportation system of the Duwamish MIC (marine containers, breakbulk facilities, and major rail yards for freight transfer).</p> <p>(3) Draft EIS should provide information on the impacts of alternatives on the freight system. The analysis should include Major Truck Streets, NHS Freight Intermodal Connectors, Critical Urban Freight Network, and Heavy Haul Network. Draft EIS should include map of City's truck network from City's Freight Master Plan.</p> <p>(4) Draft EIS should reflect City's Complete Streets Ordinance that prioritizes freight on the Major Truck Streets.</p> <p>(5) Final EIS should align with requirements for the MICs Subarea Plans to "Prioritize transportation projects that provide access to freight intermodal facilities to optimize freight movement for local, regional, and national distribution (including rail, trucking facilities, or waterways, as appropriate)."</p>	<p>(1) The Final EIS has been reorganized to include freight as a separate section together with additional information. It should also be noted that study corridors were selected based on the City's Major Truck Streets designation and include most Major Truck Streets within each study area. While freight mobility is critical in these areas, the EIS is intended to address all travel modes.</p> <p>(2) The recommended text has been added to the Primary and Secondary Study Areas introduction.</p> <p>(3) Draft EIS Exhibit 3.10-13 Existing Freight Network provides additional data displaying more elements of the freight system and the Final EIS has been reorganized to include freight as a separate section.</p> <p>(4) The recommended text has been added to the Complete Streets Ordinance summary in the Current Policy & Regulatory Frameworks portion of Section 3.10 Transportation.</p> <p>(5) The EIS evaluates the proposals and alternatives regarding regional plans and policies in Section 3.8 Land & Shoreline Use. The City will prepare a subarea plan for each Manufacturing Industrial Center and will address Centers requirements and the PSRC regional growth strategy.</p>
4-25	<p>(1) Final EIS transportation section should reference the Seattle Industrial Areas Freight Access Project, including the provided data and strategies.</p> <p>(2) Unclear whether maps (which are missing the legend for the corridors under analysis) cover all major freight corridors. WSDOT's FGTS</p>	<p>(1) Information from the Seattle Industrial Areas Freight Access Project has been added to the Freight section of the Final EIS.</p> <p>(2) The commenter states that maps are missing legends, but no exhibit number is cited. Study corridor Exhibit 3.10-3 and Exhibit 3.10-4 include legends in the Draft and Final EIS; text descriptions of the study corridors are included in Draft EIS Exhibit 3.10-14 (Final EIS Exhibit 3.10-8), as well as the travel time results table for each</p>

²⁹ See King County Urban Growth Capacity Report, 2021, available: <https://kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/UGC/KC-UGC-Final-Report-2021-Ratified.ashx?la=en>.

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	<p>data should be reviewed to identify these corridors.</p> <p>(3) Final EIS should include analysis of travel time reliability for freight.</p> <p>(4) Final EIS should include east-west screenlines in Duwamish MIC.</p>	<p>alternative in the impacts section. Draft EIS Exhibit 3.10-13 Existing Freight Network has been provided with additional data so the reader can compare with the study corridors (see Final EIS Exhibit 3.10-11 through Exhibit 3.10-14). Study corridors were selected based on the City's Major Truck Streets designation and include most Major Truck Streets within each study area.</p> <p>(3) Language has been added to Section 3.10.2 Impacts to note the relationship between traffic congestion and reliability, i.e., that increasing traffic congestion results in deteriorating reliability. The importance of this issues for freight operators is also reflected in the Final EIS.</p> <p>(4) The studied screenlines are consistent with those designated in the Seattle comprehensive plan and include two screenlines capturing east-west traffic across the Duwamish River: 3.11 Duwamish River—West Seattle Bridge and Spokane Street and 3.12 Duwamish River—1st Avenue S and 16th Avenue S. East of the Duwamish River, the study corridors used for analysis include seven east-west corridors in the Duwamish MIC.</p>
4-26	<p>(1) Add provided paragraph to section on the Freight Master Plan.</p> <p>(2) The CIP section should focus on the types of projects that are relevant for access to and movement within the MICs, including all phases of the East Marginal Way Rehabilitation project and West Seattle bridge projects.</p> <p>(3) Final EIS include information from PSRC's Regional Centers Framework and Plan Review Manual that provide detailed guidance on the importance for MIC plan development including prioritizing freight projects.</p>	<p>(1) The description of the Freight Master Plan has been provided with additional information from the commenter.</p> <p>(2) Additional projects from the CIP have been added to the summary section per the commenter's suggestion.</p> <p>(3) A section on the PSRC Regional Centers Framework and Plan Review Manual has been added to the Current Policy & Regulatory Frameworks portion of Section 3.10 Transportation.</p>
4-27	<p>(1) Existing Conditions section should have a separate freight section presented first.</p> <p>(2) Freight Network map should add: presence of major marine and rail intermodal cargo facilities in the Duwamish; hierarchy of truck streets; and information on NHS Freight Intermodal Connectors and Critical Urban Freight Corridors.</p> <p>(3) Final EIS should analyze the impacts of different alternatives in the MICS using AM conditions.</p> <p>(4) Expand the identification of truck streets with heavy truck volumes to other corridors, especially Atlantic and SW Spokane St. Maybe add map of the FGTS system.</p> <p>(5) Final EIS should add section on truck parking, both its availability and community impact</p>	<p>(1) The Final EIS has been reorganized to include freight as a separate section with additional information.</p> <p>(2) Draft EIS Exhibit 3.10-13 Existing Freight Network has been provided with additional data displaying more elements of the freight system. See Final EIS Exhibit 3.10-11 through Exhibit 3.10-14.</p> <p>(3) While peak hours vary to some degree by individual roadway, the PM peak hour is typically the most congested period. To confirm that approach, an observed travel time dataset for Seattle was reviewed and it was determined that 4:45-5:45pm represented the peak hour of travel in Seattle during the day. Therefore, the PM peak hour as selected for this EIS analysis to be conservative in identifying potential impacts.</p> <p>As stated in the Draft EIS on page 3-370, the AM peak hour is typically expected to have similar characteristics in the opposite direction than those shown for the PM peak hour. Therefore, the same locations that are identified as having traffic congestion during the PM peak hour would likely have traffic congestion during the AM peak hour.</p> <p>(4) Exhibit 3.10-13 Existing Freight Network has been provided with additional data so the reader can compare with the study corridors (see Final EIS Exhibit 3.10-11 through Exhibit 3.10-14). Study corridors were selected based on the City's Major Truck Streets designation with the goal of analyzing those facilities most likely to</p>

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		<p>be impacted by the alternatives. The study corridors include most Major Truck Streets within each study area.</p> <p>(5) Language has been added to the Final EIS to more fully address truck parking needs in Sections 3.10.1 Affected Environment, 3.10.2 Impacts, and 3.10.3 Mitigation Measures.</p>
4-28	<p>Final EIS should describe how adding additional residential uses, potentially with commuter trip to the industrial areas, can be accommodated, given the scant resources to increase transit capacity.</p>	<p>The EIS includes an analysis of transit demand relative to capacity for each future year alternative. Based on that analysis, the EIS concludes that one screenline (across 8th Avenue NW east of the BINMIC) would be impacted by Alternative 1 No Action. For the action alternatives, while some routes traveling across the study area screenlines may operate over their crowding threshold for some individual trips, overall planned capacity is expected to adequately accommodate increasing demand relative to Alternative 1 No Action.</p>
4-29	<p>Concerned that the increased safety conflict between trucks and bike/peds will lead away from the City's Vision Zero goal to eliminate traffic fatalities.</p>	<p>The City is committed to ending deaths and serious injuries caused by traffic collisions. This commitment is reflected in the Vision Zero policy which is supported by a variety of strategies as described in the EIS. The EIS includes a Mitigation Measures section dedicated to Pedestrian & Bicycle System Improvements including the City's safety programs. However, the City also acknowledges that significant impacts to active transportation and safety may remain due to the projected increase in people walking and biking in areas with network gaps and the increased potential for vehicle conflicts (particularly trucks) with vulnerable users. While the City can pursue a variety of mitigation measures to improve 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.</p>
4-30	<p>(1) Concerned about the use of "PSRC's Transit model" for this MIC-focused analysis. How does the PSRC Transit model account for truck trips on the system, and how are they classified?</p> <p>(2) Draft EIS should have a description of the rationale for choosing the criteria and thresholds of significance.</p> <p>(3) Critical freight corridors must be included for the LOS and travel time analysis, and should take into account the volume of freight moving along the corridor.</p> <p>(4) Travel time reliability should be analyzed for freight.</p> <p>(5) The Final EIS should take a similar approach to SDOT's Complete Corridors approach for transit to prioritize major truck streets and adjust the active transportation metric accordingly.</p>	<p>(1) The project team used a version of the PSRC regional trip-based travel demand model that was customized for Sound Transit's West Seattle to Ballard Link Extensions (WSBLE) environmental review and documentation. The model estimates the demand for person and freight travel across a range of travel modes: private automobiles, trucks, transit vehicles, walking, and biking. The truck model defines a truck based on relative weight classes and separates medium and heavy trucks based on the definitions used by WSDOT for collecting truck counts:</p> <ul style="list-style-type: none"> ▪ Medium trucks are defined as single unit, six or more tires, two to four axles and 16,000 to 52,000 lbs. gross vehicle weight ▪ Heavy trucks are defined as double or triple unit, combinations, five or more axles, and greater than 52,000 lbs. gross vehicle weight <p>(2) The criteria used to evaluate impacts is described in the Data & Methods section including explanations regarding sources such as the Highway Capacity Manual, <i>Seattle 2035</i> Comprehensive Plan, and King County Metro Strategic Plan Service Guidelines. Additional explanation regarding the thresholds of significance used to compare the No Action Alternative and action alternatives has been added to the Thresholds of Significance section of the Final EIS.</p> <p>(3) Exhibit 3.10-13 Existing Freight Network has been provided with additional data so the reader can compare with the study corridors (see Final EIS Exhibit 3.10-11 through Exhibit 3.10-14). Study corridors were selected based on the City's Major Truck Streets</p>

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		<p>designation and include most major truck streets within each study area.</p> <p>(4) See response to comment 4-25, part 3.</p> <p>(5) The City will apply its Streets Illustrated design manual and Complete Streets approach to corridors in the study area. If new zoning designations are adopted, SDCI will work with SDOT to develop updates to the Streets Illustrated manual reflecting street design standards tailored to the industrial context and level of expected pedestrian and bicycle activity. Updates will consider street typologies and design standards that can accommodate both freight activity and non-motorized uses with a focus on reducing potential conflicts.</p>
4-31	<p>(1) Add separate section on freight impacts to the “impacts common to all alternatives” section. In same section, potentially add opportunities for providing on-street truck parking.</p> <p>(2) Final EIS should evaluate degree to which different alternatives increase the potential for conflict for trucks and non-motorized users, and whether they can be mitigated without negative impacts to freight mobility.</p> <p>(3) Final EIS should describe how the existing poor Pavement Condition Index ratings stemming from a lack of maintenance in light of existing gas taxes and license fees, would impact future development alternatives or be mitigated.</p>	<p>(1) The Final EIS has been reorganized to include freight as a separate section, including in the Impacts Common to All Alternatives section. This section will address on-street truck parking.</p> <p>(2) See response to comment 11-17.</p> <p>(3) The Draft EIS addresses potential effects on pavement condition on page 3-388 and concludes that the action alternatives may cause some impact though it is not expected to rise to a level of significance in comparison to Alternative 1 No Action.</p>
4-32	<p>For all alternatives:</p> <p>(1) Add a freight impact section to the top of the analysis</p> <p>(2) Carry out the analysis for the AM peak</p> <p>(3) Include all critical truck corridors in the analysis</p> <p>(4) Incorporate the increase in truck traffic into the analysis</p> <p>(5) Add east-west screenline in Duwamish</p> <p>(6) Add at-grade rail crossing safety to safety criterion</p>	<p>(1) The Final EIS has been reorganized to include freight as a separate section, including in the Impacts sections.</p> <p>(2) See response to comment 4-27, part 3.</p> <p>(3) See response to comment 4-27, part 4.</p> <p>(4) See response to comment 4-30, part 1.</p> <p>(5) See response to comment 4-25, part 4.</p> <p>(6) A discussion of potential effects on safety related to at-grade rail crossings has been added to the Final EIS.</p>
4-33	<p>(1) Very concerned about mitigation for I-5 travel time impact and the suggestion to reduce jobs in SODO.</p> <p>(2) Draft EIS does not account for traffic diversion that occurs on many corridors at LOS F; adding residential traffic to major truck streets does not support a growing industrial area.</p> <p>(3) Greater growth in alternatives 3 and 4 causes significant impacts to vehicle movement and travel time. Vehicles, buses, and trucks will get stuck in this congestion.</p>	<p>(1) All alternatives increase jobs in SODO including Alternatives 2, 3, and 4 and the Preferred Alternative. However, recognizing impacts of the highest increased job levels under alternatives 3 and 4, the Draft EIS included a mitigation measure to address job levels closer to Alternative 2. Due to factors described in Chapter 2, the Preferred Alternative features a lower amount of job growth than alternatives 3 and 4. Job growth under the Preferred Alternative is similar to alternatives 2.</p> <p>(2) The PSRC regional travel demand model that was used for this project covers the four-county region (King, Snohomish, Pierce, and Kitsap) and forecasts travel demand throughout the day. Therefore, the model reflects diversion to other facilities or time periods when capacity is reached.</p>

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		(3) The commenter's concerns about the vehicle movement and travel time impact findings of the Draft EIS are noted.
4-34	<p>(1) Impacts of No Action alternative indicate the need for additional capacity to support the MICs; the City should pay greater attention to the MICs to ensure continued support and economic/job growth goals.</p> <p>(2) Alternative analysis sections should provide more information on active transportation, freight, or safety.</p>	<p>(1) The commenter's concern about infrastructure needs under the No Action Alternative (i.e., current policies) is noted. SDOT is currently in the process of developing the Seattle Transportation Plan which will integrate the City's modal plans into a comprehensive vision for the citywide transportation network centered around the following values and goals: equity, safety, mobility, sustainability, livability, and excellence.</p> <p>(2) Dedicated freight sections have been added to the Final EIS. With respect to active transportation and safety, see response to comment 11-17.</p>
4-35	<p>(1) Add provided introduction to transportation mitigation measures section.</p> <p>(2) The City, Port of Seattle, and NWSA will need to collaborate to ensure that public funds are available to mitigate any negative freight impacts, since the development standards in this section provide no direct benefits to freight mobility, parking, or delivery.</p> <p>(3) Jobs in MIC would not exist without an efficient and reliable freight system.</p> <p>(4) Add a section for freight mitigation in this section.</p>	<p>(1) Language has been added to the Mitigation Measures introduction to explicitly acknowledge freight mobility needs in the MICs.</p> <p>(2) The City is committed to continuing its partnership with the Port of Seattle and NWSA to implement freight mobility improvements.</p> <p>(3) The commenter's perspective about the need for an efficient and reliable freight system to support industrial jobs is noted and forwarded to City decision makers.</p> <p>(4) The Final EIS has been reorganized to include freight as a separate section, including in Section 3.10.3 Mitigation Measures.</p>
4-36	<p>(1) TSMO section should also include truck-specific notifications for incidents and major points of congestion.</p> <p>(2) Support for rules that tailor TDM requirements to those most effective in industrial settings.</p> <p>(3) Parking policies in the MIC must take the needs of workers, trucks, delivery and service vehicles, and business customers into account.</p> <p>(4) Draft EIS should list potentially significant gaps in ped/bike systems within and providing access to MICs.</p> <p>(5) Large truck parking and curb-side management is needed in parking strategies.</p> <p>(6) Final EIS should add safety subsection to mitigation section.</p> <p>(7) BIA, developer contributions, and TIFs are unlikely to address major transportation system improvement needs, let alone help reduce existing system gaps or maintenance and rehabilitation needs.</p> <p>(8) Proposed widening on Dravus Bridge has not been proposed in any funding planning, and the Ballard and Magnolia Bridges have been studied for years and are still not funded. Concerned about lack of bridge funding.</p>	<p>(1) Language has been added to Section 3.10.3 Mitigation Measures to reflect the commenter's suggestion.</p> <p>(2) The commenter's support for TDM requirements tailored to industrial settings is noted.</p> <p>(3) The commenter's perspective on parking policies supportive of workers, trucks, delivery and service vehicles, and business customers is noted.</p> <p>(4) A link has been added to the Final EIS so that readers can explore detailed data in the City's interactive GIS database within their areas of interest.</p> <p>(5) The Final EIS provides more language regarding truck parking and curb space management needs.</p> <p>(6) The Final EIS mitigation measure text is rearranged so that safety is discussed its own section rather than being nested within Pedestrian/Bike section.</p> <p>(7) The funding sources suggested in the Potential Mitigation Measure Funding section are some of the tools the City could pursue. In addition, the City has a biennial budget process through which transportation system improvements, maintenance, and rehabilitation needs are considered and funded as feasible.</p> <p>(8) The City has a biennial budget process through which transportation system improvements, maintenance, and rehabilitation needs are considered and funded as feasible. In addition to pursuing grant funding sources, the biennial budget is the process through which funding for bridge retrofit and replacement would be identified.</p> <p>(9) The commenter's perspective on transportation mitigation fees is noted and forwarded to City decision makers.</p>

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	<p>(9) Transportation mitigation fees will impact the development financial pro formas and risk the ability to fund such development.</p>	
<p>4-37</p>	<p>(1) ITS and TSMO improvements will be needed on other corridors as well as W Dravus St and I-5.</p> <p>(2) Draft EIS proposed TSMO, TDM, and ped/bike improvements to offset travel time impact and congestion; concerned that there is no effort to demonstrate how much the impacts can be mitigated, or the cost/funding to complete them.</p> <p>(3) Final EIS should address mitigation for travel time increase on I-5.</p> <p>(4) Value of freight/transit lanes should be analyzed on a case-by-case basis.</p> <p>(5) Gas tax and vehicle license fees have not been effective to date in resolving pavement issues in the Duwamish. Six years ago, the Port and City developed an intergovernmental agreement to fund the Heavy Haul Network for container drayage activity, but the funding identified has yet to be invested in new pavement.</p>	<p>(1) Comment noted. The Transportation Systems Management and Operations (TSMO) section within Section 3.10.3 Mitigation Measures lists the types of TSMO measures that could be implemented throughout the study areas.</p> <p>(2) SEPA does not require quantification of the magnitude to which each measure would mitigate impacts. This programmatic EIS addresses area-wide land use zoning changes, rather than a project-specific proposal. The proposal may result in a wide range of individual projects implemented over a long timeframe and across a large geographic area. Because the specific locations and sizes of development are unknown at this time, it would be speculative to identify specific mitigation measures. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation will be determined. The City is committed to seeking funding to implement these strategies as needed, but it would be speculative to quantify potential costs at this stage.</p> <p>(3) The City is committed to working with WSDOT through a variety of means, including the I-5 System Partnership, to consider the future needs for this critical regional corridor. Any mitigation measures would be developed in partnership with and implemented by WSDOT; there are no feasible mitigation measures within the City's sole control. See also response to comment 4-33(1).</p> <p>(4) Section 3.10.3 Mitigation Measures notes the possibility of freight/transit lanes as one potential strategy. SDOT would study any specific projects on a case by case basis to determine their benefit on a particular corridor.</p> <p>(5) The commenter's concerns about funding sources are noted. The City will continue to pursue partnerships to make improvements to the Heavy Haul Network, such as the recent Memorandum of Understanding to contribute funding to the East Marginal Way Corridor Improvement Project – North Segment. In addition, the City has a biennial budget process through which transportation system improvements, maintenance, and rehabilitation needs are considered and funded as feasible.</p>
<p>4-38</p>	<p>Final EIS should provide more detail on unavoidable adverse impacts, in particular those that affect freight mobility under alternatives 3 and 4. Scenarios detrimental to supporting maritime and industrial businesses in the MICs should not be considered. This is a major factor for preferring Alternative 2.</p>	<p>The commenter's preference for Alternative 2 due to the increased impacts to transportation/freight mobility under alternatives 3 and 4 is noted.</p> <p>This programmatic EIS evaluates proposed actions that are area-wide and programmatic in nature, rather than location-specific. Therefore, the methodologies used to evaluate potential changes and impacts to the transportation network are broad-based as is typical for the analysis of large-scale plan updates. Because the specific locations and sizes of development are unknown at this time, the location-specific impacts and mitigation projects that will be required are also unknown. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation will be determined.</p>

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4-39	Exhibits 3.14-4 and 3.15-5 appear to be missing stormwater infrastructure when compared with the Port's mapping records.	Exhibit 3.14-4 and Exhibit 3.14-5 have been updated to include private stormwater mains available in the City of Seattle mapping. See Section 3.14 Utilities .
5	Saganic	Puget Sound Clean Air Agency
5-1	Final EIS should address dust impacts from increased VMT in the study area.	Thank you for your letter. The potential health impacts of particulate matter is discussed in Pollutants of Concern in Section 3.2.1 . Additional text has been added to include fugitive roadway dust as a source of particulate matter. The potential for fugitive dust emissions associated with soil-disturbing activities, demolition and construction work, and grading are discussed in general in Section 3.2.2 , Construction Related Emissions. The potential for vehicle travel to generate PM2.5 from road dust is discussed under Transportation Related Emissions in Section 3.2.2 Impacts of Alternative 1 No Action . Discussion under Transportation Related Emissions for alternatives 2, 3, and 4 compare emissions to Alternative 1. Additional text is added in each of these sections to include the potential generation of dust associated with increased vehicle miles traveled. Additional text is added to Section 3.2.3 regarding increased street sweeping to prevent impacts from fugitive dust.
5-2	Exhibit 3.2-3.5 is unclear from what the text and figure descriptions provide. Clarification needed.	The results shown in Draft EIS Exhibit 3.2-5 and in Appendix H represent the singular 24-hour PM10 concentrations for the respective sample day and location. Each location had only one 24-hour sample collected. A note has been added to Exhibit 3.2-5 (see Section 3.2 Air Quality & GHG).
5-3	Exhibits 3.2-3.6 are unclear as to the source of the RSL. Source for each RSL should be included	RSLs provided in Draft EIS Exhibit 3.2-6 are available at EPA's Regional Screening Levels website (https://www.epa.gov/risk/regional-screening-levels-rsls). The noncarcinogenic screening levels with a target hazard quotient of 0.1 are used. A note has been added to Exhibit 3.2-6 (see Section 3.2 Air Quality & GHG).
5-4	Details and raw data from air sampling, including detection limits, should be shared publicly.	Appendix H , Technical Memo, "Summary of Air Quality and Noise Monitoring Results at 8 Locations Within the City of Seattle" has been added to the Final EIS and presents the raw data and detection limits used in that monitoring. None of the parameters had laboratory detection limits or reportable limits above the RSLs. There were two locations (SEA3 & SEA5) that had measurable concentrations above the RSL for 2-Propanol.
5-5	Incorrect reference to Tacoma attainment status for PM _{2.5} .	Additional text has been added in Section 3.2.1 to correct the reference.
5-6	Clarification of the location of denser housing in the Duwamish Valley and potential impacts associated with exposure to changes in air quality.	See Exhibit 2.4-6 , Exhibit 2.4-12 , Exhibit 2.4-18 , and Exhibit 2.4-24 for maps of the MICs and designations for proposed land use changes under each of the alternative studied in the Draft EIS (see also Exhibit 2.4-30 for a map of proposed land use changes under the Preferred Alternative). Section 3.8 Land & Shoreline Use provides descriptions of uses within proposed land use designations, including those that will accept additional and denser housing. Given the non-project nature of this EIS, Section 3.2.1 provides an appropriate level of detail on anticipated sources of pollution that existing and new residents in the study area may be exposed to. Section 3.2.2 provides an appropriate level of detail on the potential air quality impacts to those residents. Section 3.2.3

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		<p>provides an appropriate level of detail for available air quality impact mitigation options (see Section 3.2 Air Quality & GHG). Subsequent developments that may arise from the proposed land use changes in the Industrial and Maritime Strategy will be required to meet all applicable codes and regulations, and to conduct project-level SEPA review at that time, in which analysis will be conducted to assess site specific impacts and necessary mitigation measures.</p>
6	Inghram	Puget Sound Regional Council
6-1	<p>Appreciate the opportunity to comment and the City's work to develop a guiding strategy for its industrial areas. Encourage the City to be thoughtful in meeting regionally-adopted criteria so as to maintain regional designation while balancing a variety of other interests.</p>	<p>Thank you for your letter. The comment is noted and forwarded to City decision makers.</p>
6-2	<p>Cities with centers are required to adopt or update subarea plans for their MICs prior to 2025 to demonstrate consistency with the Regional Centers Framework. Encourage the City to limit housing in MICs. Suggest reviewing PSRC's Industrial Lands Analysis for consistent classification of industrial vs. non-industrial jobs.</p>	<p>As part of VISION 2050, PSRC is requiring the City to prepare updated subarea plans for the two MICs. These updates will update goals and policies consistent with this proposal and address VISION 2050 goals for Centers Plans (see also Objective M of the proposal). Consistent with the PSRC criteria for designating MICs to focus industrial uses in the MIC, the EIS does not study allowing residential uses in the majority of the study area. Alternatives 3 and 4 and the Preferred Alternative consider limited additional flexibility of existing allowances for caretakers' units and artist/studio quarters, or other criteria-limited affordable housing, in the proposed UI zone only.</p> <p>Industrial employment estimates are based on the 2019 share of industrial employment by sector based on the 2015 PSRC Industrial Lands Study NAICs-based definition of industrial activities. This uses classification of what counts as an industrial job are consistent with PSRC criteria, including jobs in Information Computer Technology (ICT). Projections show strong job growth in ICT under the Action Alternatives. Consistency with PSRC classifications is appropriate given the need to fit VISION 2050 and Regional Centers Framework. A more conservative classification of which jobs are industrial, especially in ICT would show a steeper decline in the percent of industrial jobs under most studied alternatives. See footnote in Section 2.4.8 of the Final EIS.</p>
6-3	<p>Encourage a Comprehensive Plan policy to maintain consistency with adopted regional and county criteria for manufacturing/industrial centers.</p>	<p>Comment is noted. Section 3.8 Land & Shoreline Use discusses consistency with regional and county criteria for MICs.</p>
6-4	<p>Support the addition of LU 10.3. Policy could be further improved by referencing potential updates to city-adopted subarea plans for the MICs. Once the City has adopted subarea plans for the MICs, it is reasonable to contemplate land use changes in conjunction with those subarea plan updates.</p>	<p>The City will partner with communities to update subarea plans for the two MICs by the 2025 timeline provided by PSRC. Zoning changes studied in this EIS could be implemented in stages. It is possible that some or all of the zoning changes could occur after subarea planning processes.</p>
7	Panganiban	Seattle Department of Transportation
7-1	<p>Appreciate the opportunity to comment. Interested in proposed development standards</p>	<p>Thank you for your comments. Comment is noted.</p>

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	and code language affecting ROW in the three land use concepts.	
7-2	More detailed exhibits should be shown in the Final EIS for curb ramps and sidewalk conditions in the UI and II zones where multi-modal development standards are proposed.	A link has been added to the Final EIS so that readers can explore detailed data in the City's interactive GIS database within their areas of interest.
7-3	Final EIS should consider and discuss code updates that can expand curb ramp requirements to improve access in the study area, as curb ramps are not required outside of specific development conditions currently.	Through the SDOT Americans with Disabilities Act Transition Plan for the Seattle Public Right-of-Way, the City is committed to install or remediate at least 1,250 curb ramp replacements each year. Locations within the study area will be considered through that prioritization process.
7-4	(1) Final EIS should outline how the land use code requires new development to construct pedestrian improvements. (2) New zoning designations provide an opportunity for code updates on pedestrian access and circulation requirements.	If new zoning designations are adopted, SDCI will work with SDOT to develop updates to the Streets Illustrated manual reflecting street design standards tailored to the industrial context and level of expected pedestrian and bicycle activity. Updates will consider street typologies and design standards that can accommodate both freight activity and non-motorized uses with a focus on reducing potential conflicts.
7-5	Will new zoning designations expand street tree requirements to the entire IC/II and IB/UI zone?	Per SMC 23.53.020.B.3 (Improvement requirements for existing streets in industrial zones), if a lot abuts a street designated on Map A for 23.50.016, street trees shall be provided along all designated frontages. These street tree requirements are limited to select streets in the Ballard-Interbay and Duwamish Industrial areas. Proposed development standards for the UI and II zones include street tree requirements on all streets in new development in those areas.
7-6	Will the list of industrial landscape streets and associated landscape standards be revised to align with future land use and transportation patterns in future MML zoning?	The industrial landscaped streets and standards will be revised to align. See also discussion in the development standards Appendix G .
7-7	In the MML zone, please clarify if streets improvements are intended to be consistent with what is currently required under IG zoning, or if more extensive development, standards will be developed to improve pedestrian access, circulation, and safety.	Landscape and street improvement standards will be modified more for the II and UI zones, than for the MML zone. However, some updates and modifications to the street improvement standards will occur for the MML zone. See also the development standards Appendix G .
7-8	The Draft EIS identifies modal conflicts and collisions near intersections. Does the analysis include documentation and analysis of curb cuts and vehicular access onto private property, and collision data related to turn movements onto private property?	The analysis includes all reported collisions within the study areas including crashes that related to turning movements to and from private property along the roadway. Characteristics of individual collisions were not analyzed for this programmatic evaluation.
7-9	Consider how standards developed within this body of work are coordinated with ST3 development standards and potential street design concepts for station frontages.	Comment is noted and forwarded to City decision makers. The Sound Transit EIS is a different proposal from the Industrial Maritime Strategy. City staff are coordinating information and data from Sound Transit to the greatest extent possible. Text has been added to the mitigation section of this EIS to note that the City and Sound Transit are coordinating on transportation mitigation around expanded and new light rail stations and notes the System Access Fund as a funding mechanism for station area improvements. See also Section 4.2.4 . Updated street design standards will also be developed for the upcoming update of the Streets Illustrated manual related to any new adopted zoning

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		designations as studied in this EIS. City code updates may also be implemented for station frontages. Sound Transit’s West Seattle and Ballard Link Extensions Draft EIS also covers non-motorized mitigation measures. Section ES.4 Avoidance, Minimization, and Mitigation Measures reads as follows: <i>“When maintaining a facility would not be feasible, Sound Transit would work with the City of Seattle to develop and implement a construction management plan to provide alternate facilities for non-motorized travel.”</i>
8	Acutanza	Seattle Freight Advisory Board
8-1	Summary of purpose and mission of the SFAB.	Thank you for your comments. The comment is noted and forwarded to City decision makers.
8-2	Additional analysis requested for the impacts of new land uses by all modal networks (heavy haul networks, rail systems, and intermodal yards supporting manufacturing uses). Additional questions about at-grade rail crossing impacts on the alternatives.	The Final EIS has been reorganized to include freight as a separate section throughout each element of the transportation section (Affected Environment, Impacts, Mitigation Measures, and Significant Unavoidable Adverse Impacts). This will include addressing intermodal yards, rail, and truck parking.
8-3	Additional analysis requested for issues related to demand for overnight truck parking and the impact on land uses. How do alternatives accommodate long-haul parking needs?	See response to comment 8-2.
8-4	Final EIS should acknowledge the heightened risk of impacts to pedestrians and cyclists from heavy and/or large vehicles. If alternatives increase conflicts with vulnerable users, impacts and mitigation measures should be identified.	The commenter requests that “the Final EIS in this industrial area should acknowledge the heightened risk of impacts to pedestrians, cyclists and scooter riders from heavy and/or large vehicles (like trucks, which are inherent to industrial operations).” Language to this effect was included in the Draft EIS (p. 3-388) and will be retained in the Final EIS. Supplemental language has also been added per the commenter’s suggestion regarding truck drivers’ limited range of sight distance and turning radii conflicts that aren’t expected with smaller vehicles. The Mitigation Measures, Pedestrian & Bicycle System Improvements section of the EIS identifies the types of mitigation measures that would complete network gaps for vulnerable users and separate them from motorized traffic. These include “facilities such as sidewalks, asphalt walkways, or painted walkways; signals to make crossing roadways easier; treatments such as rectangular rapid flashing beacons to alert drivers to people crossing the street; marked crosswalks; curb bulbs or extensions to shorten crossing distances and make people walking more visible to drivers; bicycle lanes (including protected and buffered bicycle lanes); and multi-use trails.” Language has been added to the mitigation section to reiterate that those measures would have safety benefits as they would separate vulnerable users from motorized traffic, particularly large trucks which inherently operate with higher-risk conflicts.
8-5	Mitigation in the Draft EIS is not applied or described in enough detail to know whether it will resolve the impacts mentioned—request the Final EIS to address the likelihood that mitigation would resolve or successfully lessen the negative impacts identified.	SEPA does not require quantification of the magnitude to which each measure would mitigate impacts and the non-project EIS addresses the qualitative effectiveness of the potential mitigation measures. This programmatic EIS addresses area-wide land use zoning changes, rather than a project-specific proposal. The proposal may result in a wide range of individual projects implemented over a long timeframe and across a large geographic

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		<p>area. Because the specific locations and sizes of development are unknown at this time, it would be speculative to identify specific mitigation measures. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation will be determined. The City is committed to seeking funding to implement these strategies as needed, but it would be speculative to quantify potential costs at this stage. Further, SEPA does not require cost information for mitigation. The City develops cost and funding options for its capital improvement programs.</p> <p>Secondary impacts are discussed on page 3-419 of the Draft EIS: <i>“It should be noted that some transportation mitigation projects could have secondary impacts. For example, converting a general-purpose travel lane or a parking lane to a transit lane, truck-only lane, or cycle track would reduce capacity for autos to travel or park. As required, the City would prepare additional analysis and take public and stakeholder input into consideration before implementing specific transportation improvement projects. Given the programmatic nature of this study, this EIS simply lists the types of projects that could be considered to mitigate potential impacts of the proposed alternatives.”</i></p>
9	Mohler	Seattle Planning Commission
9-1	<p>EIS must ensure any zoning proposals move to repair harms of the past and benefit affected communities through both public and private investment. Summary of key questions and concerns addressed in the letter.</p>	<p>Thank you for your comments. The EIS includes a section on historical land use and planning decisions that has an emphasis on past harms (see Section 3.8.1). A new subsection is added related to exclusionary zoning in the Final EIS. The EIS also includes a review of equity and environmental justice considerations in Chapter 1 and throughout the other chapters of the EIS. Where appropriate expanded discussion of mitigation measures is included with a focus on historically disproportionately impacted communities including Georgetown and South Park. See also response to comments 9-2 through 9-24 below.</p>
9-2	<p>Tribes should be consulted. 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.</p>	<p>See response to comments 9-1 and 9-22. The overview of past planning and land use decisions section of Section 3.8 and Section 3.11 Historic, Archaeological, & Cultural Resources recognizes the historical and present importance of Tribal lands. Input from Tribes was solicited during the scoping and Draft EIS comment periods.</p>
9-3	<p>(1) Additional analysis and requested mitigation related to equity and environmental justice. Specifically identify the key differences between the two MICs when documenting impacts and proposing mitigation measures for each.</p> <p>(2) 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.</p> <p>(3) Recognize that more new jobs will be created in the BINMIC than in the Duwamish Valley under the proposed alternatives. 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.</p>	<p>(1) The impacts analysis under each environmental topic considers impacts common to all industrial areas as well as those specific to each of the five subareas defined within the MICs (Ballard, Interbay Dravus, Interbay Smith Cove, SODO/Stadium, and Georgetown/South Park).</p> <p>(2) Please see Section 3.2.1, Pollutants of Concern for a discussion of health impacts associated with exposure to criteria air pollutants [carbon monoxide (CO); particulate matter (PM); ozone, and the ozone precursors (volatile organic compounds [VOCs] and oxides of nitrogen [NOX]); sulfur dioxide (SO₂); and lead], or toxic air pollutants. Section 3.2.2 discusses potential impacts associated with each alternative, including potential increased exposure to these air pollutants. At this non-project level of analysis, more specific analysis of potential health impacts is not possible, as specific developments, development locations, site-specific conditions, exposure pathways and receptors are unknown. Subsequent developments that may arise from the proposed land</p>

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		<p>use changes in the industrial and maritime strategy will be required to meet all applicable codes and regulations, and to conduct project-level SEPA review at that time, in which analysis will be conducted to assess site specific impacts and necessary mitigation measures. See Section 3.2 Air Quality & GHG.</p> <p>Please see Effects of Noise on People in Section 3.6.1 for a discussion of health impacts associated with exposure to environmental noise. At this non-project level of analysis, more specific analysis of potential health impacts is not possible, as specific developments, development locations, site-specific conditions, noise sources and receptors are unknown. Subsequent developments that may arise from the proposed land use changes in the Industrial and Maritime Strategy will be required to meet all applicable codes and regulations, and to conduct project-level SEPA review at that time, in which analysis will be conducted to assess site specific impacts and necessary mitigation measures.</p> <p>Site redevelopment activities in general have a positive effect on legacy contamination caused during previous decades of less stringent regulations, because sites must be characterized and remediated in order to receive financing, and/or to satisfy conditions of Consent Decrees or Administrative Orders. Please see Contamination Section 3.5.3 Mitigation Measures for a description of how environmental health impacts to both residents and workers from exposures to environmental hazards such as contamination would be mitigated under all alternatives.</p> <p>(3) The Draft EIS recognizes equity and accessibility as one of the six key emerging factors affecting Seattle's MICs, specifically access to maritime and other industrial career opportunities for BIPOC and women. Maintaining a strong industrial economy is a prerequisite to providing these opportunities, but other strategies including outreach to BIPOC youth and workforce training investments are key parts of the Industry and Maritime Strategy.</p>
9-4	<p>Additional analysis and requested mitigation related to Land & Shoreline Use. 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 II and UI 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</p>	<p>SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). See Section 4.2.1. The EIS includes employment projections associated with each alternative including proportion of industrial and non-industrial jobs. Amounts of employment are estimated for subareas. The distribution of jobs by subarea is shown in Exhibit 2.4-40. Alternatives assume 700 square feet per industrial employee and 250 square feet per non-industrial employee similar to buildable lands assumptions. Building space associated with each alternative is illustrated in Exhibit 3.1-4, and a similar graph in Exhibit 3.5-7.</p>

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	<p>establishing higher standards for landscaping and multi-modal transportation to create healthier transitions within single-use industrial zones.</p>	
9-5	<p>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.</p>	<p>Shoreline Master Program regulations are summarized in Section 3.8 Land & Shoreline Use and Appendix F. No changes to Shoreline Master Program regulations are proposed as a part of this action.</p>
9-6	<p>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. Recommend goals and policies codify language around BIPOC and gender-inclusive job training programs and access to opportunity for both the BINMIC and Greater Duwamish MIC subarea plans.</p>	<p>The Draft EIS recognizes equity and accessibility as one of the six key emerging factors affecting Seattle's MICs, specifically access to maritime and other industrial career opportunities for BIPOC and women. Maintaining a strong industrial economy is a prerequisite to providing these opportunities, but other strategies including outreach to BIPOC youth and workforce training investments are key parts of the broader Industry and Maritime Strategy's non land-use components that are not required to be analyzed in an EIS under SEPA, but are components the City can address in its economic development strategy implementation.</p>
9-7	<p>Additional analysis and requested mitigation related to housing. Concerned with the broad impacts on housing citywide and throughout the region resulting from increased employment growth under the Action Alternatives. Concerned proposed mitigation measures may not be sufficient to address the housing needs associated with the significant job growth. Suggest including a jobs/housing analysis, current and future housing capacity outside Seattle that will be accessible via light rail, impacts of residential uses in industrial areas through an environmental justice and public health lens, and trade-offs associated with allowing industry-supportive residential uses. Request appropriate mitigation measures for the many skilled workers that may need to commute long distances to new jobs and evaluation of tools such as impact fees to generate additional affordable housing options within Seattle.</p>	<p>Comment is noted. In the Preferred Alternative, the number of dwellings in industrial areas is projected to increase by 1,475 units—less than the amount studied in Draft EIS Alternative 4 (720 less). Allowances for caretakers' quarters and makers studios in the UI zone are more limited than Alternative 4 in the Draft EIS—only 2% of such new units are projected citywide (2019-2044). Two new areas outside the MICs in west Ballard and Judkins Park would be converted to mixed use zoning allowing housing, in addition to the proposed mixed-use areas in Georgetown and South Park. Overall, a slightly lower total amount of housing production would result compared to Draft EIS Alternative 4 (8%), but it would be outside of MICs, or subject to standards to reduce conflicts. Affordability requirements proposed with the Preferred Alternative are described in Appendix G.</p> <p>The City will plan for the citywide amount of housing growth in the Comprehensive Plan EIS on a citywide scale. Applying MHA to the proposed new II zone can also be a mitigation strategy.</p>
9-8	<p>Additional analysis and requested mitigation related to transportation.</p>	<p>See response to comments 9-9 through 9-12.</p>
9-9	<p>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 Draft EIS.</p>	<p>As described in Chapter 1, the EIS analyzes alternatives representing different potential futures for the city's industrial lands with the aim of both strengthening land use projections for core and legacy industrial and maritime areas and encouraging denser development coupled with industrial businesses near transit stations. The ridership projections published in the WSBLE Draft EIS have been referenced in the Final EIS. The percent of job growth is higher in Ballard and Interbay where stations are planned compared with other areas. See Exhibit 1.5-21 of this Final EIS.</p>

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9-10	Identify specific mitigation measures for impacts to freight mobility and logistics.	The EIS includes a Mitigation Measures section which describes the various plans that include specific projects and high priority areas for improvement. Those documents include: the Freight Master Plan, Transit Master Plan, Pedestrian Master Plan, the Bicycle Master Plan, the Bicycle and Pedestrian Safety Analysis, the Ballard-Interbay Regional Transportation (BIRT) System Report, and the Georgetown Mobility Study.
9-11	Conduct an equity analysis to identify impacts resulting from conflicts between freight traffic and other modes in communities without sufficient non-motorized infrastructure and identify appropriate additional mitigation measures. Consider mobility hierarchy through an equity lens when assessing mitigation measures.	<p>The EIS includes an Equity & Environmental Justice Considerations section (see Section 3.10.2) describing which portions of the study area have large proportions of priority populations and how they could be affected by the alternatives. In particular, it references potential impacts to the safety of people walking and biking in neighborhoods with histories of long-term underinvestment.</p> <p>With respect to considering a mobility hierarchy through an equity lens, SDOT is currently in the process of developing the Seattle Transportation Plan which will integrate the City's modal plans into a comprehensive vision for the citywide transportation network centered around the following values and goals: equity, safety, mobility, sustainability, livability, and excellence.</p>
9-12	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.	<p>A link has been added to the Final EIS so that readers can explore detailed data in the City's interactive GIS database within their areas of interest.</p> <p>The EIS includes a Mitigation Measures section which describes the various plans that include specific projects and high priority areas for improvement. Those documents include: the Freight Master Plan, Transit Master Plan, Pedestrian Master Plan, the Bicycle Master Plan, the Bicycle and Pedestrian Safety Analysis, the Ballard-Interbay Regional Transportation (BIRT) System Report, and the Georgetown Mobility Study.</p> <p>The Mitigation Measures, Pedestrian & Bicycle System Improvements section of the EIS identifies the types of mitigation measures that would complete network gaps for vulnerable users and separate them from motorized traffic. These include "facilities such as sidewalks, asphalt walkways, or painted walkways; signals to make crossing roadways easier; treatments such as rectangular rapid flashing beacons to alert drivers to people crossing the street; marked crosswalks; curb bulbs or extensions to shorten crossing distances and make people walking more visible to drivers; bicycle lanes (including protected and buffered bicycle lanes); and multi-use trails."</p>
9-13	Additional analysis and requested mitigation related to biological resources and resiliency.	See response to comments 9-14 through 9-18.
9-14	Clearly identify risks of all construction in liquefaction zones.	Text has been added to Section 3.1.2 Impacts to address the risks associated with construction of water, wastewater, and transportation infrastructure. See Section 3.1 Soils/Geology .
9-15	Additional analysis of air quality impacts on residential areas near industrial zones such as South Park and Georgetown; and of co-locating offices and other non-industrial uses above industrial spaces in the Industry and Innovation land use concept.	This non-project EIS provides an assessment of the existing levels of regulated pollutants and compliance with the NAAQS, and anticipated air emissions associated with potential land use changes based on two sources of baseline ambient air quality conditions data: 1) from Ecology- and PSCAA-operated ambient air quality monitoring stations; and 2) from air quality data collected directly by The City of Seattle at eight sites within the BINMIC and

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		<p>Greater Duwamish MIC—selected due to the location or potential zoning changes in alternatives or due to their proximity to air quality emission sources. All data indicate that air pollutant concentration trends, and individual measurements, for these pollutants remain below the NAAQS when wildfire is excluded.</p> <p>SEPA's procedural provisions require the consideration of "environmental" impacts (see definition of "environment" in WAC 197-11-740 and of "impacts" in WAC 197-11-752), with attention to impacts that are likely, not merely speculative. (See definition of "probable" in WAC 197-11-782 and 197-11-080 on incomplete or unavailable information.</p> <p>The current level of analysis provides an appropriate level of detail for a non-project EIS (see WAC 197-11-442 for a description of the contents of an EIS on non-project proposals), and without more specific knowledge of development locations, site-specific conditions, exposure pathways and receptors at proposed developments, additional analysis would be overly speculative. Subsequent developments that may arise from the proposed land use changes in the Industrial and Maritime Strategy will be required to meet all applicable codes and regulations, and to conduct project-level SEPA review at that time, in which analysis will be conducted to assess site specific impacts and necessary mitigation measures.</p>
9-16	<p>(1) Analyze and document future projections of rainfall and stormwater flows. Evaluate the extent of existing stormwater and water quality impacts to determine whether the Action Alternatives can provide significant beneficial impacts.</p> <p>(2) Identify opportunities for increasing innovative green infrastructure in industrial zones to protect water quality and mitigate climate change.</p>	<p>(1) As stated in Sections 3.3 and 3.14, development under any alternative will be required to meet current stormwater regulations which is expected to improve stormwater management relative to existing conditions. This conclusion applies to any land use type in the Study Area, including industrial and maritime areas. Additional text has been added to clarify that this is true even if rainfall patterns increase in intensity. Sections 3.3 and 3.14 provide an assessment of future impacts to water resources relative to existing conditions, which is appropriate for this EIS.</p> <p>(2) Green infrastructure methods are standard for meeting on-site stormwater management as stated in Section 3.14. Site specific analysis would be performed at the lot level during redevelopment projects. Redevelopment projects will result in improved water quality and flow control (if applicable and feasible).</p>
9-17	<p>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.</p>	<p>Sea level rise is addressed through existing regulations as discussed in Section 3.3.2. Subareas sensitive to sea level rise are discussed in this section, along with mitigation measures in Section 3.3.3. Given the non-project nature of this EIS, Section 3.3 provides an appropriate level of detail on the risk and impact of development related to sea level rise. Subsequent developments that may arise from the proposed land use changes in the Industrial and Maritime Strategy will be required to meet all applicable codes and regulations, and to conduct project-level SEPA review at that time, in which analysis will be conducted to assess site specific impacts and necessary mitigation measures.</p>
9-18	<p>Identify the ecosystem benefits of adding green infrastructure and increasing trees and green landscaping in and near the MICs.</p>	<p>Analysis of impacts for each alternative in Section 3.4 Plants & Animals includes a discussion of how green infrastructure and increasing trees/landscaping provides opportunities for stormwater treatment and additional wildlife habitat.</p>

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9-19	Additional analysis and requested mitigation related to environmental health and compatibility.	See response to comments 9-21 through 9-24.
9-20	<p>(1) Identify and analyze any potential contamination impacts on future residential uses in or near industrial areas.</p> <p>(2) Restore lands and shorelines with industrial contamination, including contaminants in fish from waterways adjacent to industrial areas.</p>	<p>(1) This non-project EIS is limited to a general discussion of potential contamination impacts of alternatives on future residential land uses near industrial areas. The current level of analysis provides an appropriate level of detail for a non-project EIS.</p> <p>Please refer to Section 3.5.3 that describes how redevelopment at individual parcels will have to comply with all regulatory requirements at that time such as SEPA, and MTCA which sets stricter cleanup levels for residential land uses. See Section 3.5 Contamination.</p> <p>(2) Comment acknowledged. Restoration of shorelines and remediation of contaminated sites is accomplished on a site-specific basis at the time of redevelopment and through the project permitting process. The process of site characterization, remediation, and preventing recontamination of the Lower Duwamish Waterway during site construction activities for example, is closely scrutinized by Ecology, EPA, and others.</p>
9-21	Support the proposed mitigation measure to limit proximity of new residential development to known or anticipated sources of high noise levels.	Comment is noted.
9-22	Concerned that the list of data sources in Section 1.7.11 (page 1-62) does not include tribal consultation. Suggest codifying consultation with the Duwamish Tribe to redress historic exclusion, despite the tribe not yet being federally recognized. Request listing specific indigenous tribes as well as acknowledging other settlement in addition to Euro-American settlement.	<p>The cultural resources consultant accessed WISAARD's archaeological records that contain known Tribal cultural sites. These records are considered restricted and confidential. Cultural resources review is a process that is done prior to the start of many projects and includes consultation with Tribes. Many federal, state, and local statutes and ordinances require notice and consultation with affected Tribes before, during, and after project review. The National Historic Preservation Act (NHPA) of 1966, was amended in 1986 with provisions for consultation with affected Tribes and 1992 to include and clarify the roles and responsibilities of Indian Tribes in Section 106 reviews.</p> <p>The Advisory Council on Historic Preservation (ACHP) adopted a Policy Statement Regarding the ACHP's Relationships with Indian Tribes in 2000. The policy was developed in consultation with some Tribes and inter-Tribal organizations, and addresses tribal sovereignty, government-to-government consultation, trust responsibilities, tribal participation in historic preservation, sympathetic construction, and respect for tribal religious and cultural values.</p> <p>The state of Washington has a government-to-government relationship with the 29 federally recognized Tribes in the state (RCW 43.376). Each Tribe is a sovereign nation and has its own definition of appropriate consultation.</p> <p>Input from Tribes was solicited during the scoping and Draft EIS comment periods.</p> <p>The statutes and ordinances specify consultation with federally recognized Tribes only. In addition, the City solicited input directly from the Duwamish.</p>

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		in the ethnographic background section (Section 3.11.1), the Duwamish Tribe and significant cultural locations to the Tribe are specifically discussed. The Duwamish Tribe as well as the federally recognized Muckleshoot, Snoqualmie, Suquamish, and Tulalip Tribes are also addressed under Historic Period Context .
9-23	Increase and/or improve parks and open space in and near the MICs, especially in the Duwamish Valley, where appropriate in an industrial context. Request analysis and documentation of impacts related to the need for parks and open space resulting from future residential uses within industrial areas.	See Section 3.12 Open Space & Recreation for an analysis of additional need for parks and open space under each of the alternatives. It addresses the demand for parks by subarea with all housing types under each alternative.
9-24	Analyze 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.	See Section 3.13 Public Services for an analysis of additional need for fire and emergency medical services, police, and schools and libraries under each of the alternatives related to both increases in residential and worker populations. The City identified specific public services to be studied in the EIS during scoping.
10	Gannon	Seattle Public Schools
10-1	Appreciates the opportunity to comment. SPS owns and operates the John Stanford Center for Educational Excellence in the SODO neighborhood. MML designation would render SPS's use of the Stanford Center as legally nonconforming limiting development flexibility in the future.	Thank you for your comments. See Section 4.2.2 concerning non-conforming uses. The different alternatives in the EIS consider different zoning designations on the referenced site. The Preferred Alternative includes the site in the II zone.
10-2	Alternatives considered could better address existing conditions and encourage both industrial and office development in a more flexible manner.	The studied alternatives are intended to promote industrial uses consistent with VISION 2050 MIC requirements and recognize evolving employment formats and supportive uses. See Appendix G of the Final EIS for the Preferred Alternative conceptual code.
10-3	Draft EIS greatly understates the environmental and community impacts of the Action Alternative by precluding development that exceeds its strict limitations on storage, offices, sales and services, restaurants.	The EIS studies the No Action Alternative as well as action alternatives. The MIC policies have for some time intended to maintain industrial uses as primary in zones. See also response to comment 10-2.
10-4	Alternative 2 could preclude the development of properties leaving them vacant and maintaining status quo, particularly in SODO.	Comment noted. See Section 4.2.2 concerning non-conforming uses.
10-5	Environmental cleanup will not occur if redevelopment is rendered infeasible, causing adverse impacts.	See Section 3.4.2 addressing impacts of a lack of redevelopment.
10-6	(1) Assumption that there would be improved infrastructure in areas zoned as II needs further exploration; uses prohibited or made difficult by the Alternatives will be sited further from the people that use them, thus increasing the volume and length of vehicle trips and causing significant adverse transportation impacts. (2) Alternatives do not take advantage of light rail proximity and instead encourage heavy car usage.	(1) The EIS evaluates the uses allowed in the MIC, including industrial and non-industrial employment and limited housing. The results of the evaluation on all modes and needed mitigation measures at a planning level are provided in the EIS. (2) The II zone is considered for the site in alternatives 3 and 4 and the Preferred Alternative. It would allow mixed use with industrial, technology, and office in proximity to light rail. See response to comment 10-7 below for additional information. (3) The City is working closely with Sound Transit as the ST3 project moves forward.

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	(3) City should work with Sound Transit to ensure that Final EIS is aligned with ST3.	
10-7	Final EIS should provide alternatives that allow for non-industrial uses in SODO.	Comment is noted and forwarded to City decision makers. Alternatives studied in the EIS are consistent with the PSRC criteria for designating MICs to focus industrial uses in the MIC. Non-industrial uses in the proposed MML zone are permitted as a principal use only when subject to strict maximum size of use limits and FAR sub-limit. Non-industrial uses are permitted subject to strict maximum size of use limits only, and are only allowed as bonus development in the II zone. Non-industrial uses ancillary to an industrial use would be allowed in the proposed MML and UI zones under varying requirements. Alternatives 3 and 4 and the Preferred Alternative consider limited additional flexibility of existing allowances for caretakers' units and artist/studio quarters, or other criteria-limited affordable housing, in the proposed UI zone only. The II zone, applied in alternatives 3 and 4 and the Preferred Alternative, would allow for a significant amount of non-industrial uses through a development bonus system. The II zone would be applied under multiple alternatives to the area around the SODO/Lander St. station in the SODO area.
11	Persak	The Office of Economic Development
11-1	Want to advocate for actions which cumulatively will have the least Significant Impacts, and the lowest possible risk for Significant Unavoidable Adverse Impacts to the maritime, manufacturing, and logistics industry's supporting land use activities and transportation safety, so that these jobs remain for future generations.	Thank you for your comments. The comment is noted and forwarded to City decision makers.
11-2	Top priority is centering workforce development for BIPOC communities and women to benefit from more direct pathways into maritime, manufacturing, and logistics. Retention and expansion of "missing middle" livable wage jobs in Seattle can be achieved in maritime, manufacturing, and logistics within the footprint of Seattle's MICs if we can prioritize the functionality of these spaces.	The comment is noted and forwarded to City decision makers. The EIS recognizes equity and accessibility as one of the six key emerging factors affecting Seattle's MICs, specifically access to maritime and other industrial career opportunities for BIPOC and women. Maintaining a strong industrial economy is a prerequisite to providing these opportunities, but other strategies including outreach to BIPOC youth and workforce training investments are key parts of the Industry and Maritime Strategy.
11-3	Publicizing training, retention strategies, and partnering with employers and CBOs who are committed to equity in maritime, manufacturing, and logistics is more effective when there is a built environment that supports business longevity.	The comment is noted and forwarded to City decision makers.
11-4	Final EIS and adoption of Comprehensive Plan amendments should provide more policy stability for future job growth in maritime, manufacturing, and logistics. Appreciate the EIS public comment opportunities thus far.	The comment is noted and forwarded to City decision makers.
11-5	Future multiple opportunities for engagement will build on the results of this effort. Final EIS will be the necessary cornerstone to make progress on future planning.	The comment is noted and forwarded to City decision makers.

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11-6	Offers qualified support for Alternative 2.	The comment is noted and forwarded to City decision makers.
11-7	Emphasis on maritime, manufacturing, and logistics job growth is highest under Alternative 2.	The comment is noted and forwarded to City decision makers.
11-8	PSRC requires a 50% rate of “industrial” employment in the MIC. Alternatives 3 and 4 risk falling below that threshold.	The comment is noted and forwarded to City decision makers. Conditions in both the Greater Duwamish MIC and the BINMIC would still meet PSRC’s regional criteria under all of the alternatives studied.
11-9	Study SR 509 through South Park, SR 599 feeding into SR 99, and 1st Avenue Bridge— extent of impacts is unknowable without additional study.	See response to comment 2-4.
11-10	Alternative 2 represents the highest land use capacity for maritime, manufacturing, and logistics while addressing some past limitations, and supports future TOD along light rail extensions.	The comment is noted and forwarded to City decision makers.
11-11	Alternatives 3 and 4 would incur substantial more costs to mitigate traffic congestion and safety, presenting a higher risk that mitigation does not actually occur in the long run due to financial constraints.	SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). See Section 4.2.1 . Please note that the Preferred Alternative growth is more similar to Alternative 2 and would have lesser traffic impacts than alternatives 3 and 4.
11-12	Alternative 2 represents less future risk of protracted community conflicts over land use and supportive appropriate transportation modes for the MIC.	The comment is noted and forwarded to City decision makers.
11-13	Open space concepts in the Georgetown neighborhood should be studied under new UI zoning.	Section 3.12 discusses the effects on demand for and need for new open space resources under different land use and growth scenarios. Mitigation measures in the open space section consider approaches to providing open space.
11-14	In Alternative 2, there is no significant residential housing expansions in the UI zone under Alternative 2, whereas there is expansion in alternatives 3 and 4. The UI zone in each Action Alternative represent a one size fits all approach, despite the substantial differences in the needs and challenges of these areas.	The comment is noted and forwarded to City decision makers. Alternatives consider different patterns and location of zone changes in response to local conditions and needs. The Preferred Alternative includes a new pattern of zoning changes, including the extent of the UI zone, in response to comments on the Draft EIS.
11-15	Flexibility in the current STOAD provides ample opportunity for further in-fill development but the “buffering” potential has not been fully utilized. Moving ahead in the STOAD on UI as presented may induce demand for additional mixed-use south of the Overlay beyond what is already allowed. No data presented in Draft EIS to suggest community preference for new housing near freeways, major truck streets, and other heavy uses in SODO.	The EIS alternatives include analysis of potential impacts of varied amounts and concentrations of housing under different alternatives in Section 3.9 Housing . Section 3.8 Land & Shoreline Use evaluates potential land use impacts. Consistent with the PSRC criteria for designating MICs to focus industrial uses in the MIC, the EIS does not study allowing significantly expanded residential uses in the majority of the study area. The City has no data on the additional demand for mixed-use that would be induced because of potential zoning changes in the STOAD.
11-16	Impacts of changing IG2 zoning in Georgetown to mixed use zoning demands a separate analysis. Alternative 2 should be modified to	Additional detail regarding development standards to address the unique conditions in the proposed mixed use zoning in Georgetown are included under the Preferred Alternative, in the

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	create an overlay for Georgetown to recognize and preserve its distinct character.	development standards Appendix G . This includes incentive features to protect distinct character.
11-17	Document should disaggregate data for collisions between vehicles and bikes vs. trucks and bikes, and include discussion on risk factors of truck and bicycle/pedestrian collisions for each alternative.	<p>Language distinguishing between the safety risks of cars and trucks was included in the Draft EIS (p. 3-388) and is retained in the Final EIS.</p> <p>This programmatic EIS addresses area-wide land use zoning changes, rather than a project-specific proposal. The proposal may result in a wide range of individual projects implemented over a long timeframe and across a large geographic area. Because the specific locations and sizes of development are unknown at this time, it would be speculative to identify how modal conflict risk factors may compare in particular locations. However, the VMT increase range discussed on page 3-388 of the Safety impacts section of the Draft EIS has been broken out by alternative to compare the relative exposure of vulnerable users. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation (including potential conflicts between trucks and people walking and biking) will be determined.</p>
11-18	<p>(1) Additional data on truck parking, especially where capacity is at an equilibrium and at capacity for other vehicle needs to be considered, and realistic and achievable solutions identified.</p> <p>(2) Draft EIS should discuss peak game day traffic patterns in their impact on freight.</p> <p>(3) Draft EIS should analyze impact of the inventory and functionality of truck loading zones and other freight access points for all alternatives.</p>	<p>(1) [City input needed—do you have data regarding truck parking that could be referenced? We are adding general text about truck parking needs, but have not seen any quantitative demand data] Additional information about truck parking has been added throughout the transportation chapter of the Final EIS.</p> <p>(2) A text box has been added to the Final EIS referencing the large event venues in the study area and gameday conditions.</p> <p>(3) The EIS includes a Parking impacts section describing the competing needs for public curb space and acknowledges that the action alternatives are expected to result in significant adverse impacts to on-street parking absent mitigation measures. This programmatic EIS addresses area-wide land use zoning changes, rather than a project-specific proposal. The proposal may result in a wide range of individual projects implemented over a long timeframe and across a large geographic area. Because the specific locations and sizes of development are unknown at this time, it would be speculative to quantify truck loading demand in a particular location. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation (including on-street parking) will be determined. The SDOT Curbside Management Team actively identifies and installs commercial vehicle and general load/unload zones in business districts throughout Seattle and would identify load zone needs with new development as needed or requested by development projects. SDOT is also working on potential policy changes to more actively install load zones and other curb access needs at new development during the City development review process.</p>
11-19	Qualified support for Alternative 2.	The comment is noted and forwarded to City decision makers.
12	Brower	Brower Law, Salmon Bay Sand and Gravel Company
12-1	Generally support Alternative 3 but want to ensure the City doesn't continue trying to locate incompatible uses in industrial areas.	Thank you for your comments. The comment is noted and forwarded to City decision makers.

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12-2	Seattle must stop trying to locate incompatible uses in maritime and industrial zones because doing so actively undermines existing maritime and industrial businesses.	Comment is noted. Section 3.8 Land & Shoreline Use discusses land use compatibility impacts under all alternatives including potential impacts of non-industrial uses on the ability of industrial uses to operate effectively.
12-3	OPCD must recognize how incompatible uses will undermine its industrial areas. OPCD should revise goal B1-G11 and B1-P15 in the 2020 comp plan to prohibit location and construction of recreational uses in the BINMIC.	Comment is noted. Section 3.8 Land & Shoreline Use discusses compatibility impacts.
12-4	Revise transportation figures in Seattle 2035 to eliminate incompatible uses/co-locations. Unsupportive of the missing link strategy through the BINMIC.	Comment is noted. The City will address the MIC Plan to address regional requirements and can consider consistency with other City policies as appropriate.
12-5	Supportive of alternatives 3 and 4 approach to make it harder if not impossible to rezone industrial lands to non-industrial uses.	Comment is noted and forwarded to City decision makers.
13	Burke	Freemont Dock Company via Houlihan Law
13-1	Appreciates the opportunity to comment. Fremont Dock Company owns properties in Ballard and Fremont within the study area, and is a member of the Ballard Council and North Seattle Industrial Association.	Thank you for your letter. The comment is noted and forwarded to City decision makers.
13-2	Draft EIS is inadequate because the zoning changes and implementing development regulations should be considered together.	This is a programmatic level EIS. Sufficient detail about the proposed development standards to fully consider the potential for environmental impacts is included, such as preliminary zoning maps, tables of potential standards, etc. See Chapter 2 . The Draft EIS includes sufficient detail about proposed development standards and potential zoning changes. Based on the Draft EIS evaluation and mitigation measures, a Preferred Alternative has been developed, and finer grained preliminary development standards are included in this Final EIS. See Final EIS Appendix G .
13-3	Proposal is not sufficiently defined to allow meaningful environmental review because “industrial” is not defined.	See response to comment 13-2. The Final EIS includes a new table specifying which specific land uses would be qualifying as industrial under the proposed zones. See Appendix G .
13-4	Alternatives are inconsistent with the locational criteria and proposed polices.	Section 3.8 Land & Shoreline Use discusses the degree of consistency of the alternatives with policies.
13-5	Alternatives should be proposed, reviewed, and selected on a subarea basis.	All alternatives include detailed proposals with map information to specific boundaries for all subareas. Where feasible and practical, impacts are summarized on the basis of five subareas indicated on Exhibit 2.1-1 .
13-6	Draft EIS does not adequately consider Sound Transit’s planned Ballard light rail extension.	Comment is noted and forwarded to City decision makers. The Sound Transit EIS is a different proposal from the Industrial Maritime Strategy. City staff are coordinating information and data from Sound Transit to the greatest extent possible. See responses to comment themes regarding light rail in Section 4.2.4 .
13-7	Draft EIS does not adequately assess impacts on Land & Shoreline Use.	Impacts are assessed in Section 3.8 Land & Shoreline Use .
13-8	City should assess the purely economic impacts on individual businesses and land owners.	SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). See Section 4.2.1 .

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13-9	All IC and IB zoned land east of 3 rd Ave NW to the Aurora bridge should remain or be changed to IC.	Land in the noted geography is retained in the IC zone under the Preferred Alternative. See Chapter 2 of the Final EIS and Appendix C .
13-10	All IB zoned land in the study area east of the Aurora bridge to I-5 should be zoned IC.	Comment is noted and forwarded to City decision makers.
13-11	Development regulations should allow bulk and dimension limitations to be met on a project-wide basis and not a parcel-by-parcel basis.	During development review development standards would be applied on the basis of the particular site consistent with current practices by SDCI.
14.1	Ciserella	Cantera Development Group
14-1	Asks OPCD to provide a true analysis of the existing conditions and consider alternatives that allow for more flexible development in light industrial zones. City should withdraw the Draft EIS and reissue a new Draft EIS.	Thank you for your comments. The comment is noted and forwarded to City decision makers. Action Alternatives include more flexible development regulations compared to existing regulations, especially in the proposed UI and II zones.
15	Clark	CleanTech Alliance
15-1	Appreciate the opportunity to comment. In favor of a comprehensive strategy to strengthen and grow Seattle's industrial and maritime sectors. Not offering specific comments on the various Action Alternatives—comments provide additional information that may assist in the selection of the best alternative.	Thank you for your comments. The comment is noted and forwarded to City decision makers.
15-2	Description of the CleanTech Alliance, general support for the Seattle Industrial & Maritime Strategy, and specific examples of events and programs aimed at accelerating cleantech innovations and related business development aligned with the strategy.	The comment is noted and forwarded to City decision makers.
16	Clawson	Interbay Urban Investors
16-1	Appreciate the opportunity to comment. Submitting on behalf of Interbay Urban Investors who own property at 2210 W Armory Way (zoned IG2 in the BINMIC). Draft EIS does not account for the existing realities of the south Interbay corridor (specifically portions that are primarily office/retail and no longer in industrial use).	Thank you for your comments. The comment is noted and forwarded to City decision makers and forwarded to City decision makers. EIS alternatives, including the Preferred Alternative would apply the proposed II zone to the noted geography, which would allow for significantly expanded development capacity and allowable uses compared to the existing IG2 zone.
16-2	Draft EIS does not address what will happen to properties in the south Interbay corridor that would become severely nonconforming.	Nonconforming uses are permitted to continue subject to provisions of the Seattle Land Use Regulations (SMC Subtitle III). See Section 4.2.2 for a comprehensive response.
16-3	City should complete an economic and affordability study that considers the impacts on housing supply and affordability of keeping land like this zoned industrial. Draft EIS must acknowledge the impact on housing displacement.	SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). See Section 4.2.1 . The MIC requirements under VISION 2050 limit non-industrial uses including housing. The action alternatives evaluate industry supportive housing inside the MIC, and targeted areas of mixed uses outside of the MIC. One of the impact thresholds used to identify potential adverse housing impacts in the study area (see Section 3.9) and at a subarea level (where applicable) addresses displacement. Impacts of the alternatives on housing are considered significant if they:

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		<ul style="list-style-type: none"> Result in loss of housing due to redevelopment and insufficient development capacity, tools, or programs to address displacement of dwellings and population. <p>With limited housing inside the MIC, there is a correspondingly lower risk of displacement. With the II zone there is an opportunity to apply MHA regulations to address demand for and funding of affordable housing.</p> <p>See also Section 4.2.10.</p>
16-4	Draft EIS does not analyze if the south Interbay corridor is well suited for industrial use under City and VISION 2050 criteria.	Section 3.8 Land & Shoreline Use discusses consistency of alternatives with City and regional policies, as well as land use compatibility impacts.
16-5	Draft EIS fails to analyze the impact on loss of multimodal transit, and the climate implications.	<p>The City of Seattle agrees that a main contributor of climate gases in the Pacific Northwest is from transportation/cars, and that combining housing and transportation together is one of the main strategies to reduce climate emissions. Section 3.2 Air Quality & GHG evaluates the potential air quality and greenhouse gas impacts associated with the action alternatives compared with the No Action Alternative.</p> <p>As referenced in WAC 197-11-442(4), “The EIS’s discussion of alternatives for a comprehensive plan, community plan, or other areawide zoning or for shoreline or land use plans shall be limited to a general discussion of the impacts of alternate proposals for policies contained in such plans, for land use or shoreline designations, and for implementation measures. The lead agency is not required under SEPA to examine all conceivable policies, designations, or implementation measures but should cover a range of such topics. The EIS content may be limited to a discussion of alternatives which have been formally proposed or which are, while not formally proposed, reasonably related to the proposed action.”</p> <p>The City believes that the analysis of impacts and mitigation measures conforms to the requirements cited above, and that the analysis covers a reasonable range of actions that may result from implementation of the Industrial and Maritime Strategy, including the potential for a different land use designation of the property referenced in the comment.</p>
16-6	Air quality and noise impacts on Interbay in general and for the property at 2210 W Armory Way, specifically.	<p>Additional text has been added to Section 3.2.2 to reflect potential air quality impacts to adjacent residential and mixed-use land uses from areas that continue to maintain an industrial focus under the proposed alternatives (Section 3.2 Air Quality & GHG).</p> <p>See Section 3.6.2 for a discussion of potential noise impacts on residential or mixed use land uses adjacent to existing industrial areas or areas that will remain industrially focused in all MIC subareas under the proposal (Section 3.6 Noise).</p>
16-7	Consider environmental and stormwater impacts if redevelopment does not occur in the south Interbay corridor and specifically on the property at 2210 W Armory Way.	Additional text has been added to Section 3.3.2 to reflect stormwater requirements, in general, for industrial parcels that do not redevelop (Section 3.3 Water Resources).
16-8	Draft EIS should consider the Sound Transit Draft EIS and light rail alignment option.	The comment is noted and forwarded to City decision makers. The Sound Transit EIS is a different proposal from the Industrial Maritime Strategy. City staff are coordinating information and data from Sound Transit to the greatest extent possible. See Section 4.2.4 .

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16-9	Draft EIS is not clear about what will happen to the armory property.	The proposal includes a policy change calling for collaborative master planning of the Armory site. The site is within the MIC, and the proposal is that updated MIC policies and industrial zone designations will apply to the site. Should the State and partners wish to pursue non-industrial future uses, that would be determined in the master plan in partnership with the City and other entities.
16-10	Alternatives should consider the relative impacts of removing the south Interbay corridor and Armory property from industrial designation as almost the entirety of the corridor is no longer in industrial use.	The comment is noted and forwarded to City decision makers. The proposal includes a policy change calling for collaborative master planning of the Armory site. The site is within the MIC, and the proposal is that updated MIC policies and industrial zone designations will apply to the site. Should the State and partners wish to pursue non-industrial future uses, that would be determined in the master plan in partnership with the City and other entities. An existing land use analysis is included in Section 3.8 Land & Shoreline Use . The City's proposed action intentionally limits removal of land from a MIC to focused locations in the South Park and Georgetown neighborhoods.
17	Clawson	Madisonian Manager, LLC
17-1	Appreciate the opportunity to comment. Submitting on behalf of Madisonian Manager who own property at 900 Poplar Place S (zoned IC-65(M) outside of an MIC). Draft EIS should study taking this property out of industrial zoning and allow housing (similar to adjacent properties).	Thank you for your letter. The comment is noted and forwarded to City decision makers. The Preferred Alternative applies a mixed use zone that would allow housing to a portion of the noted geography.
17-2	City should complete an economic and affordability study that considers the impacts on housing supply and affordability of keeping land like this zoned industrial. Draft EIS must acknowledge the impact on housing displacement and land use conflicts as IC zoning does not currently allow for residential uses.	SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). See Section 4.2.1 , Section 4.2.10 , and Section 4.2.11 .
17-3	Draft EIS does not address land use conflicts if the property is kept industrial.	Section 3.8 Land & Shoreline Use discusses land use compatibility impacts under all alternatives including No Action.
17-4	Draft EIS does not analyze if this area is well suited for industrial use under City and VISION 2050 criteria.	Section 3.8 Land & Shoreline Use discusses consistency of alternatives with City and regional policies, as well as land use compatibility impacts
17-5	Draft EIS fails to analyze the impact on loss of multimodal transit, and the climate implications.	See response to comment 16-5.
17-6	Air quality, noise pollution, and environmental justice issues are not addressed in the context of this property.	See response to comment 16-6.
17-7	Consider environmental and stormwater impacts if redevelopment does not occur at 900 Poplar Place S.	Additional text has been added to Section 3.3.2 to reflect stormwater requirements, in general, for industrial parcels that do not redevelop (Section 3.3 Water Resources).
17-8	City must take the climate and housing crisis seriously when drafting these policies. The Judkins Park area is not suited for industrial uses.	Comment is noted and forwarded to City decision makers. The EIS recognizes climate change as one of the six key emerging factors affecting Seattle's MICs and addresses various climate change related impacts (sea level rise, increased floods, extreme heat) in

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		the analysis. Section 3.9 Housing address nousing impacts and proposed mitigation. The Preferred Alternative would allow for mixed use housing in Judkins Park.
18	Clawson	AnMarCo
18-1	Appreciate the opportunity to comment. Submitting on behalf of AnMarCo who own property at 2130 Harbor Ave SW (“Pier One” property zoned IG2 in the Duwamish MIC). Draft EIS should study taking this property out of industrial zoning or rezoned IC because of specific conditions.	Thank you for your letter. The comment is noted and forwarded to City decision makers. See Section □.
18-2	Pier One property does not meet the criteria of “industrial land” defined in VISION 2050, the King County CPPs, and the City’s own criteria.	Consistency of alternatives with city and regional policies is discussed in Section 3.8 Land & Shoreline Use .
18-3	Any jobs analysis that includes contribution from the Pier One property is faulty. The property has not created any jobs in 30 years.	Employment growth projections are for aggregated areas and specific quantities are not attributed to individual parcels. The overall quantity of redevelopable parcels in a subareas is one factor in the employment growth projections model.
18-4	Draft EIS does not consider changes that would need to be made to the shoreline environments to achieve any of the proposed alternatives for properties in the shoreline.	See minor revision to Section 3.4.3 acknowledging that development within the shoreline would need to comply with existing federal, state, and local regulations. The EIS lists relevant statutes and agencies (Exhibit 3.4-3). The degree of difficulty relating to industrial development depends greatly on the individual project and would be addressed during environmental review and permitting at the project level.
18-5	Consider the economic impacts of leaving Pier One property in the MIC and zoned industrial, including blight. Consider the environmental impacts associated with properties staying in the MIC and remaining undeveloped.	SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). See Section 4.2.1 . Additional text has been added to Section 3.4.2 addressing impacts of failure to redevelop properties that have existing environmental impacts. See Section 3.4 Plants & Animals .
18-6	Consider the visual and aesthetic/view impacts of leaving Pier One property in the MIC and zoned industrial. Harbor Avenue SW is a designated SEPA view corridor.	Please see the discussion of scenic routes and the alternatives in Section 3.7 Light & Glare . The view from parks and view corridors in the West Seattle Area is addressed in the discussion of the SODO/Stadium Subarea under each alternative, including the Preferred Alternative.
18-7	Pier One property contains environmental contamination. Property will not be cleaned up if remains in the MIC and zoned industrial.	Comment is acknowledged. See response to comment 16-5 regarding the appropriate level of analysis completed under this EIS. For contaminated sites with current industrial land use designations that maintain an industrial focus under new land use designations, cleanup will not likely happen until redevelopment occurs, or there is a property sale that triggers site characterization and remediation activities to secure financing. Added text to this effect to Section 3.5 Contamination .
18-8	Consider the land use conflicts of leaving Pier One property in the MIC and zoned industrial.	Section 3.8 Land & Shoreline Use discusses land use compatibility.
18-9	Existing over-water structure at Pier One has negatively impacted the shoreline environment since 1905.	The non-project EIS considers future development allowed under the No Action Alternative as well as action alternatives and associated policies and regulations. With development or redevelopment, modern regulations addressing shorelines, stormwater, etc. could apply under any alternative. Section 3.4.2

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		has been clarified regarding detrimental impacts on existing properties prior to redevelopment across the study area.
18-10	Pier One property does not have stormwater infrastructure on-site. Impact will remain without redevelopment.	See Section 3.3.2 which is clarified in the Final EIS to reflect stormwater requirements, in general, for industrial parcels that do not redevelop (Section 3.3 Water Resources). These sites would still be required to implement stormwater source control measures, even if no redevelopment occurs.
19	Daniels	First and Utah Street Associates, LLC
19-1	Appreciate the opportunity to comment. First & Utah has deep roots in SODO and owns several properties in the area.	Thank you for your letter. The comment is noted and forwarded to City decision makers.
19-2	Support the II zone. Preferred Alternative should support legacy businesses near light rail investments and allow for modern industrial uses with an expanded and modified II zone.	The comment is noted and forwarded to City decision makers. See response to comments 19-3 through 19-9 below.
19-3	Maximum height limit in the II zone should be increased to a minimum of 180' to allow for innovative and sustainable mass timber construction types.	The comment is noted. A maximum height of 160' is studied for the II zone and could accommodate mass timber construction. See Section 2.4.2 and Appendix G .
19-4	Maximum FAR in the II zone achievable via the mixed development bonus program should be increased to at least 6-7 FAR to allow buildings to achieve the increased maximum height limit by stacking density to provide needed accompanying amenities.	The comment is noted. A maximum FAR of 6.0 is studied for the II zone. See Section 2.4.2 and Appendix G .
19-5	List of industrial uses in the current code should be used as the basis for uses qualifying for the mixed development bonus program in the II zone.	The comment is noted. Additional information regarding qualifying and bonus allowable uses in the II zone is provided in the Final EIS in the development standards Appendix G .
19-6	City should set rules around ancillary uses in the II zone that look at several factors like the actual function of spaces, use of technology, and the overall purpose of the business in a space (rather than just size of uses).	The comment is noted and forwarded to City decision makers.
19-7	City should publish the Joint Director's Rule contemplated by SMC 23.52.004.B. so that property owners can properly evaluate the available mitigation measures to help achieve the 51% SOV goal in the Duwamish MIC and similar areas.	The comment is noted and forwarded to City decision makers.
19-8	Retain the general exemption from design review in most industrial zones and extend this exemption to the II zone.	The comment is noted and forwarded to City decision makers. No expansion of design review to industrial zones is proposed.
19-9	Preferred Alternative zoning map should be amended to apply the II zone to all of First & Utah's property within a half mile of light rail.	The comment is noted and forwarded to City decision makers. Different alternatives include varying geographies for the II zone including coverage of noted properties.
20	Ffitch	BNSF Railway Company, Freezer Longline Coalition, ILWU Local 19, Inlandboatmen's Union of the Pacific, Manufacturing Industrial Council, North Seattle Industrial Association, Pacific Merchant Shipping Association, Port of Seattle, Puget Sound

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<p>Pilots, Seattle Marine Business Coalition, The Northwest Seaport Alliance, Transportation Institute, Vigor, Washington Maritime Federation, Port of Seattle, Puget Sound Pilots, Seattle Marine Business Coalition, The Northwest Seaport Alliance, Transportation Institute, Vigor, Washington Maritime Federation</p>		
20-1	Support Alternative 2.	Thank you for your letter. The comment is noted and forwarded to City decision makers.
20-2	<p>(1) Document needs to address freight. Can the City engage the Freight Board to ensure that freight concerns are reflected in the final document?</p> <p>(2) Address mobility concerns between major truck streets and the connections to business driveways.</p> <p>(3) Final EIS must differentiate between car vs truck safety and discuss safety issues posed by sight distance and turning radius conflicts between heavy trucks and bicycles and pedestrians.</p>	<p>(1) The Final EIS has been reorganized to include freight as a separate section with additional information.</p> <p>(2) The Final EIS has been reorganized to include freight as a separate section including the commenter’s concerns about existing mobility challenges between major truck streets and the connections to business driveways.</p> <p>(3) Language distinguishing between the safety risks of cars and trucks was included in the Draft EIS (p. 3-388) and is retained in the Final EIS. Supplemental language has also been added in the Final EIS per the commenter’s suggestion regarding truck drivers’ limited range of sight distance and turning radii conflicts.</p>
20-3	City must adopt policies and regulations that implement elements of Alternative 2 to promote diversity of economic opportunity, as is represented by industrial jobs.	<p>The comment is noted and forwarded to City decision makers. The EIS recognizes equity and accessibility as one of the six key emerging factors affecting Seattle’s MICs, specifically access to maritime and other industrial career opportunities for BIPOC and women. Maintaining a strong industrial economy is a prerequisite to providing these opportunities, but other non-land use strategies including outreach to BIPOC youth and workforce training investments are key parts of the Industry and Maritime Strategy outside of topics required to be analyzed in this EIS under SEPA. The EIS estimates employment growth including estimation of the proportion of employment industrial and non-industrial categories.</p>
20-4	Final EIS should affirm that increased density in current residential areas is preferable to bringing new residents into and alongside the MICs.	<p>Comment is noted and forwarded to City decision makers. Consistent with the PSRC criteria for designating MICs to focus industrial uses in the MIC, the EIS does not study allowing residential uses in the majority of the study area. Alternatives 3 and 4 consider limited additional flexibility of existing allowances for caretakers’ units and artist/studio quarters in the proposed UI zone only. The Preferred Alternative limits housing growth to less than Alternative 4.</p>
21	Fu	NAIOP Washington State
21-1	Final EIS should consider the Port of Seattle and Boeing Field as separate industrial uses, delineate between industrial and uses that are heavy commercial or commercial, and acknowledge vacant or interim-use industrial buildings. Should also more robustly study the No Action Alternative.	Thank you for your letter. Section 3.8 Land & Shoreline Use includes an analysis of existing land use, including narrative descriptions of subarea land use patterns under existing conditions.
21-2	Existing code-based definition of "industrial use" is out of date.	The EIS considers three proposed new industrial zones based on community input that are intended to respond to issues, challenges, and opportunities for the maritime and industrial sectors and adjacent communities (MML, II, and UI zones). The action alternatives apply these proposed “future of industry” land use concepts to the city’s industrial areas. The EIS will eventually

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		help the City develop a proposal that will identify specific zone standards including uses.
21-3	Draft EIS fails to address that many industrially zoned areas in Seattle have few industrial uses.	Section 3.8 Land & Shoreline Use includes an analysis of existing land uses.
21-4	Draft EIS fails to address that many industrially zoned areas in Seattle have few industrial uses.	Section 3.8 Land & Shoreline Use includes an analysis of existing land use.
21-5	Draft EIS does not analyze the relationship between future light rail service and industrial zoned land with non-industrial uses impact on TOD.	The EIS alternatives include a range of additional employment densities at existing and future light rail stations with a focus on a land use concept of transit-oriented employment or industrial TOD (see also Objective F of the proposal). The II land use concept is intended to support economic innovation and capitalize on emerging opportunities including expanded or new light rail stations in industrial areas. Section 3.8 Land & Shoreline Use discusses the relationship of likely future land use with future light rail stations under each alternative.
21-6	Support continuing to not require design review in industrial areas.	The comment is noted and forwarded to City decision makers. No expansion of design review to industrial zones is proposed.
21-7	Final EIS should study increased density for all II zoned property near future and current light rail stations with height limits increased to 180'.	Comment is noted. II zones are studied in alternatives in varied geographies near future light rail. Height limits up to 160' are studied. See Section 2.4.2 and Appendix G .
21-8	Limiting future removal of land in the MIC and BINMIC to every 8 years is onerous.	The comment is noted and forwarded to City decision makers.
21-9	Permitted light industrial uses need to be broader and more flexible.	Additional information about specific uses qualifying as industrial is included in the development standards Appendix G in the Final EIS. A new definition for Information Computer Technology (ICT) is proposed and would be eligible as an industrial use in the II zone.
21-10	Final EIS should explore alternatives that study: all urban industrial lands with residential allowances of Seattle Mixed Use zoning; Interbay and non-water dependent Ballard land within BINMIC as II; Interbay and non-water dependent Ballard land within BINMIC as UI; adding all non BINMIC Ballard lands as Seattle Mixed Use zoning; adding all non BINMIC Ballard lands as UI with housing option; adding land around Lake Union, outside of the BINMIC as II, UI, and Seattle Mixed; and the impact of removing non-industrial limitation caps in UI zones.	The comment is noted and forwarded to City decision makers. The EIS studies a range of varied patterns of the proposed UI and II zones. Different alternatives feature varied allowances for housing within the UI zone. See Section 4.2.10 .
21-11	Believe the current EIS falls short of analyzing several key components necessary for a comprehensive study of Seattle's industrial lands to be accurate and inform new zoning and land use codes.	The comment is noted and forwarded to City decision makers. See response to comments 21-1 through 21-10 above.
22	Gering	Manufacturing Industrial Council
22-1	The Draft EIS presents an opportunity for the City to build on success of an industrial career learning initiative already in place and ready to grow in the Seattle Public Schools.	Thank you for your letter. The comment is noted and forwarded to City decision makers. See response to comments 22-2 through 22-9 below.

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22-2	<p>Requests a meeting with the Mayor and his staff team regarding the opportunity to incorporate the Seattle Public Schools into the Seattle Industrial Maritime Strategy.</p> <p>Agree with letters submitted by the Seattle Freight Advisory Board and the Port of Seattle. Specific concerns with the significant increases in residential and worker populations under alternatives 3 and 4.</p>	<p>The comments are noted and forwarded to City decision makers.</p>
22-3	<p>Draft EIS fails to account for aging infrastructure, including updates needed to accommodate increased truck and rail traffic and potential impacts of a major earthquake.</p>	<p>Section 3.10.1 Transportation identifies the City's Transportation Capital Improvement Program which include developing, maintaining, and operating Seattle's transportation system including truck and freight as well as roads and bridges.</p> <p>During an earthquake, vertical and lateral displacements of structures, embankments, and paved areas might occur due to seismic liquefaction hazard. The liquefaction potential of mapped liquefaction hazard areas would be confirmed during the design stage of proposed development, regardless of the alternative (see Section 3.1 Soils/Geology). Text was added to Section 3.1.2 Impacts describing how structures, all water, wastewater, transportation, and other infrastructure associated with new development and redevelopment would be carefully designed with input from site-specific geotechnical investigations to lessen and withstand the effects of earthquakes and liquefaction.</p> <p>The City of Seattle maintains a Comprehensive Emergency Management Plan (CEMP) which unifies a series of all-hazards documentation to holistically describe the doctrines, strategies, and responsibilities through which the City of Seattle's emergency management system is organized and managed. In addition, the City's Disaster Recovery Framework addresses how the City would partner with the community and coordinate with County, State, and Federal agencies in recovering from the effects of disaster using a massive earthquake as the premise.</p>
22-4	<p>Draft EIS should more fully address climate concerns, including conflicts with residential uses from noise and light impacts.</p>	<p>As discussed in WAC 197-11-440, this non-project EIS is limited to a general discussion of the impacts of alternate proposals for policies contained in the proposed Industrial and Maritime Strategy. The City of Seattle concluded that as proposed, the alternatives would not prevent or deter efforts to reduce emissions in comparison to local or regional goals or targets for GHG reductions. See Section 3.2 Air Quality & GHG.</p> <p>The current level of analysis provides an appropriate level of detail for a non-project EIS. Subsequent developments that may arise from the proposed land use changes in the Industrial and Maritime Strategy will be required to meet all applicable codes and regulations, and to conduct project-level SEPA review at that time, in which analysis will be conducted to assess site specific impacts and necessary mitigation measures, including for climate change related issues.</p> <p>See Section 3.6.2 for a discussion of potential impacts associated with the location of noise sensitive receivers like residential uses near industrial or traffic noise sources under all alternatives, particularly alternatives 3 and 4 and the Preferred Alternative. The City of Seattle concluded that as proposed, implementation of the prescribed residential noise mitigation in general should</p>

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		<p>adequately reduce noise experienced by noise sensitive receivers. It is beyond the scope of this analysis to speculate about specific potential complaints or remedies.</p> <p>The current level of analysis provides an appropriate level of detail for a non-project EIS. Existing operations and subsequent developments that may arise from the proposed land use changes in the Industrial and Maritime Strategy are or will be required to meet all applicable codes and regulations, and to conduct project-level SEPA review at that time, in which analysis will be conducted to assess site specific impacts and necessary mitigation measures, including for noise.</p> <p>See Section 3.7.2 for a discussion of potential impacts and mitigation measures associated with light and glare. Future development could generate at least some increase in light and glare, but these effects can be minimized and reduced through application of design standards and the mitigation measures addressing placement, light output, direction, and shielding of any exterior illumination above a given height to reduce light and glare emissions to adjacent non-industrial areas.</p>
22-5	Increased traffic will result in increased non-point source stormwater pollution from roadways with no mitigation offered in the Draft EIS.	Section 3.3.2 discusses the expected increase in traffic for all alternatives and states that improvements in vehicle standards and the application of stormwater requirements during redevelopment described in this and other sections of the EIS are expected to offset the increase in traffic and potentially lead to a net decrease in surface water pollution.
22-6	Industrial soil cleanup levels cannot be applied in areas near residential and other vulnerable populations. Parcels cleaned up to industrial standards must have a wide buffer zone and be protected from upzoning in the future.	As described in Section 3.5 Contamination , site characterization and remediation occur on a site-specific basis and the cleanup standards applied under MTCA are tied to the current land use. However, as described in Section 3.8 Land & Shoreline Use , one of the goals of the City of Seattle 2035 Comprehensive Plan is to develop better transitions between industrial areas and adjacent neighborhoods that support healthy communities, reduce adverse environmental impacts, and minimize land use conflicts.
22-7	Request the Mayor engage in Core Plus career learning opportunities at Seattle schools. Believe a leadership intervention is necessary to achieve stakeholder goals for more equitable access to high-wage industrial careers.	Comment is noted and request is forwarded to the mayor’s office. Non-land use actions outside the scope of what is required to be analyzed under SEPA are being pursued in parallel with the proposed action. This includes workforce development and career pathway efforts largely led by Seattle’s Office of Economic Development (OED).
23	Gilder	Gilder Office for Growth, LLC
23-1	Endorse comments in letter 34.	Thank you for your letter. The comment is noted and forwarded to City decision makers. See responses to letter 34.
24	Gillespie	Lander Street Partners, LLC
24-1	Alternatives do not provide incentive for industrial development, TOD, or large scale redevelopment of existing structures.	Thank you for your letter. The comment noted and forwarded to City decision makers. The II zone includes significantly increased development capacity and flexibility compared to existing IG zoning standards. In response to comments II standards under the Preferred Alternative are modified to provide additional incentive. See development standards Appendix G .
25	Gillespie	Hess Callahan Grey

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25-1	Appreciate the opportunity to comment. Submitting on behalf of Hess Callahan Grey who develop and manage properties in Fremont's industrial areas.	Thank you for your letter. The comment is noted and forwarded to City decision makers.
25-2	Wallingford, UW MIO, and Silicon Canal area in Fremont should be considered uniquely from the Ballard Subarea.	Unique land use conditions in Fremont and other noted areas are described in Section 3.8 Land & Shoreline Use . The Preferred Alternative applies an approach that is distinct from the Ballard areas, since the alternative proposes to retain Industrial Commercial zones for the geography noted in the comment. See Chapter 2 and Appendix C maps.
25-3	Silicon Canal area in Fremont should be considered separate from the Ballard Subarea.	See response to comment 25-2 above.
25-4	Proposal is not adequately defined. No SEPA review draft ordinance published by OPCD.	This is a programmatic level EIS. Sufficient detail about the proposed development standards to fully consider the potential for environmental impacts is included (see Section 2.4.2). The Draft EIS includes sufficient detail about proposed development standards and potential zoning changes to understand the scale and physical characteristics and likely use patterns from the development that would occur. It is not possible to predict the exact features of new development over a future 20-year time horizon on a wide range of sites and geographic areas. Additional detail beyond the level that would be required for a programmatic EIS is included about fine-grained development standards in this Final EIS. In association with the Preferred Alternative, detail about development standards is included in Appendix G , which are similar to the Draft EIS action alternative concepts.
25-5	Selection of alternatives does not highlight the environmental impacts of any proposed action and limits the choice of reasonable alternatives Council can consider.	Per WAC 197-11-442, a non-project EIS is "not required under SEPA to examine all conceivable policies, designations, or implementation measures but should cover a range of such topics." The alternatives include a range of different geographic patterns of proposed zoning designations. Development standards are also varied between alternatives. Action alternatives are compared to a No Action Alternative.
25-6	Draft EIS does not analyze if the market will support any development under UI size-of-use limits.	The comment is noted is forwarded to City decision makers. See Section 4.2.1 .
25-7	Draft EIS does not meaningfully analyze the interplay between the Action Alternatives and the Shoreline Master Program.	Section 3.8 Land & Shoreline Use discusses the interplay between proposed development standards and Shoreline Master Program regulations.
25-8	Draft EIS is inadequate because it needs a clear proposal and unique consideration of the Silicon Canal.	See response to comments 25-2 through 25-7 above.
26	Goodman	SODO BIA
26-1	Transportation section is missing the subject of freight including trucks and rail. Include truck and rail existing conditions, future no action, and future action conditions. Include relevant basis for analysis from the City of Seattle Freight Master Plan. Include potential future operating policies on rail lines	Thank you for your letter. The Final EIS has been reorganized to include freight as a separate section with additional information. Future operating policies on privately operated rail lines (for example, train speed, train horn noise, blocked/occupied at-grade rail crossings) is not within the purview of the City and this EIS.

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26-2	<p>(1) Final EIS should present daily trips generated by the alternatives and the subsequent mode split throughout the day.</p> <p>(2) Final EIS should present the changes in daily and PM peak hour traffic on study area streets.</p> <p>(3) Final EIS should present extent of peak hour spreading and show the daytime peak hour.</p>	<p>(1) A trip summary table including daily trips and a more detailed breakdown of mode split has been added to the Final EIS.</p> <p>(2) A table showing the number of vehicles expected to cross each studied screenline during the PM peak hour has been added to the Appendix I of the Final EIS, consistent with methodology from a prior Comprehensive Plan. However, it should be noted the travel time on individual roadways was used as the main indicator of congestion. That analysis indicated conditions would generally be LOS E and F in the SODO area with slightly higher travel times (i.e., more congestion) under the action alternatives because of higher vehicle trip generation.</p> <p>(3) As disclosed in the EIS, peak spreading is expected to occur in locations that are already at capacity. There is an inherent congestion impact when traffic demand exceeds available capacity and the precise duration, while informative, would not change the identification of an impact.</p>
26-3	Document should prepare text describing the operating conditions for each level of service.	Text qualitatively describing the operating conditions for each level of service has been added to the Final EIS.
26-4	Document should analyze impact of daily traffic generated by alternative conditions, midday conditions, and peak hour spreading.	See response to comment 26-2 regarding daily traffic and peak hour spreading. See response to comment 4-27, part 3 regarding analysis period.
26-5	<p>(1) Document should present rail operating conditions, operating policies, frequency, and length of time streets are blocked during daytime and PM peak hour conditions. Present existing conditions data for queuing and delays when streets are blocked, and future conditions that could occur through railroad action.</p> <p>(2) Future No Action should disclose the status of Holgate being removed for general-purpose traffic by the railroad.</p>	<p>(1) The Final EIS provides additional information about rail conditions in the study area.</p> <p>(2) The City is in communication with railroad operators regarding their future operational plans and how they could affect City roadway operations. This includes discussion of potential changes at the Holgate Street crossing. Should changes at Holgate Street move forward, SDOT will conduct a study of potential impacts to the area.</p>
26-6	<p>(1) Final EIS does not state embedded assumption that for alternatives 3 and 4, employees are traveling to work by transit, walking, or biking.</p> <p>(2) Final EIS should discuss relevant conditions and traffic impacts in MICs before full buildout of Sound Transit Phase 3.</p> <p>(3) Provide existing conditions information on various business in the MIC and their typical working hours for employees; acknowledge unique challenges of using transit for commercial and industrial businesses in the MIC.</p>	<p>(1) The model does not assume that employees are only arriving by transit, walking, or biking. A trip summary table with a more detailed breakdown of vehicle trip growth and mode split has been added to the Final EIS.</p> <p>(2) Text has been added to the Final EIS qualitatively addressing how interim conditions may compare to the EIS 2044 horizon year.</p> <p>(3) Draft EIS page 3-366 includes a text box titled Travel Patterns of Industrial Workers which includes statistics about the geographic distribution of study area workers and acknowledges that accessing transit may be a challenge due to the availability and convenience of the transit service.</p>
26-7	Document should add personal safety for transit riders in the safety section.	Personal safety at transit stops is not expected to be adversely impacted by the action alternatives and could potentially result in a safety benefit by concentrating more land uses and activity near transit stops, i.e., more “eyes on the street” as the comment states. This concern among MIC employees has been added to the Travel Patterns of Industrial Workers text box as an additional existing challenge to transit use.

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26-8	Final EIS should acknowledge the need for parking along street frontages and the limitations of a qualitative parking analysis.	The EIS includes a Parking impacts section describing the competing needs for public curb space and acknowledges that the action alternatives are expected to result in significant adverse impacts to on-street parking absent mitigation measures. This programmatic EIS addresses area-wide land use zoning changes, rather than a project-specific proposal. The proposal may result in a wide range of individual projects implemented over a long timeframe and across a large geographic area. Because the specific locations and sizes of development are unknown at this time, it would be speculative to quantify parking demand in a particular location. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation (including on-street parking) will be determined.
26-9	Final EIS should include an equity analysis focused on the quality of employment and access to that employment by alternative.	The EIS recognizes equity and accessibility as one of the six key emerging factors affecting Seattle’s MICs, specifically access to maritime and other industrial career opportunities for BIPOC and women. Maintaining a strong industrial economy is a prerequisite to providing these opportunities, but other non-land use strategies including outreach to BIPOC youth and workforce training investments are key parts of the Industry and Maritime Strategy outside of topics required to be analyzed in this EIS under SEPA. The EIS estimates employment growth including estimation of the proportion of employment in industrial and non-industrial categories. Section 1.7.15 of the EIS is an equity and environmental justice review.
26-10	The transportation mitigation section is very general and not tangible to the average person.	This programmatic EIS addresses area-wide land use zoning changes, rather than a project-specific proposal. The proposal may result in a wide range of individual projects implemented over a long timeframe and across a large geographic area. Because the specific locations and sizes of development are unknown at this time, the specific mitigation projects that will be required are also unknown. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation will be determined.
26-11	Document should acknowledge that standards should be developed for industrial and maritime uses; there is risk in approaching the standard primarily for pedestrians and cyclists.	If new zoning designations are adopted, SDCI will work with SDOT to develop updates to the Streets Illustrated manual reflecting street design standards tailored to the industrial context and level of expected pedestrian and bicycle activity. Updates will consider street typologies and design standards that can accommodate both freight activity and non-motorized uses with a focus on reducing potential conflicts.
26-12	Document should provide text that acknowledges the parking and vehicular curbside access needs for commercial and industrial uses in mitigation section.	The parking and curbside access needs findings from the Impacts section has been summarized at the beginning of Parking Strategies in Section 3.10.3 Mitigation Measures in the Final EIS. The SDOT Curbside Management Team actively identifies and installs commercial vehicle and general load unload zones in business districts throughout Seattle and would identify load zone needs with new development as needed or requested by development projects. SDOT is also working on potential policy changes to more actively install load zones and other curb access needs at new development during the City development review process.

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26-13	<p>(1) Clarify intent of “proximity to a light rail station—Industry & Innovation”</p> <p>(2) In “Regulations and Commitments” section, TSMO, TDM, and Parking Strategies are system management, not mitigation.</p> <p>(3) Prepare text that acknowledges the deteriorating conditions in the No Action alternative. Describe programmed projects that would mitigate future No Action conditions.</p>	<p>(1) The bulleted list on page 3-419 of the Draft EIS summarizes the transportation-related aspects of the proposals, i.e., that the II land use concept would be located within close proximity to light rail stations, making travel by transit more convenient. The sentence that precedes that list has been clarified in the Final EIS.</p> <p>(2) Section 3.10.3 Mitigation Measures proposes a variety of strategies, not solely limited to street infrastructure. TSMO measures would mitigate traffic congestion impacts identified in the EIS by better operating the City’s existing infrastructure and systems. TDM measures would mitigate traffic congestion impacts identified in the EIS by lowering the vehicle demand on the network. Parking Strategies in Section 3.10.3 Mitigation Measures describe the way the City can manage the public curbspace to meet competing demands for its use.</p> <p>(3) See page 4-416 of the Draft EIS for a discussion of conditions under the No Action Alternative and the purpose of this programmatic EIS: <i>“The purpose of this EIS is to disclose how potential actions by the City may impact the transportation system in comparison to what is expected to occur with currently adopted zoning codes and development standards. Therefore, the impacts of the Action Alternatives are assessed against Alternative 1 No Action. Impacts identified under Alternative 1 No Action would remain throughout the Action Alternatives even if those alternatives would not result in additional impacts. While the focus of the EIS is not to mitigate conditions under the currently adopted zoning code and development standards (i.e., Alternative 1 No Action), many of the mitigation measures identified for the Action Alternatives would also benefit conditions under Alternative 1 No Action.</i></p> <p><i>In summary, Alternative 1 No Action is expected to have significant impacts to active transportation, auto, and freight in terms of travel time, mode share, transit, parking, and safety.”</i></p>
26-14	<p>(1) Include temporary traffic signal at Forrest/4th Ave S as potential mitigation.</p> <p>(2) Add mitigation measure to improve personal safety of transit riders.</p>	<p>(1) The commenter’s request for a signal at the Forrest/4th Ave S intersection is noted. The City does not anticipate installing a signal in the near term, but will continue to monitor the location to determine if it meets a signal warrant in the future.</p> <p>(2) See response to comment 26-7.</p>
26-15	<p>Comments and requests for additional methodology, data, analysis of impacts, and mitigation are based on the missing information relative to the unique needs of commercial and industrial land uses in the Greater Duwamish MIC.</p>	<p>The comment is noted. See response to comments 26-1 through 26-14 above.</p>
26-16	<p>Include daily trips generated by the alternatives and mode split in absolute numbers, changes in daily and PM peak hour traffic on streets in the study area, and the extent of peak hour spreading.</p>	<p>See response to comment 26-2.</p>
27	Horn	MAK Management, LLC
27-1	<p>General background on MAK Management, LLC and the properties they represent.</p>	<p>Thank you for your letter. The comment noted and forwarded to City decision makers.</p>
27-2	<p>Development standards aren’t fully disclosed in the Draft EIS.</p>	<p>This is a programmatic level EIS. Sufficient detail about the proposed development standards to fully consider the potential for</p>

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		<p>environmental impacts is included. The Draft EIS includes sufficient detail about proposed development standards and potential zoning changes to understand the scale and physical characteristics and likely use patterns from the development that would occur. It is not possible to predict the exact features of new development over a future 20-year time horizon on a wide range of sites and geographic areas. Additional detail beyond the level that would be required for a programmatic EIS is included about fine-grained development standards in this Final EIS. Detail about development standards is included in Appendix G.</p>
27-3	No development feasibility analysis is included in the EIS.	The comment noted and forwarded to City decision makers. See Section 4.2.1 .
27-4	Supports zoning that would allow stacked mixed uses.	The comment is noted. The proposed UI zone would allow mixing of uses, and would allow large allowances for ancillary office and other non-industrial uses if affiliated with an industrial operation. The II zone would encourage investment in non-industrial uses if mixed in a development with light industrial uses. Overall development capacity in both zones would be increased compared to existing regulations in the Industrial General and Industrial Buffer zones.
27-5	Ancillary brewing/tasting rooms should be allowed on adjacent or other sites.	The comment is noted and forwarded to City decision makers. The Final EIS includes additional detail about development standards in Appendix G . In response to this comment Appendix G describes an allowance for ancillary brewing/tasting rooms to be located off-site within the same MIC.
27-6	Proposed size of use limits are too small.	See response to 27-5. See Section 4.2.2 concerning non-conforming uses. In the UI zone standards allow large ancillary spaces. In the II zone bonus non-industrial spaces would not be subject to a maximum size of use limit.
27-7	The suggested 1/1000 maximum parking limit for the II zone will create significant impacts for non-industrial uses away from transit.	<p>The Draft EIS identified potential significant adverse impacts to on-street parking under all alternatives (p. 3-386). Decisions on the use of any particular flex zone (i.e., whether it's used for freight loading, passenger loading, bus stops, parking, etc.) will be made by SDOT depending on the specific context of the block face, including needs of adjacent land uses and the transportation activity/network in that location.</p> <p>However, the City also has a variety of strategies available to mitigate these potential impacts—see Parking Strategies in Section 3.10.3 Mitigation Measures. Other strategies such as travel demand management, continued expansion of transit service, and improvements to active transportation modes will also provide more travel options for people traveling to and from the study area. With a combination of those approaches tailored to each specific location's needs, it is expected that parking impacts could be brought to a less-than-significant level.</p>
27-8	The EIS does not assess how proposed maximum size of use limits in the MML zone would affect surrounding areas with respect to creating more demand for office and other uses.	The comment noted and is forwarded to City decision makers. Section 3.8 Land & Shoreline Use includes analysis of transitions impacts, which addresses potential for impacts on adjacent areas. If size of use limits caused increased demand for non-industrial uses such as offices in other areas that are zoned for offices and non-industrial uses, this would not be considered an adverse impact. Additionally, the proposal creates new development

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		capacity under the action alternatives for offices, especially in the II zone, that could receive demand for offices.
27-9	Final EIS should assess how frontage and landscaping improvements might impact freight mobility.	As the commenter notes, frontage and landscaping requirements may result in a change of use in public rights-of-way that were previously used for informal parking and/or loading. This is disclosed in the Parking impacts section on p. 3-386 of the Draft EIS. The commenter's suggestions regarding modifications to those requirements to maintain freight mobility are noted. Additional detail on proposed frontage and landscaping requirements is included in the Final EIS in the development standards Appendix G . Standards vary between the proposed zones with higher requirements in the II and UI zones, and lesser requirements in the MML zone. If new zoning designations are adopted, SDCI will work with SDOT to develop updates to the Streets Illustrated manual reflecting street design standards tailored to the industrial context.
27-10	Do not add design review. Consider a TDR program within the BINMIC for industrial uses.	No expansion of design review into industrial areas is proposed. Comment noted.
27-11	Concern that non-conformities will be caused in the MML zone. Consider amending the substantial alteration thresholds.	See response to frequent comment themes concerning non-conforming uses in Section 4.2.2 . The development standards appendix includes additional detail, including a paragraph addressing potential amendments to the substantial alteration threshold (Appendix G).
27-12	Concern about creation of non-conforming uses and structures.	Comment noted. See response to frequent comment themes concerning non-conforming uses.
27-13	City should delay implementation of the proposal and Final EIS until Sound Transit selects the route for the planned light rail extension into Ballard.	Comment noted. See Section 4.2.4 concerning coordination with Sound Transit.
27-14	Information about sub-area planning was not included.	See responses to comments 6-2 and 6-4.
27-15	Study removing more land from MICs.	See Section [] regarding MIC boundaries.
27-16	Study different zoning options for the areas zoned IB and IC in west Ballard along Market Street.	Comment is noted. The Preferred Alternative includes a different zoning designation for these areas compared to Draft EIS alternatives, converting a portion of it to a mixed-use (NC-75) zone in that alternative.
27-17	Property specific comment for 21 st Ave W, North of W Emerson Place and South of Commodore Way	Comment noted. See Section 4.2.2 concerning non-conforming uses and other responses to this letter.
27-18	Property specific request for 2715 W Fort St,	Comment noted. See Section 4.2.2 concerning non-conforming uses and other responses to this letter.
27-19	Property specific request for North side of NW 53rd St, Between 15th Ave NW and 14th Ave NW, 98107	Comment noted. The location is zoned II under multiple alternatives including the preferred alternative. Information on proposed development standard is included in the appendix.
27-20	Property specific request for 5010-5014 14th Ave NW, 98107	Comment noted. The location is zoned II or UI under multiple alternatives. Information on proposed development standards is included in Appendix G .
27-21	Property specific request for NW 50th and NW 52st between 14th Ave NW and 11th Ave NW	Comment noted. The location is zoned II or UI under multiple alternatives. Information on proposed development standards is included in Appendix G .

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27-22	Property specific request for 800 NW 46th St, 98107	Comment noted. The area is zoned UI in the Preferred Alternative. Information on proposed development standards is included in Appendix G .
27-23	Property specific request for NW Market St, 98107 west of 28th Ave NW	Comment noted. The Preferred Alternative includes this area in a mixed use (Neighborhood Commercial) zone.
27-24	The Proposal is a De Facto Zone Change and Must be Considered Together with the Specific Implementing Development Regulations	Detailed information about development standards is included in Appendix G . Sufficient information is present to fully understand the allowed scale, nature, and allowable uses in new development under the proposed zones. The Final EIS included added detail in the appendix in response to comment.
27-25	The “Action” or “Proposal” is not Sufficiently Defined to Allow Meaningful Environmental Review Because “Industrial” is not Defined	Comment noted. The Final EIS includes additional information and detail on proposed development standards, including a new table of uses with an indication of qualification as an industrial use (Appendix G). Sufficient information is provided to understand the potential for impacts under SEPA.
27-26	The Alternatives are not Reasonable because they are Inconsistent with the Locational Criteria and Proposed Policies (e.g. all alternatives designate land outside of MICs as MML, small parcels are MML, maps are not clear).	<p>The proposal is legislative and the City has flexibility in defining and evaluating non-project proposals (WAC 197-11-442). The City will consider public comments to shape the preferred alternative and final legislative proposals.</p> <p>The MML zone is conceptually identified in Section 2.4.1 and would apply to areas with established economic clusters and infrastructure or water. The MML zone would be commonly applied in areas currently zoned IG1/IG2 inside or outside of the MIC. The Preferred Alternative retains some existing zoning outside the MICs.</p> <p>A detailed zoning map proposal down to the parcel level is included for each alternative (Appendix C).</p>
27-27	The Draft EIS is Inadequate Because the Alternatives are not Adequately Segregated or Assessed for Each Sub-Area in the Study Area	A detailed zoning map proposal down to the parcel level is included for each alternative (Appendix C). Where feasible and practical impacts are summarized on a subarea level.
27-28	The Draft EIS Does not Adequately Consider Sound Transit’s Planned Ballard Light Rail Extension Project.	Comment noted see response to frequent comments concerning coordination with Sound Transit (Section 4.2.4).
27-29	The Draft EIS Does Not Adequately Assess Impacts on Land and Shoreline Use	Impacts in several impact categories are assessed in Section 3.8 Land & Shoreline Use .
27-30	The City Should Assess Purely Economic Impacts	Economic analysis is not required under SEPA. The City has considered economic information separately. See Section 4.2.1 .
28	Howard	Alliance for Pioneer Square
28-1	Submitting on behalf of Alliance for Pioneer Square. Appreciate the opportunity to comment and the objective to “promote mutually reinforcing mixes of activities at the transitions between industrial areas and urban villages or residential neighborhoods.” Encouraged by the City’s stated intent to work with owners or future owners of the WOSCA and Interbay Armory sites.	Thank you for your letter. The comment is noted and forwarded to City decision makers.
28-2	Tailor the UI zone to allow opportunity to use upper floors of the WOSCA site for industry supportive or work force housing while	The comment is noted and forwarded to City decision makers. The proposal includes a policy for site-specific master planning of the

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	encouraging new spaces for makers, artists, and other uses appropriate for transitional industrial sites.	WUSCA site. Unique development standards and approaches could be arrived at through that future process.
29	Johnson	Historic South Downtown
29-1	Appreciate the opportunity to comment. Changes in the Stadium/SODO area of the Duwamish MIC border and intersect Historic South Downtown's areas of concern, and specific definition of the different functions that industrial lands serve in Seattle could benefit these areas. The UI and II zones that would define a transition area along the west side of the stadium area and the south side of the CID have the potential to benefit the edges of both historic neighborhoods.	Thank you for your letter. The comment is noted and forwarded to City decision makers.
29-2	Requests that the city provide additional resources to the Pioneer Square Preservation Board to review changes to historic buildings for remaining industrial properties within the CID boundaries. City should prioritize retrofitting landmarked unreinforced masonry structures within SODO.	The comment is noted and forwarded to City decision makers. The study area does not include any land that is within the Pioneer Square or C/ID historic landmark districts.
29-3	For areas with increased residential units, the zoning should allow for provision of all services necessary for an increased residential population, particularly grocery stores and pharmacies located in reasonable walking or transit distances.	The comment is noted and forwarded to City decision makers. Commercial services would be allowed under proposed development standards in the UI zone up to maximum size of use limits, and in the II zone according to the incentive bonus development structure.
29-4	Requests additional information on the new II zoning area adjacent to C-ID, which should include an analysis of how increased need for housing, services and other zoning changes may affect the historic neighborhood.	Comment is noted. The II zone does not allow new housing development. Potential impacts on historic districts are discussed in Section 3.11 Historic, Archaeological, & Cultural Resources .
29-5	Pier 48 is currently omitted from the Draft EIS and should be addressed.	Pier 48 is not within the EIS study area. Potential for open space impacts to be addressed by future use of Pier 48 is included in Section 3.12 Open Space & Recreation, Mitigation Measures .
29-6	Would like to see mitigation recommendations for proactive survey on publicly-owned parcels of land, as well as on vacant lands, in the Duwamish MIC given the area's high potential for archaeological discovery.	Cultural resources review, including archaeological survey, is a process that is done prior to the start of many projects, and includes consultation with potentially affected Tribes. Many federal, state, and local statutes and ordinances require notice and consultation with affected Tribes before, during, and after project review. The National Historic Preservation Act (NHPA) of 1966, was amended in 1986 with provisions for consultation with affected Tribes and 1992 to include and clarify the roles and responsibilities of Indian Tribes in Section 106 reviews. All cultural resources survey and archaeological work will follow best practices and standard archaeological techniques in the discovery and preservation of cultural and historical artifacts. Any project with Federal funding, permits, or on federal or state lands, or that use State capital funds have some cultural resources survey and inventory requirements that must be satisfied before construction activities can begin. An Inadvertent Discovery Plan (IDP) typically accompanies a cultural resources survey and inventory

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		<p>report, which spells out the appropriate procedures to follow should an inadvertent discovery of cultural or archaeological resources occur.</p> <p>See also response to comment 1-4.</p>
29-7	<p>Final EIS would better serve its purpose with enhanced attention to specific equity and culture issues for areas adjacent to Pioneer Square and the CID.</p>	<p>Comment is noted. Section 1.7.15 includes a summary of race and social justice considerations. Other EIS sections including Section 3.8 Land & Shoreline Use integrate race and social justice analysis.</p>
30	Krohn	SMART Transportation Division, United Transportation Union
30-1	<p>Organization represents railroad workers with a substantially large workforce within the industrial areas of Seattle.</p>	<p>Thank you for your letter. The comment is noted and forwarded to City decision makers.</p>
30-2	<p>Do not agree with the proposed upzone of MIC lands currently zoned IG-2 in Georgetown to non-industrial mixed-use zones under alternatives 3 and 4.</p>	<p>The comment is noted and forwarded to City decision makers. Mixed use is considered in the Preferred Alternative too.</p>
30-3	<p>Rezoning to increased residential and mixed-use development near UP Track 101 lead spur would increase safety risks to the public and railroad employees.</p>	<p>Comment is noted. Additional discussion of potential impacts is added in the Final EIS for the relevant alternatives.</p>
30-4	<p>Upzoning area adjacent to the Track 101 rail spur would result in additional pressure on the carrier to consider the possibility of abandonment.</p>	<p>The comment is noted and forwarded to City decision makers. Additional discussion of potential impacts and mitigation measures are added in the Final EIS for the relevant alternatives. Note that the Preferred Alternative includes conditional use criteria for the location of housing, which could improve designs and configurations to minimize potential conflict between the track spur and new uses.</p>
30-5	<p>Greatest concerns center on any zoning changes near, adjacent to, or affecting Union Pacific's track 101 lead spur.</p>	<p>The comment is noted and forwarded to City decision makers. Additional discussion of potential impacts and mitigation measures is added in the Final EIS for the relevant alternatives.</p>
30-6	<p>Eliminating the track 101 spur would cut off south-end yard access to intermodal loading ramps 6-10.</p>	<p>See response to comments 30-2 through 30-5 above. The proposal does not include an action to eliminate the track 101 spur.</p>
30-7	<p>Eliminating the track 101 spur would cut off south-end yard access to intermodal loading ramps 6-10.</p>	<p>See response to comments 30-2 through 30-5 above. The proposal does not include an action to eliminate the track 101 spur.</p>
30-8	<p>Abandonment of the track 101 spur would increase and transfer risk to other public crossings and onto railroad operating crew employees.</p>	<p>See response to comments 30-2 through 30-5 above. The proposal does not include an action to eliminate the track 101 spur.</p>
30-9	<p>Proposals to add residential in the area should be reconsidered.</p>	<p>The EIS alternatives differ as to whether residential uses would be allowed near the location. Impacts and mitigation measures are discussed for the relevant alternatives.</p>
31	Lehmann	Industrial and Maritime Strategy Council
31-1	<p>Support zoning changes concentrated along major commercial thoroughfares and around existing and planned light rail hubs to permit a broader range of commercial activities and the development of limited workforce housing.</p>	<p>Thank you for your letter. The comment is noted and forwarded to City decision makers. Note the new zones, particularly II, is meant to provide additional mixed industrial/technology uses and employment density near light rail investments.</p>

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31-2	Proposal as-is will result in no meaningful change to the status quo in SODO and a wasted opportunity to leverage light rail investments.	The comment is noted and forwarded to City decision makers. See response to comment 31-1.
31-3	Most current zoning in SODO dates back to the 2000 Greater Duwamish MIC Plan.	The comment is noted and forwarded to City decision makers.
31-4	Challenges in SODO include escalating land value, sites that are not conducive to large-scale industrial uses, and existing land uses that are predominantly non-industrial.	The comment is noted and forwarded to City decision makers. See response to comment 31-1.
31-5	East/west congestion is a challenge in SODO. Lack of adequate street infrastructure results in increasing conflicts between bikes and freight/auto.	Section 3.10 Transportation includes analysis of transportation impacts including safety impacts. The roadway network is considered holistically including east–west connections.
31-6	Contamination in SODO can impose extraordinary costs on new development.	Contamination is analyzed in Section 3.5 Contamination . The effects of contamination on development potential are noted in Section 3.8 Land & Shoreline Use .
31-7	Industrial development cannot underwrite the significant cost of ground improvement and foundation systems in the liquefiable soils of SODO.	The effects of contamination on development potential are noted in Section 3.8 Land & Shoreline Use . See also Section 4.2.1 concerning development feasibility.
31-8	SODO is home to a significant number of unreinforced masonry buildings.	The comment is noted. Historic aged masonry structures are discussed in Section 3.11 Historic, Archaeological, & Cultural Resources .
31-9	Current zoning restrictions in SODO do not capitalize on light rail.	The comment is noted. The proposal includes varied potential zoning changes in action alternatives intended in part to improve land use integration with transit.
31-10	Protective zoning in SODO precludes uses and development that can support new capital investment.	The comment is noted. See also response to Section 4.2.10 and □.
31-11	Lack of new office sites in Center City Seattle and the upcoming light rail expansion present an opportunity for SODO to help alleviate regional challenges.	The comment is noted. The proposal includes varied combinations of potential zoning changes in action alternatives that would allow for expanded capacity for office development in the II zone.
31-12	Little reinvestment expected in SODO with commercial FARs remaining so low.	The comment is noted and forwarded to City decision makers.
31-13	Expand EIS study to include greater commercial density and workforce housing and prove that concepts like II zones exist elsewhere.	The comment is noted and forwarded to City decision makers. See also Section 4.2.10 and □
31-14	Key to SODO’s future is to attract capital investment that will support long-term industrial uses and address challenges of the area.	The comment is noted and forwarded to City decision makers.
31-15	Request for economic analysis, including demand for industrial property, square footage rents, and projected vacancy rates.	SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). See also Section 4.2.1 .
32	Loe	Share The Cities Action Fund

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<p><i>Note: Comments overlap with comment letters 59 and 71. Responses here are primarily cross-referenced to letter 59.</i></p>		
32-1	Ask for additional outreach and community engagement, specifically for non-English speaking residents.	Thank you for your letter. The comment is noted. The City translated Draft EIS executive summary material and held numerous workshops and community engagement events with interpretation into Spanish, Vietnamese, and Somali. Efforts were targeted to the South Park and Georgetown neighborhood areas.
32-2	EIS should address small business displacement, greater partnership with Indigenous communities, present a clear air quality monitoring strategy, highlight the unique importance of Ballard-Interbay as a freshwater harbor, consider BNSF's historical and continuing lack of transparency and accountability, clarify which existing and proposed uses in the industrial areas would be considered nonconforming, clarify the definition of industry supportive housing, include a complete list of the neighborhood-level comprehensive plan recommendations impacted by these zoning changes, connect Seattle's historic segregation, redlining, and exclusion to present-day location of industrial uses, complete a citywide zoning analysis looking at commercial and multi-family exclusion, and examine which recommendations and boundaries are carried over from older plans that have never been vetted for equity or impact.	See response to comments 59-2 through 59-7 and 71-1 through 71-7.
32-3	Examine comments submitted by the Duwamish River Community Coalition, Seattle Cruise Control, and the Georgetown/South Park Advisory Group. Requests additional scrutiny regarding the impacts of the systemic racist policies that created Seattle's industrial land and exacerbated the disparate impacts of pollution and disinvestment on nearby underserved neighborhoods of color.	See response to comments 59-1 and 59-7. Comments from the Duwamish River Community Coalition, Seattle Cruise Control, and Georgetown/South Park Advisory Group are addressed in letters 93, 37, and 96, respectively.
32-4	In the MML zone, code should clarify which existing and proposed uses will become nonconforming and should accommodate uses such as the WNBA Storm practice facility. In the UI zone, clarify the definition of industry supportive housing, provide examples from other locations of housing on top of industry, and propose thresholds for mixed use buildings.	See response to comments 59-2 and 59-3.
32-5	EIS does not examine where the II zone expressly contradicts existing neighborhood plans. EIS should include a complete list of the neighborhood-level comprehensive plan recommendations impacted by these zoning changes and analyze whether they conform or	See response to comment 59-4.

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	contradict the Draft Comprehensive Plan Goal and Policy Language in Appendix D.	
32-6	Agree with how the EIS alternatives are organized, but the document can be clearer about the distinction. Support Alternative 4 only because there are no alternatives that more liberally use the UI and II zones across larger portions of the city. EIS must do a better job establishing why areas change under each of the alternatives, and which areas should be treated as a cohesive cluster. At the neighborhood level, the proposed maps do not offer a picture of cohesiveness—what does it mean if blocks are divided? Alternative 1 should be considered a non-starter.	See response to comments 59-5 and 59-6.
32-7	City's industrial boundaries carry the history of segregation that cannot be washed away with a cursory equity analysis.	See response to comment 59-7.
32-8	EIS doesn't consider how boundaries of the current industrial zones came to exist. Impossible to develop policies that address land use and zoning issues without considering large areas of the city devoted exclusively to single-family housing.	See response to comment 59-7.
32-9	More thoroughly consider equity impacts. Connect Seattle's historic segregation, redlining, and exclusion to present-day location of industrial uses. Complete a citywide zoning analysis looking at commercial and multi-family exclusion in other areas. Examine which recommendations and boundaries are carried over from older plans that have never been vetted for equity or impact.	See response to comment 59-7.
32-10	EIS must make robust efforts to understand history and the sources of inequity in shaping land use decisions.	See response to comment 59-8.
33	Malshuk	First South Properties, LLC
33-1	Own property at 7343 E Marginal Way S. Zoned IG-1 and would be rezoned as MML under the Action Alternatives.	Thank you for your letter. The comment is noted and forwarded to City decision makers.
33-2	Request the Final EIS continue to recognize existing uses, increase flexibility for ancillary uses (from 30% to 49% limit), and broadly define industrial uses.	The comment is noted. Elements of the proposal increase flexibility for ancillary uses, especially in the UI zone. Details concerning qualification as industrial use under action alternatives is included in Appendix G of the Final EIS.
33-3	Urge the City to study and adopt maximum flexibility in the regulatory framework.	The comment is noted. Elements of the proposal would increase flexibility under action alternatives especially in the proposed II and UI zones.
34	McCullough	Seattle Industrial Lands Coalition
34-1	Writing on behalf of Seattle Industrial Coalition.	Thank you for your letter. The comment is noted and forwarded to City decision makers.

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34-2	Coalition members own, manage, and develop industrially-zoned property in Seattle. Members are adversely affected because the current and future use of their property will be unreasonably restricted by the proposal.	The comment is noted and forwarded to City decision makers. All proposed zones allow a broad variety of uses and proposed development standards allow a variety of potential development.
34-3	Proposal is not described in terms of its objectives per WAC 197-11-060 but rather as specific zoning text amendments.	Objectives of the proposal are defined in EIS Section 1.5.1 . The objectives are informed by the recommendations of an Industrial and Maritime Strategy stakeholder process. Objectives are identified in four overlapping categories of people, place, and production and process.
34-4	Draft EIS is based on inadequate information and fails to disclose or evaluate the entire proposal. Draft EIS alternatives fail to meet the requirements of SEPA because they are not reasonable alternatives.	See response to comment 25-5.
34-5	Draft EIS manipulates the description of the existing condition to mask existing non-industrial uses.	Section 3.8 Land & Shoreline Use includes existing land use analysis in map format that is based on empirical study and available data, and the section also includes narrative summary of existing land use for all sub areas.
34-6	Draft EIS fails to address many industrially-zoned areas in Seattle that include few industrial uses or where industrial uses are likely to be replaced in the next decade.	Existing land use is analyzed in Section 3.8 Land & Shoreline Use , and future land use impacts are analyzed under each alternative.
34-7	Draft EIS ignores impact of light rail station area walksheds.	The EIS includes information about existing and future light rail station areas to the extent it is known. Section 3.10 Transportation includes future light rail expansion plans. Geographic configurations of potential zone changes under EIS action alternatives is informed by the locations of existing and future rail station areas.
34-8	Draft EIS alternatives have not been tested for financial feasibility, including cap rates, vacancy rates, development hard costs, environmental costs, land value, and infrastructure.	SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). See Section 4.2.1 .
34-9	Draft EIS ignores the impacts of alternatives on blight.	The EIS analyzes numerous elements of the environment as required by the SEPA rules and a scoping process (i.e., Air Quality, Noise, Contamination, Land Use, Transportation safety etc.), and analysis of these environmental topics amounts to analysis of environmental health and livability impacts under different alternatives. No blight analysis is required in the SEPA rules under elements of the environment (197-11-444). Purely economic analysis is not required in an EIS. See Section 4.2.1 .
34-10	Proposal will result in significant adverse impacts to the built environment, including aesthetics and blight, environmental health, transportation, and land use.	The EIS analyses potential impacts on the built environment in sections including Sections 3.8 Land & Shoreline Use and 3.11 Historic, Archaeological, & Cultural Resources . Environmental health is addressed in multiple sections of the EIS in topical areas including Air Quality, Noise, Contamination, and Transportation, and in the Environmental Health and Compatibility subsection of Section 1.7.15 Equity & Environmental Justice Considerations .
34-11	Adoption of any Draft EIS alternatives will compound and exacerbate existing environmental problems.	Site contamination and remediation are addressed at the time of development or redevelopment through existing processes under MTCA. SEPA documentation submitted with project applications require disclosure of known or suspected contamination of soil, soil

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		vapor, groundwater, or other media, and lenders require Phase I and/or Phase II Environmental Site Assessments be completed before they will provide project funding. See Section 3.5 Contamination .
34-12	Draft EIS ignores regional impacts	The EIS discusses consistency with regional plans and policies in Section 3.8 Land & Shoreline Use . Where appropriate and feasible to analyze, potential impacts beyond City of Seattle borders in other parts of the region are studied or analyzed (including related to air quality/GHG and transportation).
34-13	Draft EIS fails to disclose prior planning efforts.	The EIS discusses historical planning and land use decisions (Section 3.8.1) along with the current policy and regulatory framework that features a summary of past planning efforts. The EIS also incorporates and references many other City plans that establish impact thresholds or levels of service such as parks plans, transportation plans and others.
34-14	Draft EIS must be withdrawn and reissued.	The non-project EIS was developed consistent with SEPA rules including WAC 197-11-442 and based on a scoping process consistent with WAC 197-11-360. See response to comment 25-5.
35	Nelson	Elliott Way Partners, LLC
35-1	Incorporate comments issued by Seattle Industrial Coalition and NAIOP Recommendations on land use alternatives to be studied and support for no design review requirements.	Thank you for your letter. The comment is noted. See also response to comments in letter 21.
36	Nitze	Nitze-Stagen
36-1	Entirely comfortable with the methodology applied by CAI once the revised, market-based assumptions are incorporated.	Economic development feasibility is not a part of the EIS. See Section 4.2.1 concerning development feasibility analysis.
36-2	The EIS should clearly document economic impacts such as demand for industrial property, square footage rents, and projected vacancy rates.	SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). See Section 4.2.1 .
37	Printz	Seattle Cruise Control
37-1	Examine comments submitted by the Duwamish River Community Coalition, Seattle Cruise Control, and the Georgetown/South Park Advisory Group. Ask the City to establish goals of near full employment and affordable housing to improve quality of life, protect the climate, and reduce traffic congestion. Prioritize climate protection and resiliency. Most support Alternative 4 of the alternatives proposed.	<p>Comments from the Duwamish River Community Coalition, Seattle Cruise Control, and Georgetown/South Park Advisory Group are addressed in letters 93, 37, and 96, respectively.</p> <p>The Industrial and Maritime seeks to simultaneously advance environmental protection, addressing climate change risks, and strengthening and supporting Seattle’s maritime and industrial sectors and ensuring the benefits of economic diversity and opportunity. In order to address all of these goals, Section 3.2.3 Air Quality & GHG provides mitigation measures that address the root causes of greenhouse gas emissions; fossil fuel combustion for both industrial and heating processes, and vehicle use, while not restricting industrial users who may have a history of fossil fuel use. Green infrastructure methods are standard for meeting on-site stormwater management as stated in Section 3.14 Utilities.</p> <p>Text has been added to Section 3.2.3 to strengthen potential mitigation measures aimed at climate resiliency and transformation of fossil fuel dependent industries.</p>

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37-2	<p>Water Quality section must address impacts of cruise ships. Most air/water impacts are narrowly constrained to the study areas. Document mentions there are significant impacts to Puget Sound, but only refers to the Sound in two places with no listing of mitigation measures for that body of water.</p>	<p>Text has been added to Sections 3.3.2 and 3.3.3 which discusses the classification of the Puget Sound as a No Discharge Zone which prohibits the discharge of sewage, as well as other regulations which prohibit the discharge of oil, trash, and other pollutants. Text was also added to Sections 3.3.1 and 3.3.2 to reflect the wider regional impact of maritime activities including cruise ships. See Section 3.3 Water Resources.</p>
37-3	<p>The vague mention of “planned regulatory requirements” to achieve emission reduction outcomes comes across as misplaced faith that undermines our ability to plan realistically for the future. Statements about maritime emissions lack context.</p>	<p>The overall context for current maritime emissions for criteria air pollutants and GHG emissions can be found in Section 3.2.2, Impacts Common to All Alternatives, Exhibit 3.2-12 and Exhibit 3.2-14. In addition, text has been added to Section 3.2.1 to indicate that additional context and information for maritime emissions in general, and in relation to the MIC areas affected by the proposal, can be found in the 2016 Puget Sound Maritime Emissions Inventory (PSMEI 2018), which is now incorporated by reference. See Section 3.2 Air Quality & GHG.</p> <p>Section 3.2.2, Maritime Emissions, includes a discussion of several regulatory changes that will decrease maritime emissions in alignment with IMO Annex VI. These regulatory changes, combined with anticipated though uncertain future improvements in both engine technology and emission requirements set by federal, state, and international regulatory entities, are expected to decrease future air emissions, particularly from diesel engines.</p> <p>Additional text has been added to Section 3.2.3 Air Quality & GHG to address the potential for state and local government to impose restrictions on maritime air emissions for ocean-going vessels while underway in US waters. Additional text has also been added to address the potential to expand availability of shore power to include those areas and ships not covered by the Port of Seattle’s existing plans.</p> <p>As discussed in WAC 197-11-440, this non-project EIS is limited to a general discussion of the impacts of alternate proposals for policies contained in the proposed Industrial and Maritime Strategy. The City of Seattle concluded that as proposed, the alternatives would not prevent or deter efforts to reduce emissions in comparison to local or regional goals or targets for GHG reductions.</p> <p>The current level of analysis provides an appropriate level of detail for a non-project EIS. Subsequent developments that may arise from the proposed land use changes in the Industrial and Maritime Strategy will be required to meet all applicable codes and regulations, and to conduct project-level SEPA review at that time, in which analysis will be conducted to assess site specific impacts and necessary mitigation measures, including for maritime emissions related issues.</p>
38	Rivera	Seattle Mariners
38-1	<p>Encourage the City to recognize the unique character of the Stadium Transition Area Overlay District. Final EIS must recognize the stadiums and event center that draw more than six million visitors each year and make the Stadium District different than other industrial transitional areas. Most support Alternative 4 of the alternatives proposed.</p>	<p>The comment is noted and forwarded to City decision makers. The Preferred Alternative includes more distinct measures in the proposed development standards for the STAOD compared to the Draft EIS Alternatives.</p>

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38-2	Support the proposed lodging use allowance in the Stadium District and within the UI zone. Request the Preferred Alternative allow lodging without a size limit in the Stadium District. Encourage the Final EIS to acknowledge positive impact lodging in the Stadium District will have on transportation patterns in the district by keeping event attendees in the neighborhood and off the roads before and after events.	The comment is noted. If a small portion (0.4 FAR) of a development includes light industrial uses, the maximum size of use limit would not apply.
38-3	Do not place size limits on activating uses within the Stadium District. City should use incentives to encourage smaller-scale spaces. Support the proposed size of use limit for office uses proposed in the Draft EIS.	The comment is noted. Please note that if a small portion of the development (0.4 FAR) includes light industrial uses, the maximum size of use limits would not apply.
38-4	Support additional density for compatible uses in the Stadium District.	The comment is noted. Note that the Preferred Alternative applies special allowances in the STAOD (density and other standards). Please see Appendix G .
38-5	The Final EIS should include a transportation study that examines the potential impacts should the existing IC-zoned and IG-zoned parcels in the Stadium District be developed to their maximum available density as office buildings under the proposed framework.	The EIS analyzes a 22-year future scenario under different land use alternatives. Growth and development patterns are projected in the aggregate and are not broken down to a parcel specific level. The action alternatives do evaluate for different concentrations of office and residential future land uses in the vicinity of the STAOD because the alternatives apply different land use regulatory schemes. Different transportation impacts associated with the different growth projections under the alternatives are a feature of the transportation analysis in Section 3.10 Transportation .
38-6	The Final EIS should analyze allowing workforce housing within the Stadium District.	The comment is noted. Some industry-supportive housing would be allowed in action alternatives. Please see Section 4.2.3 .
39	Ugles	International Longshore and Warehouse Union Locals 19, 52, and 98, Inland Boatmen Union
39-1	As union workers, and those most directly impacted by zoning changes within the City's MIC's, we hope you will give considerable weight to our support for Alternative 2,	Thank you for your letter. The comment is noted and forwarded to City decision makers.
39-2	Experiences during the pandemic made apparent how essential our maritime workforce and infrastructure are to the residents and industries of our state. The Final EIS should recognize and be informed by these experiences.	Chapter 2 in the Final EIS includes new text that describes the effects of the pandemic related to this proposal.
39-3	(1) Document should recognize the critical public infrastructure to the state's economy in the MICs. (2) Document should mention the quality of the jobs, particularly union jobs, created within the Alternatives. (3) Document should include separate section on freight movement in the MIC's, especially rail and truck.	(1) Language has been added to the Primary & Secondary Study Areas in Section 3.10.1 Affected Environment reflecting the commenter's suggestion. (2) Objectives for the action alternatives include increasing living wage jobs; see Section 1.5.1 . The types of industrial uses promoted in each zone and the number of jobs expected for each alternative are included in Sections 1.5 and 2.4 of the EIS. Details of job types are not projected beyond industrial and non-industrial jobs consistent with the areawide programmatic analysis. (3) The Final EIS has been reorganized to include freight as a separate section with additional information.

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39-4	Draft EIS should describe marine terminals and Elliott Bay's naturally deep harbor as essential and irreplaceable to industrial activity, the economy, and maritime jobs/livelihoods.	Language has been added to Primary & Secondary Study Areas in Section 3.10.1 Affected Environment reflecting the commenter's suggestion.
39-5	We request that the Final EIS delineate the projected number of unionized jobs created in each Alternative; provide a definition of a quality job (versus simply a "living wage"), and that the objective of the EIS be restated to increase the quantity of quality jobs.	Comments is noted. Chapter 2 of the Final EIS includes edits to the text to describe the benefits of union jobs, with expanded discussion of the likelihood of projected employment to be unionized.
39-6	Draft EIS lacks the subject of freight, including trucks and rail. Freight should be a standalone subject in the Final EIS with analysis of freight movement, rail operations, and freight and passenger rail impacts. Auto & Freight sections only address vehicular traffic volumes and not conditions for freight movement or facilities.	The Final EIS has been reorganized to include freight as a separate section with additional information.
40	Selig	J Selig Real Estate, LLC
40-1	Appreciate the opportunity to comment. Currently proposing a rezone of a split-zoned parcel at 2501 NW Market St (currently IC and NC-3, requesting NC) within the Ballard Urban Village and outside the BINMIC. Request the Final EIS consider this rezone.	Thank you for your letter. The comment is noted and forwarded to City decision makers. The EIS includes different zoning options for the site in the alternatives. In addition to the factors noted in the comment letter, the site is adjacent to shoreline lands with working maritime uses. See maps of the Preferred Alternative in Appendix C .
40-2	Requested rezone is consistent with draft LU Goal 12.	The comment is noted and forwarded to City decision makers.
40-3	Requested rezone is consistent with Comp Plan policy LU 10.9.	The comment is noted and forwarded to City decision makers.
40-4	Comp Plan expressly states the City should avoid placing industrial zones within urban villages.	The comment is noted and forwarded to City decision makers.
41	Trohimovich	Futurewise
41-1	Appreciate the opportunity to comment. Overall concludes the Draft EIS adequately explains the proposal, analyzes the alternatives, identifies and discloses environmental impacts, and identifies required and potential mitigation measures.	Thank you for your letter. Comment is noted.
41-2	Final EIS should consider designating truck routes serving industrial and manufacturing areas away from residential areas especially residential areas with vulnerable populations as an additional air quality and GHG mitigation measure.	An additional mitigation measure has been added to Section 3.2.3 .
41-3	Clarify sentence on page 3-94 regarding impacts common to alternatives under sea level rise (Water Resources) considering that Seattle's flood plain regulations and master program regulations will not protect against sea level rise overall and for the subareas.	As stated in Section 3.3.2 Water Resources , development in the study area will be required to comply with regulations which may reduce the vulnerability of those developments to sea level rise impacts relative to existing conditions, particularly in locations that are currently not compliant with current regulations. As flood regulations evolve based on the best available science,

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		requirements for development will be modified. Text has been added to clarify that regulations for development in the study area may change. This impact is expected to apply to all alternatives proposed, including the No Action Alternative.
41-4	EIS should propose as a mitigating measure development regulation that require buildings, structures, and industrial and manufacturing sites to be elevated above the sea level rise projected to occur during the life of the facility.	See response to comment 41-3. Additional text has been added to Section 3.3.3 Water Resources to add consideration of sea-level rise in design of buildings, structures, and industrial and manufacturing sites.
41-5	EIS does not analyze the impacts of allowing more housing in the proposed Urban Industrial (UI) zone on nearby industrial and manufacturing uses.	The EIS includes a discussion of compatibility as one of the impact categories in Section 3.8 Land & Shoreline Use . See also Section 3.9 Housing that describes impacts of allowed industry supportive housing and other housing under each alternative including exposure to air pollution, noise pollution, or environmental hazards.
41-6	One of the most effective mitigating measures for cultural and archaeological resources is to require investigation by cultural and archaeological professionals working cooperatively with local Tribes and Native American groups to determine if a site contains cultural or archaeological resources before ground disturbing activities are allowed. EIS should add this as one of the required mitigation measures.	<p>Cultural resources review, including archaeological survey, is a process that is done prior to the start of many projects, and includes consultation with Tribes. Many federal, state, and local statutes and ordinance require notice and consultation with affected Tribes before, during, and after project review. The National Historic Preservation Act (NHPA) of 1966, was amended in 1986 with provisions for consultation with affected Tribes and 1992 to include and clarify the roles and responsibilities of Indian Tribes in Section 106 reviews. All cultural resources survey and archaeological work will follow best practices and standard archaeological techniques in the discovery and preservation of cultural and historical artifacts.</p> <p>Any project with Federal funding, permits, or on federal or state lands, or that use State capital funds have some cultural resources survey and inventory requirements that must be satisfied before construction activities can begin. An Inadvertent Discovery Plan (IDP) typically accompanies a cultural resources survey and inventory report, which spells out the appropriate procedures to follow should an inadvertent discovery of cultural or archaeological resources occur.</p> <p>See also response to comment 1-4.</p>
41-7	Example Becket Point project in Jefferson County regarding upfront archaeological investigations.	The comment is noted. See also response to comment 41-6.
42	Tucker	Pacific Christian Academy
42-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
43	Vaughn	GPG&C Investment Group LLC
43-1	Follow up to confirm receipt of letter 44.	Thank you for your letter. Comment is noted. See response to comments in letter 44.
44	Weed	SoDo Industrial Coalition
44-1	Further analysis requested on industrial land quantification.	Thank you for your letter. See Section 3.8.1 Land & Shoreline Use for an analysis of existing land use.

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44-2	Further detail and analysis requested regarding work force housing to support the vision/study.	See Section 4.2.3 . Under the Preferred Alternative more of the potential housing would be in the SODO/Stadium Subarea; there would be some limited opportunity elsewhere too.
44-3	Request quantification of the level of infrastructure investment, capital projects, and circulation improvements required. Suggest leveraging light rail commitments.	<p>SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). See Section 4.2.1.</p> <p>The EIS includes a Mitigation Measures section which describes the various plans that include specific projects and high priority areas for improvement. Those documents include: the Freight Master Plan, Transit Master Plan, Pedestrian Master Plan, the Bicycle Master Plan, the Bicycle and Pedestrian Safety Analysis, the Ballard-Interbay Regional Transportation (BIRT) System Report, and the Georgetown Mobility Study. SDOT is currently in the process of developing the Seattle Transportation Plan which will integrate the City’s modal plans into a comprehensive vision for the citywide transportation network centered around the following values and goals: equity, safety, mobility, sustainability, livability, and excellence. The STP is considering station planning needs for Sound Transit’s planned light rail extension.</p> <p>Text has been added to the mitigation section of this EIS to note that the City and Sound Transit are coordinating on transportation mitigation around expanded and new light rail stations and notes the System Access Fund as a funding mechanism for station area improvements.</p>
44-4	Document should emphasize the importance of transit investments in the MICs and encourage TOD density.	The commenter’s support for TOD is noted. The EIS addresses transit both from a capacity perspective as well as its benefits to mitigate traffic congestion as described in the Travel Demand Management (TDM) section of the Mitigation Measures section. No changes are requested with respect to the EIS transportation analysis.
44-5	Request to include a stated strategy and commitment for direct solicitation of input from potentially affected parties throughout the policy making process.	Following the EIS process, the City will develop specific policy and zoning proposals that will be the subject of public meetings and public hearings by the City Council.
45	Aggen	Individual
45-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. Comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
46	Anane	Individual
46-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. Comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
47	Anawalt	Individual
47-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. Comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
48	Baker	Individual

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48-1	Supports Alternative 4.	Thank you for your letter. Comment is noted and forwarded to City decision makers.
49	Brubeck	Individual
49-1	Strategy was not developed with Duwamish Tribe or other tribes.	Tribes were contacted through the scoping and Draft EIS comment period opportunities. See also letter 1 with Duwamish Tribal comments on proposals.
49-2	The Duwamish MIC map labeling and region naming should be revised to distinguish areas west of the Duwamish River by their established place names	The comment is noted and forwarded to City decision makers. The subareas are broadly defined for analysis purposes in the EIS.
49-3	<p>(1) Document should include planned active transportation networks including 2014 BMP and BMIPs.</p> <p>(2) Transit, biking, and walking routes are necessary through the Duwamish MIC.</p> <p>(3) Mitigation measures should be included to close gaps in pedestrian and bike routes and avoid significant unavoidable adverse impact to active transportation and safety.</p>	<p>(1) Planned active transportation projects are shown in Draft EIS Exhibit 3.10-20 and Exhibit 3.10-21 (Final EIS Exhibit 3.10-23 and Exhibit 3.10-24).</p> <p>(2) The commenter’s support for improved transit, biking, and walking facilities in the Duwamish MIC is noted.</p> <p>(3) The EIS includes a Mitigation Measures section dedicated to Pedestrian & Bicycle System Improvements which describes the various plans that include specific projects and high priority areas for improvement. Those documents include: the Pedestrian Master Plan, the Bicycle Master Plan, the Bicycle and Pedestrian Safety Analysis, the Ballard-Interbay Regional Transportation (BIRT) System Report, and the Georgetown Mobility Study. SDOT is currently in the process of developing the Seattle Transportation Plan which will integrate the City’s modal plans into a comprehensive vision for the citywide transportation network centered around the following values and goals: equity, safety, mobility, sustainability, livability, and excellence.</p>
49-4	<p>List of proposed mitigation measures</p> <p>(1) Full implementation of BMP, PMP, TMP & FMP with priority to improvements at hazardous areas identified in the BPSA. Increase current funding to accomplish expedited implementation.</p> <p>(2) Implementation of Design Guidelines in Appendix C of FMP and add to Streets Illustrated manual</p> <p>(3) Prioritize construction of sidewalks/paths between places of employment and bus stops/light rail stations.</p> <p>(4) Replacement or implementation of phase 2 retrofit of Ballard Bridge to include shared use path meeting current design standards.</p> <p>(5) Initiation of transit service along streets such as West Marginal Way SE to serve employees and customers of industries and maritime businesses.</p> <p>(6) Implementation of safe bike routes from the First Ave S Bridge through Georgetown to Downtown.</p>	<p>(1) SDOT is currently in the process of developing the Seattle Transportation Plan which will integrate the City’s modal plans into a comprehensive vision for the citywide transportation network. The City has a biennial budget process through which transportation system improvements, maintenance, and rehabilitation needs are considered and funded as feasible. In addition to pursuing grant funding sources, the biennial budget is the process through which funding for transportation improvements would be identified.</p> <p>(2) If new zoning designations are adopted, SDCI will work with SDOT to develop updates to the Streets Illustrated manual reflecting street design standards tailored to the industrial context. Updates will consider designs that can accommodate both freight activity and non-motorized uses with a focus on reducing potential conflicts.</p> <p>(3) Language to this effect has been added to the Pedestrian & Bicycle System Improvements section to note how the City may prioritize new active transportation connections.</p> <p>(4) The EIS includes replacement of the Ballard Bridge as a potential mitigation measure (page 3-425 of the Draft EIS). The City recently completed the Ballard-Interbay Regional Transportation System project which studied two replacement options. The report has been submitted to the Washington State Legislature for consideration of planning/funding for design and engineering.</p>

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	<p>(7) Improving pavement conditions/drainage should be strategy for safety/ease of active transportation and vehicles.</p> <p>(8) Active transportation should be included under TSMO as strategy to reduce SOV use and free up capacity for freight/transit. Seattle should implement entire BMP and strive for high bike mode share.</p>	<p>(5) The commenter's support for transit service tailored to employees/customers of industries and maritime business is noted. The Mitigation Measures section includes language to this effect under the Travel Demand Management (TDM) section: "Potential TDM measures suited to the study area could include last-mile shuttle systems between key transit nodes and the MICs; coordination with King County Metro and/or Sound Transit to provide off-peak transit service tailored to shift workers with irregular hours; ..." The language has been clarified to note that service could be tailored not just in terms of timing, but also key corridors serving many industrial and maritime workers.</p> <p>(6) The EIS includes a Mitigation Measures section dedicated to Pedestrian & Bicycle System Improvements including the City's safety programs and Draft Exhibit 3.10-21 (Final EIS Exhibit 3.10-24) shows the currently planned network improvements, including bike lanes, multi-use trails, and neighborhood greenways in the area mentioned by the commenter. SDOT is currently in the process of developing the Seattle Transportation Plan which will integrate the City's modal plans into a comprehensive vision for the citywide transportation network.</p> <p>(7) Language regarding pavement conditions/safety has been added to the Mitigation Measures section of the Final EIS.</p> <p>(8) The commenter's support for a more robust bike network to support increased travel by bike is noted. The Mitigation Measures section includes language to this effect under the Travel Demand Management (TDM) section which is focused on reducing demand for auto travel (resulting in a shift to other modes including bike travel) and the Pedestrian & Bicycle System Improvements section which discusses how the City could improve the network to attract more people to travel by bike.</p>
49-5	Seattle should not accept death and serious injuries to people walking and biking. Revise to propose measures that eliminate adverse impacts to people using active transportation.	The City is committed to ending deaths and serious injuries caused by traffic collisions. This commitment is reflected in the Vision Zero policy which is supported by a variety of strategies as described in the EIS. The EIS includes a Mitigation Measures section dedicated to Pedestrian & Bicycle System Improvements including the City's safety programs. However, the City also acknowledges that significant impacts to active transportation and safety may remain due to the projected increase in people walking and biking in areas with network gaps and the increased potential for vehicle conflicts (particularly trucks) with vulnerable users. While the City can pursue a variety of mitigation measures to improve 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.
49-6	Land designated for industrial and maritime use is Duwamish Tribe land. Other tribes have rights for fishing in the area.	The City appreciates Mr. Brubeck's comments. The City agrees that developing histories centering on the Tribes' perspectives should include the active involvement of the Duwamish and other affected Tribes, and assumes that they have "no present or future." The strategy of context development from the Tribes' perspectives is one of using their input, their stories, and their voices to create narratives to inform others of not only the history of the region's Tribes but of their continued cultural ties to the areas in the MIC. Cultural resources review is a process that is done prior to the start of many projects, and includes consultation with Tribes. Many

Number	Comment Summary	Response
		<p>federal, state, and local statutes and ordinances require notice and consultation with affected Tribes before, during, and after project review. The National Historic Preservation Act (NHPA) of 1966, was amended in 1986 with provisions for consultation with affected Tribes and 1992 to include and clarify the roles and responsibilities of Indian Tribes in Section 106 reviews.</p> <p>The Advisory Council on Historic Preservation (ACHP) adopted a Policy Statement Regarding the ACHP's Relationships with Indian Tribes in 2000. The policy was developed in consultation with some Tribes and inter-Tribal organizations, and addresses tribal sovereignty, government-to-government consultation, trust responsibilities, tribal participation in historic preservation, sympathetic construction, and respect for tribal religious and cultural values.</p> <p>The state of Washington has a government-to-government relationship with the 29 federally recognized Tribes in the state (RCW 43.376). Each Tribe is a sovereign nation and has its own definition of appropriate consultation.</p>
49-7	City should actively involve the Duwamish and other affected tribes in future planning for the area. Mitigation should include an emphasis on archeological investigations in consultation with the tribes.	See response to comment 49-6.
50	Burg	Individual
50-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
51	Bush	Individual
51-1	Live in SODO. Supports Action Alternatives. Desire for more mixed use, affordable housing, and safe walking and biking conditions.	Thank you for your letter. The commenter's support for the Action Alternatives and vision for SODO to be a comfortable walking and biking environment are noted. SDOT is currently in the process of developing the Seattle Transportation Plan which will integrate the City's modal plans into a comprehensive vision for the citywide transportation network including industrial areas like SODO.
52	Clark	Individual
52-1	Supports Alternative 4 and requests the alternative be taken farther and concentrate more housing around Link light rail stations.	Thank you for your letter. The comment is noted and forwarded to City decision makers. See the definition of the Preferred Alternative in Chapter 2 which includes the II zone around station areas, and a focus of supportive housing in the Stadium District.
52-2	City needs a vision for what "future industrial" looks like, and implementation and follow through to match the vision. Need to leverage this huge transit investment in the City by creating station-adjacent uses that will attract riders day and night.	The comment is noted. The proposed new zoning designations are intended to support station adjacent land uses in an industrial context.
53	Corbin	Individual
53-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.

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Number	Comment Summary	Response
54 Dee		
54-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
54-2	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	See response to comment 54-1.
55 Devine		
55-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
56 Dickinson		
56-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
57 Dillon		
57-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
58 DiMartino		
58-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
59 Dubicki		
	<i>Note: Comments overlap with letters 32 and 71. Responses provided here are cross-referenced in responses to letters 32 and 71.</i>	
59-1	Examine comments submitted by the Duwamish River Community Coalition, Seattle Cruise Control, and the Georgetown/South Park Advisory Group. Requests additional scrutiny regarding the impacts of the systemic racist policies that created Seattle’s industrial land, underlying industrial zone boundaries, and exacerbated the disparate impacts of pollution and disinvestment on nearby underserved neighborhoods of color.	Thank you for your letter. Comments from the Duwamish River Community Coalition, Seattle Cruise Control, and Georgetown/South Park Advisory Group are addressed in letters 93, 37, and 96, respectively.
59-2	In the MML zone, code should clarify which existing and proposed uses will become nonconforming and should accommodate uses such as the WNBA Storm practice facility.	Comment is noted. Additional information is added in the Final EIS concerning non-conforming uses in the MML zone. See also Section 4.2.2 .
59-3	In the UI zone, clarify the definition of industry supportive housing, provide examples from	See Section 4.2.3 concerning the definition of industry-supportive housing.

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Number	Comment Summary	Response
	other locations or housing on top of industry, and propose thresholds for mixed use buildings.	
59-4	EIS does not examine where the II zone expressly contradicts existing neighborhood plans. EIS should include a complete list of the neighborhood-level comprehensive plan recommendations impacted by these zoning changes and analyze whether they conform or contradict the Draft Comprehensive Plan Goal and Policy Language in Appendix D.	Comment is noted. Section 3.8 Land & Shoreline Use includes discussion of consistency with existing plans and policies at the City and regional level including MIC subarea plans. Neighborhood plans were developed generally in the 1990s and anticipated similar adjacent industrial uses as those in the II zone. The City will re-review neighborhood policies with the development of MIC plan updates consistent with regional requirements.
59-5	Agree with how the EIS alternatives are organized, but the document can be clearer about the distinction. Support Alternative 4 only because there are no alternatives that more liberally use the UI and II zones across larger portions of the city. EIS must do a better job establishing why areas change under each of the alternatives, and which areas should be treated as a cohesive cluster.	Comment is noted. See response to comment 71-11. Chapter 2 of the EIS describes the alternatives, including the overall intent and themes for each. A Preferred Alternative is added in the Final EIS. All Action Alternatives are different variations of application of the UI, II, and Maritime, Manufacturing and Logistics (MML) zones. General locational criteria and intent is described for each of the three proposed new zones in Chapter 2 .
59-6	At the neighborhood level, the proposed maps do not offer a picture of cohesiveness. What does it mean if blocks are divided? Alternative 1 should be considered a non-starter.	Comment is noted. The EIS Appendix C includes detailed maps depicting alternate zone changes with specific boundaries. A story map is also provided by the City which allows detailed review to a parcel-specific level. See the storymap link here .
59-7	City's industrial boundaries carry the history of segregation that cannot be washed away with a cursory equity analysis. EIS doesn't consider how boundaries of the current industrial zones came to exist. Impossible to develop policies that address land use and zoning issues without considering large areas of the city devoted exclusively to single-family housing. EIS must more thoroughly consider equity impacts, including connecting Seattle's historic segregation, redlining, and exclusion to the present-day location of industrial uses, completing a citywide zoning analysis looking at commercial and multi-family exclusion in other areas, and examining which recommendations and boundaries are carried over from older plans that have never been vetted for equity or impact.	Comment is noted. In the Final EIS a new subsection is added to the review of historical planning and land use decisions (see Section 3.8.1). The subsection includes the historic red lining map and a discussion of the map's implications related to this proposed action. The EIS also includes an Equity & Environmental Justice review in Section 1.7.15 .
59-8	EIS must make robust efforts to understand history and the sources of inequity in shaping land use decisions.	Comment is noted. See response to comment 59-5 and 59-7
59-9	Add documentation, analysis, and maps that connect Seattle's historic segregation, redlining, and exclusion to the present-day location of industrial uses. Complete a citywide analysis of zoning that looks specifically at the ways commercial and multi-family exclusions in other parts of the city lead to the competition for industrial land. Examine which recommendations and boundaries are carried	See response to comments 59-5 and 59-7.

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Number	Comment Summary	Response
	over from older plans that have never been vetted for equity or impact, including transportation and public facilities	
59-10	Specify which groups of zoning changes within each alternative should be treated as divisible or as a cluster/group and describe why.	See response to comment 59-6.
59-11	Engage communities to explain the purpose of this EIS more clearly, the difference between the proposed zones and the Alternatives, and the legislative steps yet to come.	The comments are noted. Section 1.4.2 describes public comment opportunities to develop the proposals. The Draft EIS comment period of 45 days was extended several weeks, and more engagement was conducted in Georgetown and South Park. The City will continue to engage with communities after publication of the Final EIS related to potential legislation to make comprehensive plan policy amendments and/or zoning changes. The City will also engage with communities during updates to subarea plans.
59-12	Clarify which existing and proposed uses in the industrial areas will be considered nonconforming under the MML, II, and UI zones.	See response to comment 59-2.
59-13	Clarify the definition of “industry supportive housing,” provide examples from other locations of mixed-use housing/industrial, and propose thresholds for mixed-use buildings.	See response to comment 59-3. See Section 4.2.3 concerning industry supportive housing.
59-14	Develop a complete list of the neighborhood-level comprehensive plan recommendations in areas that will be impacted by these zoning changes, and analyze whether they conform or contradict the Draft Comprehensive Plan Goal and Policy Language found in Appendix D.	See response to comment 59-4.
60	Dunn	Individual
60-1	Limited services in West Seattle and traffic on/off the peninsula is a major contributor to air and water pollution, unhealthy noise levels, and climate warming that will eventually exacerbate our growing climate crises.	Thank you for your letter. The commenter’s perspective on existing traffic congestion and other environmental conditions is noted.
60-2	Riding bicycles should be made safer by slowing down freight and vehicle traffic on W Marginal Way, Spokane St, and E Marginal Way. Seattle should reduce southbound vehicle traffic to one lane on W Marginal Way between the West Seattle Bridge and Duwamish Longhouse to mitigate environmental impacts so that bicycle riders have a safe connection instead of riding on a sidewalk and develop safe routes throughout industrial and maritime areas.	The commenter’s suggestion to implement traffic calming measures and improve bike facility connectivity along W Marginal Way is noted. That location is identified in Draft Exhibit 3.10-21 (Final EIS Exhibit 3.10-24) as having a planned multi-use trail. The City is currently considering options to fill the identified trail gap.
61	Eldridge	Individual
61-1	EIS should consider how future zoning counteracts the existing racialized exclusionary zoning history.	Comments is noted. The Final EIS includes additional information on this topic in Section 3.8 Land & Shoreline Use under the overview of historical planning and land use decisions subsection.
62	Fragada	Individual

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62-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
63	Frishholz	Individual
63-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
64	Fiorito	Individual
64-1	Support for UI zoning and opportunity for makers space.	Thank you for your letter. The comment is noted and forwarded to City decision makers. The Preferred Alternative identifies UI for the site similar to alternatives 3 and 4.
65	Graham	Individual
65-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
66	Greene	Individual
66-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
67	Hammerberg	Individual
67-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
68	Hanlon	Individual
68-1	In UI or II zones, how will adverse impacts (noise, traffic) be enforced after business hours? How does the SIMS address community concerns over code enforcement?	Thank you for your letter. City noise regulations (SMC 25.08) establish exterior sound level limits for various land use zones with the limits varying depending on the source zone and the receiving zone (see Exhibit 3.6-2). These limits are intended to result in acceptably low interior noise levels for residences and other sensitive noise receptors. City noise regulations also address construction noise, limiting the times during the day when construction noise, both impact and non-impact, can exceed exterior noise limits (see Exhibit 3.6-3). Noise limits are enforced by the City's noise abatement coordinators. The Seattle Police Department handles response to public nuisance noise—such as horns or sirens, music, amplified sound, motor vehicles, or watercraft—via the non-emergency line. A mitigation measure has been added to improve coordination and improve the user experience for community members registering complaints or requesting information about enforcement under air quality/ghg, noise, and contamination topics.
69	Huling	Individual

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Number	Comment Summary	Response
69-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
70	Kartchner	Individual
70-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
71	Katz <i>Note: Comments overlap with comment letters 32 and 59. Responses here are primarily cross-referenced to letter 59.</i>	Individual
71-1	Engage communities to explain the purpose of this EIS more clearly, the difference between the proposed zones and the Alternatives, and the legislative steps yet to come. Address small business displacement.	Thank you for your letter. Comment is noted. See response to comment 59-11.
71-2	Emphasize a greater partnership with Indigenous communities and Indigenous sovereignty.	<p>The comment is noted. Cultural resources review is a process that is done prior to the start of many projects, and includes consultation with potentially affected Tribes. Many federal, state, and local statutes and ordinances require notice and consultation with affected Tribes before, during, and after project review. The National Historic Preservation Act (NHPA) of 1966, was amended in 1986 with provisions for consultation with affected Tribes and 1992 to include and clarify the roles and responsibilities of Indian Tribes in Section 106 reviews.</p> <p>The Advisory Council on Historic Preservation (ACHP) adopted a Policy Statement Regarding the ACHP's Relationships with Indian Tribes in 2000. The policy was developed in consultation with some Tribes and inter-Tribal organizations, and addresses tribal sovereignty, government-to-government consultation, trust responsibilities, tribal participation in historic preservation, sympathetic construction, and respect for tribal religious and cultural values.</p> <p>The state of Washington has a government-to-government relationship with the 29 federally recognized Tribes in the state (RCW 43.376). Each Tribe is a sovereign nation and has its own definition of appropriate consultation.</p>
71-3	Present a clear path to support daily air monitoring in Ballard-Interbay.	As described in Section 3.2.1 Air Quality & GHG , the Puget Sound Clean Air Agency (PSCAA) has local authority for setting regulations and permitting of stationary air pollutant sources and construction emissions. PSCAA and Ecology maintain and operate a network of ambient air quality monitoring stations measuring the levels of criteria pollutants found in the atmosphere throughout the region, with the Ecology-operated site at 10th and Weller the closest network station to the Interbay-Ballard subarea (https://secure.pscleanair.org/AirQuality/NetworkMap). In addition, PSCAA maintains an air quality sensor map that displays calibrated data for a variety of pollutants, measured by lower-cost portable air quality devices, including dust, fine particulate matter, carbon dioxide, carbon monoxide, ozone, nitrogen oxide, and others (http://map.pscleanair.org/?lat=47.6768311&lon=-

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Number	Comment Summary	Response
		<p>122415b425&Z=9). These air sensors are intended to be educational and are non-regulatory, meaning that they cannot be used for permitting, compliance, policy, or interpretation of health effects. The data from these sensors are not owned by PSCAA.</p> <p>Text has been added to Section 3.2.3 Air Quality & GHG to suggest consideration of a City-owned and operated air monitoring station in Ballard-Interbay to provide the public with access to daily air monitoring data.</p>
71-4	Prioritize dramatic visual cues in built environment to get people who are driving vehicles to slow down on major arterials and urban freeways.	The comment is noted and forwarded to City decision makers.
71-5	Address the power and values imbalance caused by freight lobby's political pressure.	The comment is noted and forwarded to City decision makers.
71-6	Highlight the unique importance of Ballard-Interbay as a freshwater harbor.	The comment is noted. A reference noting the freshwater nature of the harbor is added in the description of the study area in Chapter 2 .
71-7	Highlight BNSF's historic and continuing lack of transparency and accountability.	The comment is noted and forwarded to City decision makers.
71-8	Clarify which existing and proposed uses in the industrial areas will be considered nonconforming under the MML, II, and UI zones.	See response to comment 59-2.
71-9	Clarify the definition of "industry supportive housing," provide examples from other locations of mixed-use housing/industrial, and propose thresholds for mixed-use buildings.	See response to comment 59-3.
71-10	Develop a complete list of the neighborhood-level comprehensive plan recommendations in areas that will be impacted by these zoning changes, and analyze whether they conform or contradict the Draft Comprehensive Plan Goal and Policy Language found in Appendix D.	See response to comment 59-4.
71-11	Specify which groups of zoning changes within each alternative should be treated as divisible or as a cluster/group and describe why.	See response to comment 59-6.
71-12	Add documentation, analysis, and maps that connect Seattle's historic segregation, redlining, and exclusion to the present-day location of industrial uses.	See response to comment 59-7.
71-13	Complete a citywide analysis of zoning that looks specifically at the ways commercial and multi-family exclusions in other parts of the city lead to the competition for industrial land.	See response to comment 59-7.
71-14	Examine which recommendations and boundaries are carried over from older plans that have never been vetted for equity or impact, including transportation and public facilities.	See response to comment 59-7.

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Number	Comment Summary	Response
71-15	Examine comments submitted by the Duwamish River Community Coalition, Seattle Cruise Control, and the Georgetown/South Park Advisory Group.	See response to comment 59-1. Comments from the Duwamish River Community Coalition, Seattle Cruise Control, and Georgetown/South Park Advisory Group are addressed in letters 93, 37, and 96, respectively.
71-16	Requests additional scrutiny regarding the impacts of the systemic racist policies that created Seattle’s industrial land and exacerbated the disparate impacts of pollution and disinvestment on nearby underserved neighborhoods of color.	See response to comments 59-1 and 59-7.
71-17	In the MML zone, code should clarify which existing and proposed uses will become nonconforming and should accommodate uses such as the WNBA Storm practice facility.	See response to comment 59-2.
71-18	In the UI zone, clarify the definition of industry supportive housing, provide examples from other locations of housing on top of industry, and propose thresholds for mixed use buildings.	See response to comment 59-3.
71-19	EIS does not examine where the II zone expressly contradicts existing neighborhood plans. EIS should include a complete list of the neighborhood-level comprehensive plan recommendations impacted by these zoning changes and analyze whether they conform or contradict the Draft Comprehensive Plan Goal and Policy Language in Appendix D.	See response to comment 59-4.
71-20	Agree with how the EIS alternatives are organized, but the document can be clearer about the distinction.	See response to comment 59-5.
71-21	Support Alternative 4 only because there are no alternatives that more liberally use the UI and II zones across larger portions of the city.	See response to comment 59-5.
71-22	EIS must do a better job establishing why areas change under each of the alternatives, and which areas should be treated as a cohesive cluster.	See response to comment 59-5.
71-23	At the neighborhood level, the proposed maps do not offer a picture of cohesiveness. What does it mean if blocks are divided?	See response to comment 59-6.
71-24	Alternative 1 should be considered a non-starter.	See response to comment 59-6.
71-25	City’s industrial boundaries carry the history of segregation that cannot be washed away with a cursory equity analysis.	See response to comment 59-7.
71-26	EIS doesn’t consider how boundaries of the current industrial zones came to exist.	See response to comment 59-7.
71-27	Impossible to develop policies that address land use and zoning issues without considering large areas of the city devoted exclusively to single-	See response to comment 59-7.

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Number	Comment Summary	Response
	family housing. EIS must more thoroughly consider equity impacts, including connecting Seattle's historic segregation, redlining, and exclusion to the present-day location of industrial uses, completing a citywide zoning analysis looking at commercial and multi-family exclusion in other areas, and examining which recommendations and boundaries are carried over from older plans that have never been vetted for equity or impact.	
71-28	EIS must make robust efforts to understand history and the sources of inequity in shaping land use decisions.	Comment is noted. See response to comment 59-5.
72	Kromm	Individual
72-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
73	Lau	Individual
70-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
74	Lewis	Individual
74-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
75	Livingston	Individual
75-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
76	Main	Individual
76-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
77	Mathison	Individual
77-1	Does not support IB zoning designation in Ballard Subarea and desires more housing alternatives.	The comment is noted and forwarded to City decision makers. Under the action alternatives IB zoning in Ballard would be replaced by a combination of UI or II zones. The UI zone would allow some expansion of allowances for industry-supportive housing under some of the alternatives.
78	Menin	Individual
78-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative

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		incorporate an increase in the maximum size of use for indoor sports and recreation uses.
79	Olofson	Individual
79-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
80	Perry	Individual
80-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
81	Personett	Individual
81-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
82	Phillips	Individual
82-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
83	Robinson	Individual
83-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
84	Shaffer	Individual
84-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
85	Shaw	Individual
85-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
86	Standifer	Individual
86-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
87	Strohmeier	Individual
87-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative

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Number	Comment Summary	Response
		incorporate an increase in the maximum size of use for indoor sports and recreation uses.
88	Sundquist	Individual
88-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
89	Wood	Individual
89-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
90	Anonymous	Individual
90-1	Compare historic segregation, redlining, and exclusion to present day location of industrial uses. Consider how constraints in non-industrial zones citywide lead to competition for industrial land.	The comment is noted. A new subsection in the Final EIS is added to the Overview of Historical Planning and Land Use Decisions in Section 3.8.1 .
90-2	Specify which groups of zoning changes within each alternative should be treated as divisible or as a cluster/group and why.	The EIS Action Alternatives include a range of different geographic patterns of zoning changes that take into account numerous context specific factors.
90-3	Ensure zoning around high capacity transit nodes extends out the full ½-mile in each direction.	The action alternatives apply II zoning in various extents from future transit stations to 1/2 mile and more in certain instances.
91	Schaefer	Cascade Bicycle Club
91-1	Process has not included citywide outreach and is happening independently from Comprehensive Plan update and STP processes. Request that industrial zoning changes should be wrapped into Comprehensive Plan process and that safety is paramount.	Thank you for your letter. See response to comment 4-29 regarding the EIS's approach and findings regarding safety. See Section 4.2.9 concerning coordination with the Comprehensive Plan major update.
91-2	(1) Critical to have feedback from people who walk, roll, and bike through industrial areas. (2) Planning for better access via non-auto modes opens opportunities to jobs and supports City mode shift goals. (3) Changes to industrial zoning addresses pollution and climate change issues.	(1) See responses to comments 91-3 and 91-4. (2) See response to comment 91-5, 91-6, and 91-7. (3) See response to comment 91-8.
91-3	Concern that changes to land use will be made before wider outreach around Comprehensive Plan and STP. Strategy assumes that the preservation of industrial land uses is the best and only outcome.	See Section 4.2.9 concerning coordination with the Comprehensive Plan major update process. The proposed alternatives include different combinations of potential zoning changes, some of which reduce the amount of industrially zoned lands and/or increase flexibilities for uses other than traditional industrial activities in the study areas.
91-4	Industrial areas are of particular concern because of key cycling routes, lack of street improvements, conflicts with large trucks etc.	The commenter's concerns about the challenges in the study area are noted. The EIS acknowledges the biking and walking conditions in the study area, and concludes the network gaps and conflicts between cars/trucks and vulnerable users would be a significant impact.

Number	Comment Summary	Response
91-5	Safe bike routes are attractive to potential employees; all industrial jobs should be accessible by walking, biking, and transit.	Comment noted. The City shares the goal of allowing for improved travel by non-auto modes. All modes are addressed in the EIS including mitigation measures to encourage travel by transit, walking, and biking.
91-6	Development standards should be updated to require frontage improvements that increase safety for walking and biking and planting of trees to reduce heat island effects.	Development standards including street improvement requirements would be updated for the proposed new zones under the action alternatives. The UI and II zones would have higher standards for frontage improvements compared to the zones they would replace. See also Appendix G for a more detailed discussion of development standards provided in the Final EIS.
91-7	Conduct more detailed existing land use analysis and consider corridors that could have more UI zoning or other non-industrial uses which could support a safer biking corridor from Georgetown to downtown.	Section 3.8 Land & Shoreline Use includes analysis of existing land uses. See response to 91-5.
91-8	Pollution and climate change are poorly addressed by all options.	Section 3.3.2 discusses the expected increase in traffic for all alternatives and states that improvements in vehicle standards and the application of stormwater requirements during redevelopment described in this and other sections of the EIS are expected to offset the increase in traffic and potentially lead to a net decrease in surface water pollution. See Section 3.3 Water Resources . Section 3.2.1 acknowledges that industrial uses contribute to air quality emissions that can affect human health. That section also discusses the regulatory framework for limiting air emissions. Section 3.2.3 cites possible mitigation measures for air emissions that include changes to the Seattle Comprehensive Plan and future MIC Subarea Plans recommending residences and other sensitive land uses (i.e., schools, day care) be separated from freeways, railways, and port facilities, and new MML, II, and UI zones by a buffer area of no less than 500 feet, and possibly as much as 1,000 feet, depending on the height of the source, to reduce the potential exposure of sensitive populations to air toxics. See Section 3.2 Air Quality & GHG . Appendix G also shows potential conceptual development regulations associated with the Preferred Alternative. The Preferred Alternative includes a basic 200 feet between truck routes to housing. Through the permit review process or SEPA review of site-specific proposals, the City can consider building and site design, topography, traffic volumes, and level of air emissions or noise and require a greater distance at a project level.
91-9	Concern that there are not commitments to mitigation measures.	Comment noted. See Section 4.2.7 concerning mitigation measures.
92	Fong	Center for Ethical Leadership
92-1	Consider working more closely with community leaders living in the impacted neighborhoods such as, Georgetown Community Council, King County International Community Coalition, and many others. Create a holistic, sustainable, and community-driven industrial lands strategy that addresses affordability, environmental impacts, and equity across Seattle.	Thank you for your letter. The comment is noted. OPCD will continue to pursue close community engagement with community members in Georgetown and South Park and other areas. This will include ongoing engagement after the Final EIS is issued and before any changes to land use policies or zoning are made. See also Section 4.2.8 concerning community engagement.
93	Duwamish River Accountability Group	

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Number	Comment Summary	Response
93-1	Concern that the Draft EIS did not consider impacts of industrial uses on residential community members in Georgetown and South Park. There are cultural artifacts in the Duwamish River flood plain. There need to be more green spaces and native trees in the area.	Thank you for your letter. The EIS contains an analysis of existing conditions and measurement of impacts under the alternatives for each element of the environment, such as Air Quality & GHG, Noise, etc. Section 3.11 Historic, Archaeological, & Cultural Resources includes an analysis of archaeological resources. The UI zone would have higher standards for landscaping and tree planting with new development than the zone it would replace under the alternatives.
94	Bush	Duwamish Valley Safe Streets
94-1	Isolated improvements fall quite short in providing the transformative vision for this area that is long overdue. The members of Duwamish Valley Safe Streets stand with our fellow community members in great concern that the process for this planning effort and strategy has not had a citywide outreach process and is happening independently from both the updates to the Comprehensive Plan and the new Seattle Transportation Plan.	Thank you for your letter. The comment is noted and forwarded to City decision makers. See Section 4.2.9 .
94-2	Community members face conflicts with large vehicles, poorly defined and unimproved roadways, lack of sidewalk, rough railroad tracks, and poor air quality. Commenter requests: (1) Feedback from community members who walk, bike, and use other non-motorized modes through industrial areas (2) Land use decisions led by environmental historical inequities (3) Integrate better planning for pedestrian and bicycle routes and public transportation investments	The commenter’s concerns about the challenges in the study area are noted. The EIS acknowledges the biking and walking conditions in the study area and concludes the network gaps and conflicts between cars/trucks and vulnerable users would be a significant impact. (1) See Section 4.2.8 . The Industrial and Maritime Strategy Council included persons with advocacy and expertise in transportation, including the Director of the Transportation Choices Coalition. (2) The EIS considers historic planning and inequities. See Sections 3.8.1 and 3.9.1 . (3) The EIS includes mitigation measures related to pedestrian and bicycle improvements as well as TDM measures that could include public transit programs geared toward the unique needs of the study area. Moreover, SDOT is currently in the process of developing the Seattle Transportation Plan which will integrate the City’s modal plans into a comprehensive vision for the citywide transportation network centered around the following values and goals: equity, safety, mobility, sustainability, livability, and excellence.
94-3	Pollution and climate change are poorly addressed by all options.	See responses to comments 97-4, 97-19, and 91-8.
94-4	While strategy provides for some adjustment in land uses in the industrial areas, the approach taken within this document falls short. We ask that any changes to industrial land uses should be wrapped into the process for the Comprehensive Plan and involve a more robust and equitable outreach effort.	The comment is noted and forwarded to City decision makers. See Section 4.2.9 .
95	Farrazaino	Equinox Development Unlimited LLC
95-1	Summary of comments. Appreciate opportunity to comment and extension of comment period. Support the Duwamish Tribe, Georgetown Community Council, etc,	Thank you for your letter. The comments are noted and forwarded to City decision makers.

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Number	Comment Summary	Response
95-2	Pause this process and take the time and actions needed to authentically engage all of the stakeholders to either validate the premise and details of this Draft EIS or create a new one.	See Section 4.2.8 .
95-3	Integrate the Industrial and Maritime Strategy and any potential Alternatives, including the No Action Alternative, into the Comprehensive Plan process.	See Section 4.2.9 .
95-4	Study the intersectional and cumulative impacts of the 14 affected environments in the Draft EIS and plan for and enact mitigation measures to address these exponentially more intense impacts.	See Section 4.2.7 .
95-5	Institute mechanisms to protect current community before, or in conjunction with, making zoning changes.	See Section 4.2.7 .
95-6	Inventory actual use of all properties to determine efficacy of potential changes or effects of no action.	See Section 3.8 Land & Shoreline Use , which includes parcel-specific land use maps.
95-7	Study the actual financial implications and market conditions to validate the efficacy of your assumptions and adjust the alternatives, either in location or development capacity, to suit the stated goals.	See Section 4.2.1 . SEPA does not require a cost-benefit or economic analysis. Note that SDOT is currently in the process of developing the Seattle Transportation Plan which will integrate the City's modal plans into a comprehensive vision for the citywide transportation network centered around the following values and goals: equity, safety, mobility, sustainability, livability, and excellence.
95-8	Need intersectional/cumulative approach to assessing the alternatives. Need inclusion and entrepreneurship. Need this to meet climate goals and environmental justice.	See Chapter 1 of the EIS including Section 1.7.15 which summarizes equity and environmental justice and highlights results of the environmental evaluation including air quality and sea level rise.
95-9	Study how no action or proposed alternatives tangibly and directly improve economic, environmental, and health disparities or continue the historic disenfranchisement of the Duwamish communities.	The EIS focuses on environmental impacts and addresses some subjects important for health including air quality and noise.
95-10	Studying an expansion of housing into the Industrial areas as a means to preserve existing manufacturing and jobs, create new modern manufacturing and industrial jobs, increase residential and commercial affordability, bring environmental investments, increase safety, and bring better outcomes for our BIPOC communities, should be done as soon as possible so potential benefits can be incorporated into our Comprehensive Plan process.	The comments are noted. See Section 4.2.10 .
95-11	Convene the Strategy Council and Community Based Organizations to identify and recruit stakeholders from all constituencies to form and maintain the stewardship entity now so it can carry this work forward with authentic engagement.	The comments are noted and forwarded to City decision makers. See also Section 4.2.8 .

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Number	Comment Summary	Response
96	Ramirez	Georgetown Community Council, King County International Airport Community Coalition
96-1	Significant change is needed to achieve a progressive, affordable, and sustainable strategy that meets the needs of Georgetown residents, small businesses, and workers. We look forward to your response, and we remain ready to collaborate on this effort.	Thank you for your letter. The comment is noted and forwarded to City decision makers.
96-2	The UI zone has the potential for increased affordability, sustainability, and equitable outcomes. However, areas proposed for UI under the alternatives would make no material changes. Other zoning options to create bigger buffers should be considered including Commercial zones.	Please see Section 4.2.6 regarding the UI zone and adjustments made in response to community input in the Preferred Alternative.
96-3	Study expansion of Commercial or Mixed Use zoning for more areas in and around Georgetown. Connect the neighborhood. Decrease the amount of MML zoning in and around Georgetown.	Please see Section 4.2.5 regarding an enlarged Mixed Use area in Georgetown.
96-4	Much of the land the City has zoned as MML has—in reality—been full of mixed uses for decades. Create a meaningful buffer zone between our residential areas, thriving commercial core, and heavy industry.	Analysis of existing land uses is included in the Land Use chapter, including quantitative data and narrative description. Please see Section 4.2.6 regarding the UI zone and adjustments made in response to community input in the Preferred Alternative.
96-5	A fundamental flaw of the Draft EIS process is that the accompanying mitigation measures are merely suggestions, and will not be put forward as binding legislation eventually passed by the City Council.	Please see Section 4.2.7 regarding mitigation measures.
96-6	The Draft EIS makes zoning changes that need accompanying policy commitments in order to maximize their impact. For example, rezoning part of Airport Way from Industrial to Mixed Use has lots of potential benefits for the neighborhood. However, it requires accompanying policies from the City—such as commitments regarding historic preservation and affordable housing—to ensure the zoning changes align with the policy intent of the neighborhood, and don't exacerbate affordability and equity issues.	The Final EIS includes additional details about proposed development standards that would be unique to the Georgetown area to address concerns raised by community members in this and other comment letters. Please see Sections 4.2.5 and 4.2.6 .
96-7	The GCC supports the Duwamish River Community Coalition's request for a year-long extension to the Draft EIS to allow for meaningful engagement with impacted residents.	Please see Sections 4.2.8 and 4.2.9 .
96-8	Fold the Draft EIS process into the Comprehensive Plan update.	Please see Section 4.2.9 .
97	Hampton-Clarridge	Georgetown Community Council, King County International Airport Community Coalition, Duwamish River Community

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Number	Comment Summary	Response
Coalition, Duwamish Valley Affordable Housing Coalition, Duwamish Valley Safe Streets		
97-1	<p>The Draft EIS is deeply connected to the history of white settlement, heavy industrialization, and discriminatory housing policies that have left the Duwamish Valley community fighting for the advancement of environmental and climate justice for decades to come.</p> <p>The City must remain accountable to its actions and prioritize the wellbeing of the Duwamish Valley community over industry and profit in the Industrial and Maritime Strategy.</p>	<p>Thank you for your letter.</p> <p>The history of City Planning & Land Use Decisions is found in Section 3.8.1 including how expansion of industry affects residents in the Duwamish Valley.</p> <p>The EIS includes an evaluation of equity and environmental justice in Section 1.7.15.</p> <p>Section 3.9 Housing addresses the relationship of housing and disparities including exposure to pollution. The EIS provides additional mitigation measures meant to address health and safety, (e.g., air quality, noise, light and glare, etc.). A complete list of mitigation measures is found in Final EIS Appendix J.</p>
97-2	<p>The Industrial and Maritime Strategy is an opportunity for the City of Seattle to right the wrongs set forth by the white settlement and early industrialists of the Seattle area, an issue of zoning and land use change.</p> <p>In addition, the strategy presents a unique opportunity for the City to reconfigure processes for on-going, low-barrier, multilingual community engagement regarding land use updates for a more inclusive and fair engagement process. More so, the Industrial and Maritime Strategy should not move forward independently of the Comprehensive Plan, Seattle Transportation Plan and Freight Master planning.</p>	<p>The comment is noted and forwarded to City decision makers.</p> <p>Regarding engagement, please see Section 4.2.8.</p>
97-3	<p>Long-standing advocacy on issues, such as industrial pollution, that remain unresolved and will be made worse by an increasing population and activities proposed by the Industrial and Maritime Strategy (alternatives 3 and 4).</p>	<p>Please see response to comment 97-1.</p>
97-4	<p>Concern that more housing will increase exposures to contaminants by more people. Encourages more legislation to increase environmental regulation standards.</p>	<p>Comment is noted. Refer to Section 3.5.1 that describes several robust regulatory frameworks (MTCA, CERCLA, RCRA) that converge to regulate site investigations and cleanup activities as well as proper use, handling, and offsite disposal of hazardous materials used by industry or generated during site cleanups. As experienced by this EIS section author, Ecology, EPA, and others are emphasizing careful review of all site cleanup and redevelopment projects near the Lower Duwamish Waterway superfund site to ensure that stormwater and dewatering water generated during construction are carefully managed, and site cleanup work meets the low cleanup levels necessary to prevent recontamination of areas previously cleaned up. Ecology is also highly engaged and aware of the importance of the public participation process.</p>
97-5	<p>To protect and support industry and Port operations without procedural justice and higher environmental standards for the residential communities of South Park and Georgetown ignores the reality of today and should not be acceptable to any of us.</p>	<p>Please see response to comment 97-1.</p>

Number	Comment Summary	Response
97-6	This letter first explains why strong environmental standards and meaningful engagement of the diverse Duwamish Valley community is necessary to eliminate negative cumulative health impacts experienced everyday, and why the Draft EIS must check the integrity of its data analysis and mitigation measures to eliminate bias and injustice towards a community that has long been affected by racism rooted in environmental and land use planning and policy.	Please see response to comment 97-1.
97-7	The significance of including the history of the Duwamish River and segregation in the City of Seattle is to shed light on the intersectional nature of land use and zoning change and its role in discriminatory practices that still impact Seattle today.	Please see response to comment 97-1.
97-8	Exposure to odors and noise.	EIS Section 3.2.1 acknowledges that industrial uses contribute to air quality emissions, including odors. That section also discusses the regulatory framework for limiting air emissions. Section 3.2.3 cites mitigation measures in the form of regional regulations by PSCAA for emission controls to minimize fugitive dust and odors during construction, permitting of stationary air pollutant sources. See Section 3.2 Air Quality & GHG . Section 3.6 Noise discusses potential noise impacts associated with implementing the alternatives; 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; an assessment of noise impacts associated with each alternative, as well as potentially feasible noise mitigation measures where appropriate. Maps illustrating exposure to pollution are included in EIS Section 3.9 .
97-9	Comprehensive rules for increased environmental standards and protections from displacement driven by market forces must be enacted.	Comment is noted. See response to comment number 97-4.
97-10	Air quality and health.	Section 3.2.1 acknowledges that industrial uses, including associated diesel-related emissions from industrial use trucks, contribute to air quality emissions that can affect human health. That section also discusses the regulatory framework for limiting air emissions. Sections 3.2.3 and 3.9.1 include a discussion of the Duwamish Valley’s ranking on the Washington State Department of Health (DOH) health disparities map (DOH 2021). Section 3.2.3 discusses mitigation measures for air emissions in the MICs, including the Duwamish Valley, that identify strategies to reduce the potential for exposure of existing and new employees, residents, and visitors to potential air emissions, including metals, in areas around arterials, along industrial buffers, and near port operations. See Section 3.2 Air Quality & GHG .
97-11	Inaccuracy on access to parks and open space in Georgetown and South Park.	Exhibit 3.12-10 referenced by the commenter is sourced from the Seattle Duwamish Valley Action Plan and indicates a relatively

Number	Comment Summary	Response
97-12	Air particulates and air quality monitoring network in the Duwamish Valley.	<p>nigner percentage or access to public space in South Park and Georgetown than Citywide. That exhibit is followed by text acknowledging a need for improved parks and open space access in South Park and Georgetown: <i>“While the neighborhoods have nearby parks, the total acreage per capita is half the citywide average and there may be park congestion caused by added population. Another factor related to park pressure and park access is being able to travel to and from the parks.”</i></p> <p>The Potential health impacts of particulate matter are discussed in Section 3.2.1 Air Quality & GHG, Pollutants of concern. Additional text has been added to include fugitive roadway dust as a source of particulate matter. The potential for fugitive dust emissions associated with soil-disturbing activities, demolition and construction work, and grading are discussed in general in Section 3.2.2, Construction Related Emissions. The potential for vehicle travel to generate PM2.5 from road dust is discussed in Section 3.2.2, Impacts of Alternative 1, Transportation Related Emissions. Discussion under Transportation Related Emissions for alternatives 2, 3, and 4 compare emissions to Alternative 1. Additional text is added in each of these sections to include the potential generation of dust associated with increased vehicle miles traveled. Additional text is added to Section 3.2.3 regarding increased street sweeping to prevent impacts from fugitive dust.</p> <p>This non-project EIS provides an assessment of the existing levels of regulated pollutants and compliance with the NAAQS, and anticipated air emissions associated with potential land use changes based on two sources of baseline ambient air quality conditions data: 1) from Ecology- and PSCAA-operated ambient air quality monitoring stations; and 2) from air quality data collected directly by The City of Seattle at eight sites within the BINMIC and Greater Duwamish MIC—selected due to the location of potential zoning changes in alternatives or due to their proximity to air quality emission sources. All data indicate that air pollutant concentration trends, and individual measurements, for these pollutants remain below the NAAQS when wildfire is excluded.</p> <p>As described in Section 3.2.1, the Puget Sound Clean Air Agency (PSCAA) has local authority for setting regulations and permitting of stationary air pollutant sources and construction emissions. PSCAA and Ecology maintain and operate a network of ambient air quality monitoring stations measuring the levels of criteria pollutants found in the atmosphere throughout the region, with the Ecology-operated site at 10th and Weller the closest network station to the Interbay-Ballard subarea (https://secure.pscleanair.org/AirQuality/NetworkMap). In addition, PSCAA maintains an air quality sensor map that displays calibrated data for a variety of pollutants, measured by lower-cost portable air quality devices, including dust, fine particulate matter, carbon dioxide, carbon monoxide, ozone, nitrogen oxide, and others (http://map.pscleanair.org/?lat=47.6768311&lon=-122.4756425&z=9). These air sensors are intended to be educational and are non-regulatory, meaning that they cannot be used for permitting, compliance, policy, or interpretation of health effects. The data from these sensors are not owned by PSCAA.</p> <p>Text has been added to Section 3.2.3 to suggest consideration of a City-owned and operated air monitoring station in the Duwamish Valley to provide the public with access to daily air monitoring data.</p>

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97-13	VMT related to air quality	Air Quality & GHG Section 3.2.1 acknowledges that industrial uses, including associated diesel-related emissions from industrial use trucks, contribute to air quality emissions. Section 3.2.2 discusses the anticipated VMT under each of the alternatives and the associated potential impacts on air emissions in Transportation Related Emissions. Baseline ambient air quality conditions data is presented: 1) from Ecology and PSCAA-operated ambient air quality monitoring stations; and 2) from air quality data collected directly by The City of Seattle at eight sites within the BINMIC and Greater Duwamish MIC—selected due to the location of potential zoning changes in alternatives or due to their proximity to air quality emission sources. Modeled vehicle VMT (see Section 3.10 Transportation) is used to project anticipated air emissions from transportation sources based on emission factors reflecting future improvements to the vehicle fleet using the AFLEET tool (2020 version) and data from the EPA MOVES2014b model. All data indicate that air pollutant concentration trends, and individual measurements, for these pollutants remain below the NAAQS when wildfire is excluded.
97-14	Concern about lack of meaningful engagement to reach diversity of Duwamish Valley Community.	See Section 4.2.8 .
97-15	It is concerning that mitigation recommendations for the Draft EIS are not true commitments considered by the Strategy.	See Section 4.2.7 .
97-16	Air Quality and increased GHG emissions.	Section 3.2 Air Quality & GHG discusses the significance of anticipated GHG emissions. It concludes that “through mitigation implementation, local and state climate actions, and expected continued regulatory changes, the alternatives may result in a decrease of the growth in GHG emissions [due to population and employment growth] such that the impacts from future development allowed by the changes in plans and zoning could be considered less than significant for SEPA. As proposed, the alternatives would not prevent or deter efforts to reduce emissions in comparison to local or regional goals or targets for GHG reductions.”
97-17	Air Pollution and mitigation.	The comment is noted. Section 3.2.3 Air Quality & GHG discusses mitigation measures for air emissions in the MICs that identify strategies to reduce the potential for exposure of existing and new employees, residents, and visitors to potential air emissions in areas around arterials, along industrial buffers, and near port operations.
97-18	Displacement: The description of risk of displacement does not reflect community concerns regarding displacement pressures and affordability.	The displacement analysis in Section 3.9 Housing uses the City’s Displacement Risk Index and Access to Opportunity Index. It also considers the limited housing within the MIC boundaries of around 413 dwellings across the nearly 7,000 acres. The compatibility concerns between industrial uses and abutting residential areas outside the boundaries is addressed in Section 3.8 together with mitigation measures. Section 3.9 Housing also provides for mitigation measures to address the potential for employment growth to shift housing demand, and apply MHA regulations, in the II zone.

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		The Preferred Alternative responds to concerns about Georgetown arts and culture displacement and housing needs. See Section 4.2.5 .
97-19	Impacts of sea level rise and additional threats of climate change must be taken more seriously throughout all mitigation areas.	Sea level rise is addressed through existing regulations as discussed in Section 3.3.2 . Subareas sensitive to sea level rise are discussed in this section, along with mitigation measures in Section 3.3.3 . Given the non-project nature of this EIS, Section 3.3 Water Resources provides an appropriate level of detail on the risk and impact of development related to sea level rise. Subsequent developments that may arise from the proposed land use changes in the Industrial and Maritime Strategy will be required to meet all applicable codes and regulations, and to conduct project-level SEPA review at that time, in which analysis will be conducted to assess site specific impacts and necessary mitigation measures.
97-20	Fairness in zoning: Increase mixed-use areas in Georgetown and South Park to allow for a larger percentage of community-driven anti-displacement efforts.	Alternatives 3 and 4 provide for areas of Mixed Use in Georgetown and South Park. The Mixed Use area is increased in the Preferred Alternative in Georgetown. See Final EIS Chapter 2 description of the Preferred Alternative as well as Section 4.2.5 .
97-21	Send a companion binding legislation to the City Council that codifies and funds recommended mitigation measures.	The comment is noted and forwarded to City decision makers. Please see Section 4.2.7 .
97-22	The Draft EIS must consider an additional alternative that reflects all the priorities of the community for a fair consideration of proposed alternatives. Commit to continued community engagement. Expand buffers and UI zoning. Commit to mitigation measures. Increase credibility of data. Slow down EIS process. Address pollution. Fold the EIS into the Comprehensive Plan.	Please see the description of the Preferred alternative that expands UI buffers and adds Mixed Use. Regarding specific EIS topics and information please see responses 97-1 to 97-21. See also: <ul style="list-style-type: none"> ▪ Community Engagement (Section 4.2.8) ▪ Mitigation Measures Commitment (Section 4.2.7) ▪ Strategy and Comprehensive Plan (Section 4.2.9)
97-23	The community continues to wait for equitable safeguards from neighboring polluters while business as usual continues. This chronic issue must be addressed and land use change presents a unique opportunity to rezone more spaces for the community in order to restore environmental health and champion placekeeping, economic justice and resilience. We strongly recommend the City of Seattle commit to frequent and authentic community engagement around land use in order to strengthen environmental standards. Prioritize the recommendations of the Duwamish Valley community.	See response to comment 97-22.
98	Davidson	Georgetown Merchants Association
98-1	Concern about the public engagement process.	Thank you for your letter. The comment is noted. See Section 4.2.8 concerning public engagement.
98-2	Request for more specific information on proposed zoning boundaries and mitigations that could address displacement.	The comment is noted. The EIS contains a detailed zoning map for each of the proposed alternatives found in Appendix C , and reviewable in the online story map . Increased detail about proposed development standards is contained in the Final EIS in Appendix G , including a subsection describing development

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Number	Comment Summary	Response
		standards specific to the mixed use area of Georgetown under the Preferred Alternative.
98-3	Consider systemic impacts.	For each element of the environment (EIS Chapter 3) consideration is given to cumulative impacts.
98-4	We ask for more focus on public safety, acknowledgement of public safety issues in Georgetown, and commitments to public safety as a part of any changes that are made.	Impacts from the proposal to public services including police response times are included in Section 3.13 Public Services . The City acknowledges that existing public safety concerns in industrial area are a high priority for many stakeholders in those areas. Although addressing existing public safety challenges is a part of the broader Industrial and Maritime Strategy, this topic is separate from the land use actions that are the focus of the proposed action.
99	Bookwalter	Georgetown Youth Council
99-1	Supports the Georgetown Community Council's comment letter.	Thank you for your letter. The comment is noted and forwarded to City decision makers. See responses to letter 96.
100		Seattle Bicycle Advisory Board
100-1	Process has not included citywide outreach and is happening independently from Comprehensive Plan update and STP processes. Request that industrial zoning changes should be wrapped into Comprehensive Plan process and that safety is paramount.	Thank you for your letter. See response to comment 4-29 regarding the EIS's approach and findings regarding safety. See Section 4.2.9 concerning coordination with the Comprehensive Plan major update.
100-2	(1) Critical to have feedback from people who walk, roll, and bike through industrial areas. (2) Planning for better access via non-auto modes opens opportunities to jobs and supports City mode shift goals. (3) Changes to industrial zoning addresses pollution and climate change issues.	See responses to comment 91-2
100-3	Concern that changes to land use will be made before wider outreach around Comprehensive Plan and STP. Strategy assumes that the preservation of industrial land uses is the best and only outcome.	See response to comment 91-3. See Section 4.2.9 concerning coordination with the Comprehensive Plan major update process.
100-4	Industrial areas are of particular concern because of key cycling routes, lack of street improvements, conflicts with large trucks etc.	The commenter's concerns about the challenges in the study area are noted. See response to comment 91-4.
100-5	Safe bike routes are attractive to potential employees; all industrial jobs should be accessible by walking, biking, and transit.	See response to comment 91-5.
100-6	Development standards should be updated to require frontage improvements that increase safety for walking and biking and planting of trees to reduce heat island effects.	See responses to comment 91-6.
100-7	Conduct more detailed existing land use analysis and consider corridors that could have more UI zoning or other non-industrial uses which could support a safer biking corridor from Georgetown to downtown.	Section 3.8 Land & Shoreline Use includes analysis of existing land uses. See response to comment 91-5.

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Number	Comment Summary	Response
100-8	Pollution and climate change are poorly addressed by all options.	See response to comment 91-8.
100-9	Concern that there are not commitments to mitigation measures.	Comment is noted. See Section 4.2.7 concerning mitigation measures.
101	Schwartz	South Park Neighborhood Association (SPNA)
101-1	Request for a year-long extension to the Draft EIS to allow for meaningful engagement with impacted residents. Outreach must also be accessible to non-native English speakers.	Thank you for your letter. The comment is noted and forwarded to City decision makers. Please see Section 4.2.8 .
102	Simson	Urban Systems Design
102-1	<p>The Draft EIS and overall strategy falls significantly short of meeting the needs and priorities of Georgetown and South Park residents, small businesses, and workers.</p> <ul style="list-style-type: none"> ▪ Privileges future growth of industrial and maritime usages over actual creative industries proven to support and sustain local businesses; the consequences could mean the end of Seattle’s legacy as an art and cultural center ▪ Insufficient study of impacts on existing vital arts and culture resources in the district ▪ All alternatives reduce or eliminate potential affordable housing ▪ Shows lack of consideration towards existing communities, families, and small business ▪ Threatens the future of core working art space which could sorely limit intrinsic creative resources 	<p>Thank you for your letter. The EIS recognizes the lack of small or affordable space and housing for makers, creatives, and artists. Alternatives 3 and 4 and the Preferred Alternative address expanding allowances for limited industry-supportive housing such as caretakers’ quarters and maker studios. Alternative 3 includes an estimated additional 610 limited industry supportive housing units in industrial zones. The Preferred Alternative would have an estimated 3,009 units across the full study area. The housing would be available to business owners or employees of an on-site business that is an industrial use, or available to artists/makers with a business license in live-work spaces. Live/workspaces contain area for production/art/making activities that are physically connected to residential space.</p> <p>The Preferred Alternative specifically addresses this issue with the new Mixed Use zone in the triangle area of Georgetown by creating incentives for retention, restoration, and reuse of historic-period buildings and arts organizations and/or art studios.</p> <p>See also Section 4.2.5 concerning retention of arts and cultural spaces in Georgetown.</p>
102-2	UI has potential to increase affordability. Concern that the proposed UI zoned areas in Georgetown will not lead to material changes. Suggestion that more areas in Georgetown should be studied for a change to Commercial or mixed use zoning.	The comment is noted. See Section 4.2.6 concerning larger buffer areas and conversion of more land from MML zoning in and around Georgetown.
102-3	Suggestion to shift the Industrial and Maritime Strategy process into the Comprehensive Plan major update.	The comment is noted. See Section 4.2.9 concerning coordination with the Comprehensive Plan major update.
102-4	Requests rejection of all alternatives.	Comment is noted.
102-5	Increase study of and consideration for arts and cultural resources in Georgetown.	See response to 97-1 above, and response to frequent comment theme concerning arts and culture in Georgetown.
103	Benetua	Individual
103-1	Automatic vacation response.	Comment is noted.
104	Bookwalter, E.	Individual
104-1	Supports the Georgetown Community Council’s comment letter and requests process be folded into the Comprehensive Plan update.	Thank you for your letter. The comment is noted and forwarded to City decision makers. See responses to letter 96.

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Number	Comment Summary	Response
105	Bookwalter, M.	Individual
105-1	Supports the Georgetown Community Council's comment letter and requests process be folded into the Comprehensive Plan update.	Thank you for your letter. The comment is noted and forwarded to City decision makers. See responses to letter 96.
106	Bushue	Individual
106-1	Concern about conflict of interest with Ram Mounts/National Products.	Thank you for your letter. The comment is noted and forwarded to City decision makers.
106-2	Concern about conflict of interest with Ram Mounts/National Products.	Comment is noted.
106-3	Concern about conflict of interest with Ram Mounts/National Products.	Comment is noted.
107	Carpenter	Individual
107-1	Supports the Georgetown Community Council's comment letter. Remove areas from MML to UI, MU, or Commercial: Orcas / E Marginal / Corson, Corson and Elysian Brewing, Airport Way S to S Lucille and other side of Airport Way. Have binding legislation to Council to codify mitigation measures. Commit to affordable housing and affordable housing.	Thank you for your letter. Comment is noted. See Section 4.2.6 concerning buffers and conversion of more MML land to other zones. See Section 4.2.7 concerning mitigation measures. See also responses to letter 96.
108	Claxton	Individual
108-1	Request for less heavy industrial and more housing. Supports the Georgetown Community Council's comment letter.	Thank you for your letter. The comment is noted and forwarded to City decision makers. The Action Alternatives propose targeted changes regarding housing, buffers to neighborhoods, and mitigation measures related to air quality, noise, sea level rise, and others. See also Sections 4.2.3, 4.2.5, 4.2.6, 4.2.7 . See also responses to letter 96.
109	Cocking	Individual
109-1	Include the Draft EIS process with the upcoming Seattle Comprehensive Plan update.	Please see Section 4.2.9 .
109-2	Clarify relationship of the Strategy with King County "sliver" annexation. What is role of the Port?	The sliver is identified as a possible future annexation area for the City; however, no timeline or specific plan for a possible future annexation is known at this time. The EIS considers existing conditions and existing plans and zoning within the sliver as a part of the affected environment. However, no changes to the sliver are proposed as a part of the alternatives.
109-3	This 'Plan' does nothing to help alleviate the toxic activities of industry and its encroachment into the healthier residential yards where homes exist.	Please see EIS Sections 3.8 Land & Shoreline Use, 3.9 Housing, 3.2 Air Quality & GHG, and 3.5 Contamination regarding industry and mitigation measures addressing compatibility and housing. The Preferred Alternative also expands the UI zone buffering uses, and mixed uses along boundaries of Georgetown and South Park. This is described in Chapter 2 of the Final EIS, as well as comment themes in Sections 4.2.3, 4.2.5, and 4.2.6 .
109-4	Plan does not adequately address South Park zoning. It is not just a village. Residential UV was to stem rezoning to industrial. Work experiences by industrial workers are also missing in this study.	Please see the description of historic planning and inequity in Section 3.8.1 Land & Shoreline Use . Action alternatives including the Preferred Alternative do not expand MIC boundaries. Action alternatives make targeted adjustments to add Mixed Use in Georgetown and South Park. The

Number	Comment Summary	Response
		<p>Preferred Alternative provides for more mixed use in Georgetown. The Preferred Alternative expands UI buffering near Georgetown and South Park. See Sections 4.2.5 and 4.2.6. Please also see the commitment to mitigation measures in Section 4.2.7.</p> <p>Regarding workers in study area see response to comment 116-2.</p>
109-5	<p>Georgetown is lumped together with us too called our shared subarea. Each community faces different impacts and is different. Georgetown is not a Residential Urban Village. Why are we...? South Park has most IG zones and one or two buffer areas.</p>	<p>Different existing conditions and impacts for Georgetown and South Park are discussed in the Land Use chapter. For other aspects such as employment projection, it is not practical to disaggregate analysis to smaller geographies. South Park has been designated an urban village in the City's Comprehensive Plan for over 20 years. Designations as urban village growth areas are made as part of major comprehensive plan updates.</p>
109-6	<p>There should be emphasis on keeping the South Park residential area "green" to help mitigate the air quality and pollution here and there.</p>	<p>See EIS Sections 3.2 Air Quality & GHG and 3.12 Open Space & Recreation.</p>
109-7	<p>If South Park actually is an Urban Village then how convenient a motivation for you to shove more inappropriate dense housing into our green yards. correct existing zone designations in the residential area: (1) Remove Residential Urban Village status for South Park, Return to RS 5000 and include owner-occupied property be a must when making DADU or ADU on the property, and (2) do not allow Residential Small Lot zoning in South Park in order to avoid overbuilding on the already existing small lots here,</p>	<p>Regarding development in Urban Villages the City will consider housing needs across the City in the Comprehensive Plan Update as described in Section 3.9.3. No changes to South Park residential zoning is proposed with the Industrial and Maritime Strategy.</p>
109-8	<p>Concerned about the proposed buffer zones between the industrial areas (UI, II, MML) and residential areas. Perhaps a more substantive buffer like Commercial 2 might be more effective for a transition between heavy industry and residential areas.</p>	<p>Comment noted. The alternatives study different combinations of zoning changes. Removal of land from MICs for placement in a non-industrial zone such as Commercial 2 are limited to focused locations to ensure consistency with the proposal's objectives.</p>
109-9	<p>Residents shouldn't have to monitor the developers and industrial neighbors but that is what it boils down to.</p>	<p>Comment noted. Discussion of increased coordination and effectiveness of enforcement by agencies is included in mitigations measures sections.</p>
109-10	<p>In order for 'urban industrial' to work, extensive testing and cleanup of buildings (reused) and land will need to be done. Environment and habitat will have to be healed through planting native plants and trees.</p>	<p>Please see Sections 3.4 Plants & Animals and 3.5 Contamination.</p>
109-11	<p>Treasure the RS 5000 lands and value them for their mitigation of the detrimental IG zones surrounding the yards and old homes in RS 5000. Don't apply inappropriate densities and MHA rezones.</p>	<p>No changes to South Park residentially zoned areas are proposed as a part of this action.</p>
109-12	<p>Stop trying to sacrifice South Park for new development either industrial or dense residential. Naturally occurring more affordable home ownerships that do not destroy the small</p>	<p>No changes to South Park residentially zoned areas are proposed as a part of this action.</p>

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Number	Comment Summary	Response
	town historic character of South Park should be encouraged	
110	Dae	Individual
110-1	UI zone concept has potential to improve connectivity between residential and heavy industrial use areas.	Thank you for your letter. The comment is noted and forwarded to City decision makers.
110-2	Proposed UI zoned areas in Georgetown are not likely to see land use changes.	See Section 4.2.6 .
110-3	There aren't enough proposed UI zoned areas near Georgetown. More Commercial 2 zoned areas would provide a buffer.	The comment is noted. See Section 4.2.6 concerning buffer areas and reduction of MML zones in Georgetown.
110-4	Study expansion of more mixed use and Commercial 2 zoned areas.	The comment is noted. See Section 4.2.6 concerning buffer areas and reduction of MML zones in Georgetown.
110-5	Increase the area of zone changes around Georgetown to better connect the neighborhood. Create larger buffer areas.	The comment is noted. See Section 4.2.6 concerning buffer areas and reduction of MML zones in Georgetown.
110-6	Study replacing more MML zoned areas with UI, Commercial or mixed use zoning. Specific areas are noted in the comment.	The comment is noted. See Section 4.2.6 concerning buffer areas and reduction of MML zones in Georgetown.
110-7	Study replacing more MML zoned areas with UI, Commercial or mixed use zoning. Specific areas are noted in the comment.	The comment is noted. See Section 4.2.6 concerning buffer areas and reduction of MML zones in Georgetown.
110-8	Accompany the Final EIS with legislation committing the City to fund mitigation measures. Concern that mitigation measures are only suggestions.	The comment is noted. See Section 4.2.7 concerning commitments to mitigation measures.
110-9	Accompany the Final EIS with legislation committing the City to fund mitigation measures. Concern that mitigation measures are only suggestions.	The comment is noted. See Section 4.2.7 concerning commitments to mitigation measures.
110-10	Extend the EIS process for a year. Concern that engagement has been with traditional stakeholders with power and influence.	The comment is noted. See Section 4.2.8 concerning the community engagement process.
110-11	Shift the process into the Comprehensive Plan major update.	The comment is noted. See Section 4.2.9 concerning coordination with the Comprehensive Plan major update.
111	Del Rio	Individual
111-1	Concerned the Draft EIS falls short of meeting needs of Georgetown residents, small businesses, and workers. Specifically, insufficient study of impacts on arts and cultural resources, reduction/elimination of existing affordable housing, lack of consideration towards existing communities, privileges future growth of industrial/maritime usages	Thank you for your letter. The EIS recognizes the lack of small or affordable space and housing for makers, creatives, and artists. Alternatives 3 and 4 addressed expanding allowances for limited industry-supportive housing such as caretakers' quarters and maker studios. Alternative 3 includes an estimated additional 610 limited industry supportive housing units in industrial zones, and Alternative 4 would have an estimated 2,195 units across the full study area. The housing would be available to business owners or employees of an on-site business that is an industrial use, or available to artists/makers with a business license in live-work spaces. Live/workspaces contain area for production/art/making activities that are physically connected to residential space.

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		The Preferred Alternative specifically addresses this issue with the new mixed use zone in the triangle area of Georgetown by creating incentives for retention, restoration, and reuse of historic-period buildings and arts organizations and/or art studios. See also Section 4.2.5 concerning arts and culture in Georgetown.
112	Facundo	Individual
112-1	Supports the Georgetown Community Council's comment letter.	Thank you for your letter. The comment is noted and forwarded to City decision makers. See responses to letter 96.
113	Gallagher	Individual
113-1	Supports the Georgetown Community Council's comment letter and requests process be folded into the Comprehensive Plan update.	Comment is noted. See responses to letter 96.
114	Kirschenbaum	Individual
114-1	Disappointed by comment process. Proposed changes are marginal at best and favor the large industrial enterprises. The status quo has many current and future issues involving affordable housing, the lack of food and medical resources, traffic, pollution, crime, further effects of climate change, to mention just a few. None of these are seriously addressed in the zoning proposals.	Thank you for your letter. The comment is noted and forwarded to City decision makers. The comment period was extended and more engagement opportunities were provided. Please see Section 4.2.8 . The Preferred Alternative integrates changes based on input from the South Park and Georgetown communities. See Chapter 2 of the Final EIS, as well as Sections 4.2.5 and 4.2.6 . The EIS addresses 14 environmental topics including traffic (Section 3.10), pollution (Section 3.2 Air Quality & GHG), Contamination (Section 3.5) , Housing (Section 3.9) demand for police (Section 3.13), sea level rise (Section 3.4) and others. Mitigation measures are proposed. See also Section 4.2.7 .
114-2	Many other issues such as impact on cultural, historic, and archaeological resources and community character and quality are not adequately addressed.	See Section 3.11 Historic, Archaeological, & Cultural Resources . The City utilizes all applicable laws and ordinances with respect to impacts to cultural, historic, and archaeological resources. The SEPA process and/or cultural resources review, including architectural and archaeological survey, are completed prior to the start of many projects, and includes consultation with Tribes. Many federal, state, and local statutes and ordinance require notice and consultation with affected Tribes before, during, and after project review. The National Historic Preservation Act (NHPA) of 1966, was amended in 1986 with provisions for consultation with affected Tribes and 1992 to include and clarify the roles and responsibilities of Indian Tribes in Section 106 reviews. All cultural resources survey and archaeological work will follow best practices and standard archaeological techniques in the discovery and preservation of cultural and historical artifacts. The EIS scoping process and Draft EIS comment period included tribes. See also responses to letter 1 received from the Duwamish Tribe.
114-3	Arts and culture scene has grown due to affordable workspace and vision.	The comment is noted. Please also see Section 4.2.5 .
114-4	Expand the scope and vision of your efforts beyond just zoning to include plans and policies that encourage and support holistic growth for the whole community.	The comment is noted. The Preferred Alternative has been developed to respond to community needs and desires. Please see Chapter 2 of the Final EIS. Please also see proposed Comprehensive Plan policies in EIS Appendix C .
115	Knowles	Individual

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Number	Comment Summary	Response
115-1	Supports the Georgetown Community Council's comment letter.	Thank you for your letter. The comment is noted and forwarded to City decision makers. See responses to letter 96.
116	Krejci	Individual
116-1	We have before us an opportunity to do things differently, to address past and prevent future harm. Zoning dictates investment. Government's greatest role is that of convener and facilitator. Bold, innovative ideas are born in the differences of perspectives. I support the comments made by the Georgetown Community Council and the Duwamish River Cleanup Coalition.	Please see Chapter 2 of the Final EIS for a description of how the Preferred Alternative responds to community requests regarding zoning. Please also see Section 4.2.5, 4.2.6, and 4.2.8 . See also responses to letter 96.
116-2	Who works in our industrial areas? This requires a review of disaggregated data by race, gender, age, and location to truly understand who works in the Duwamish MIC. Who benefits from ownership of industrial land? Who owns the land by race and gender?	Data about workers' home location is addressed in Section 3.9 Housing , see Exhibit 3.9-12 . Additional information regarding worker race, gender, and age is included in Section 3.9 of the Final EIS using 2019 Census on the Map information. Results show workers are primarily aged 30-54 (56.2%), earn more than \$3,333 (65%), two thirds white and one third persons of color (34.7%), and two thirds male and one third female (34.3%). Ownership of land by race and gender is not available.
116-3	Future expansion plans of the King County International Airport (KCIA) and the cumulative effect on the health of workers and residents in the Duwamish.	Future expansion plans of the KCIA are outside the scope of this proposal and would require their own review under the State Environmental Policy Act.
116-4	What is the current impact to industry of the current uses (not zoning) in the IG zones from Airport Way S to 1st Ave S? While the proposed industrial maritime zoning strategy recommendations are an improvement to the one-size-fits-all proposed in previous studies, they fail to provide a meaningful evaluation of Georgetown as an industrial neighborhood as a whole.	Existing land use conditions are described in the affected environment portion of the Land Use section. Effects on the Georgetown neighborhood are evaluated at the neighborhood scale to the extent that such analysis is practical. The Preferred Alternative includes unique development standards for new mixed use areas in Georgetown, and the City would continue to collaborate with community members on the content of those standards before adoption.
116-5	What is the future of industry? What does it look like—Amazon warehouses? Large-scale manufacturing? What are the wages of these jobs? Who benefits and who doesn't?	See the Seattle Maritime and Industrial Strategy Updated Employment Trends and Land Use Alternatives Analysis , December 22, 2020.
116-6	The Draft EIS makes zoning changes that need accompanying policy commitments in order to maximize their impact and enforce mitigation measures.	See Section 4.2.7 .
116-7	Allow for more engagement through the Comprehensive Plan and Seattle Transportation Plan.	See Sections 4.2.8 and 4.2.9 .
117	Lanen	Individual
117-1	Concern about public engagement process.	Thank you for your letter. Comment is noted. See Section 4.2.8 concerning community engagement.
117-2	Concern that the alternatives are too limited or don't address Georgetown residents' needs.	Comment is noted. See Sections 4.2.5, and 4.2.6 concerning Georgetown.

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Number	Comment Summary	Response
117-3	Supports the GCC letter.	Comment is noted. See Sections 4.2.5 , and 4.2.6 concerning Georgetown and responses to letter 96.
118	Madison	Individual
118-1	Reject the EIS alternatives. Study impacts an arts and cultural resources. Alternatives would eliminate potential affordable housing. Increase engagement. Arts spaces are threatened. Privileges future growth of industrial and maritime uses over arts and cultural uses.	Thank you for your letter. The comment is noted. See Section 4.2.5 concerning arts and cultural communities in Georgetown.
119	Medina	Individual
119-1	Supports the Georgetown Community Council's comment letter.	Thank you for your letter. The comment is noted. See responses to letter 96.
119-2	Consider the flooding risks and consider the impact these plans could have to cause more environmental harm.	Section 3.3 Water Resources addresses potential for flooding risks and includes analysis of impacts in light of potential sea level rise.
119-3	Create possibilities for indigenous sovereignty and real environmental justice.	The comment is noted. Although the suggestion is beyond the scope of the EIS on the proposed action, equitable development measures targeted to supporting indigenous groups are discussed under Mitigation Measures in Section 3.8.3 Land & Shoreline Use .
120	Miller	Individual
120-1	Supports the Georgetown Community Council's comment letter.	Thank you for your letter. The comment is noted and forwarded to City decision makers. See responses to letter 96.
121	Morrison	Individual
121-1	Concerned that proposed strategies do not take into account the economic and cultural value that the arts and artisans of Georgetown provide to Seattle.	Thank you for your letter. The EIS recognizes the lack of small or affordable space and housing for makers, creatives, and artists. Alternatives 3 and 4 addressed expanding allowances for limited industry-supportive housing such as caretakers' quarters and maker studios. Alternative 3 includes an estimated additional 610 limited industry supportive housing units in industrial zones, and Alternative 4 would have an estimated 2,195 units across the full study area. The housing would be available to business owners or employees of an on-site business that is an industrial use, or available to artists/makers with a business license in live-work spaces. Live/workspaces contain area for production/art/making activities that are physically connected to residential space. The Preferred Alternative specifically addresses this issue with the new mixed use zone in the triangle area of Georgetown by creating incentives for retention, restoration, and reuse of historic-period buildings and arts organizations and/or art studios. See also response to frequent comment theme concerning arts and culture in Georgetown.
121-2	Concern that the proposed alternatives would threaten arts space and affordable housing.	The comment is noted. See Section 4.2.5 concerning arts and culture in Georgetown and response to 121-1.
122	Neil	Individual
122-1	Concerns that the proposed alternatives do not include enough buffering between residential	Thank you for your letter. Comment is noted. See Section 4.2.6 about buffering and conversion of more MML zoned land.

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Number	Comment Summary	Response
	areas of Georgetown and heavier industrial areas.	
122-2	Concern that the proposal does not include commitments to mitigation and that there are not enough assurances that affordable housing will be provided or that historic resources will be retained.	The comment is noted. See Section 4.2.7 concerning mitigation measures, and Section 4.2.5 concerning arts and culture in Georgetown. See also response to 97-1.
122-3	Suggestion to shift the Industrial and Maritime Strategy process into the Comprehensive Plan major update.	The comment is noted. See Section 4.2.9 concerning coordination with the Comprehensive Plan major update.
123	Nyland, Kathy	Individual
123-1	Had similar comments in 2007. Draft EIS was issued in December 2021 during holidays, without people in mind.	Thank you for your letter. The comment period started in December 2021 and continued to the end of January 2022, and at that point the City extended the comment period to March 2, 2022. Further the City conducted extended engagements in the Georgetown and South Park communities until mid-April 2022. See Section 4.2.8 .
123-2	Georgetown is unique in a sea of IG zoning. Strategy promotes new economic opportunities but other companies, public and private, are no longer requiring degrees. Assumptions are outdated, and approach misguided.	The comment is noted and forwarded to City decision makers.
123-3	The focus of the entire EIS process was on economic impacts and opportunities. Urban Industrial (UI) zone was described as an innovative approach as a “safe and comfortable design”. Question: why isn’t safety and comfortable designed into ALL zones?	The EIS does not focus on economic impacts; see Section 4.2.1 . The EIS addresses 14 environmental elements addressing the natural and built environment. It identifies mitigation measures to address environmental impacts (e.g., air quality, noise, light and glare, open space/recreation, land use, housing, etc.). The action alternatives propose three new zones that are meant to improve the quality of development. The Preferred Alternative advances the conceptual code elements. See EIS Appendix G . The EIS mitigation measures can be applied across the zones, and the City can integrate them into policies and standards. See Section 4.2.7 and Appendix J .
123-4	What problems are being solved. One of the most pressing needs of Seattle is housing. Let’s look at how industry AND mixed use AND residential can co-exist. The importance of livability should be applicable to everyone.	See response to comment 102-1.
123-5	Supports the Georgetown Community Council’s comment letter.	Comment is noted. See responses to letter 96.
124	Nyland, Kelsey	Individual
124-1	Supports the Georgetown Community Council’s comment letter.	Thank you for your letter. The comment is noted and forwarded to City decision makers. See responses to letter 96.
125	Rajcich	Individual
125-1	Supports the Georgetown Community Council’s comment letter and requests process be folded into the Comprehensive Plan update.	Thank you for your letter. The comment is noted and forwarded to City decision makers. See responses to letter 96.
126	Rivera	Individual

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Number	Comment Summary	Response
126-1	Supports the Georgetown Community Council's comment letter.	Thank you for your letter. The comment is noted. See responses to letter 96.
127	Ryan	Individual
127-1	Do not make zoning changes for Georgetown and South Park areas based on the industrial and maritime strategy process, and instead address the areas through the Comprehensive Plan update process.	Thank you for your letter. See Section 4.2.9 regarding the Strategy review and the Comprehensive Plan.
127-2	Concern that the alternatives studied threaten affordable arts and performance spaces.	Comment noted. See Section 4.2.5 concerning arts / cultural resources in Georgetown.
127-3	Concern that the alternatives would reduce or eliminate potential affordable housing.	The comments are noted. Action Alternatives expand housing allowances in currently industrially-zoned areas compared to the No Action Alternative. In Georgetown and South Park several areas are removed from industrially zoning and placed into a mixed use zone that would allow dense housing development in alternatives 3, 4 and the Preferred Alternative. The EIS discusses options for requiring that a portion of the housing be dedicated affordable housing. Section 3.9 Housing discusses impacts of alternatives on housing and displacement.
127-4	Concern that the Industrial and Maritime Strategy process did not adequately include engagement of Georgetown and South Park residential community members.	Comment is noted. See Section 4.2.8 concerning community engagement.
127-5	Concern that the proposed action prioritizes industrial and maritime uses over creative and cultural businesses.	The comment is noted. Multiple alternatives would change zoning in a portion of Georgetown from an industrial zone to a non-industrial zone. Additionally, the proposed UI designation would be intended to support small businesses, makers, and arts. Some aspects of the proposal intentionally support future viability of industrial and maritime uses in the regionally-designated MICs.
127-6	Study impacts on arts and creative communities.	The comment is noted. See Section 4.2.5 concerning arts / cultural resources in Georgetown.
127-7	Increase zoned buffer areas and decrease the amount of MML zoning.	The comment is noted. See Section 4.2.6 concerning buffer areas and reduction of MML zones in Georgetown.
127-8	Prioritize new affordable housing options.	The comment is noted. See response to 127-3.
127-9	Update zoning to reflect existing mixed uses and decrease the amount of MML zoning.	The comment is noted. See Section 4.2.6 concerning buffer areas and reduction of MML zones in Georgetown. Section 3.8 Land & Shoreline Use includes an analysis of existing land use.
127-10	Study expansion of buffer zoning such as more Commercial zoning and more mixed use zoned areas.	The comment is noted. See Section 4.2.6 concerning buffer areas and reduction of MML zones in Georgetown.
127-11	Enact changes that allow for more housing and more investment in maker and studio spaces.	The comment is noted. See response to comments 127-2 and 127-3.
127-12	Accompany the Final EIS with legislation committing the City to fund mitigation measures.	The comment is noted. See Section 4.2.7 concerning mitigation measures.
127-13	Add policy commitments to historic preservation and affordable housing for Georgetown and South Park.	The comment is noted. See response to frequent comments concerning mitigation measures.

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Number	Comment Summary	Response
127-14	Conduct more community engagement.	The comment is noted. See Section 4.2.8 concerning community engagement.
127-15	Extend the EIS process for a year.	The comment is noted. See Section 4.2.8 concerning community engagement.
127-16	Shift the process into the Comprehensive Plan major update.	The comment is noted. See Section 4.2.9 concerning coordination with the Comprehensive Plan major update.
128	Schiffer	Individual
128-1	Supports the Georgetown Community Council's comment letter.	Thank you for your letter. The comment is noted and forwarded to City decision makers. See responses to letter 96.
129	Smith	Individual
129-1	Supports the Georgetown Community Council's comment letter. Need more residential and commercial development and insulation from Industrial.	Thank you for your letter. The comment is noted. See responses to letter 96.
130	St John	Individual
130-1	Shared personal experience being impacted by noise and dangerous roads.	Comments noted. Thank you for sharing. The EIS reviews impacts of the proposed alternatives on numerous elements of the environment including noise and roadway safety.
130-2	Concern that the alternatives do not include enough conversion to UI zones or other mixed use zones that allow residential.	Comment noted. See Section 4.2.6 concerning buffer areas and conversion of more MML zoned land in and around Georgetown. See also Section 4.2.5 regarding Mixed Use in Georgetown.
130-3	Supports conversion of the Georgetown triangle area to a mixed use zone. The railroad spur in it should be removed.	Comments noted. See Section 4.2.5 regarding Mixed Use in Georgetown.
131	Sweet	Individual
131-1	Many artists located in Georgetown because they were displaced from other areas.	Thank you for your letter. The comment is noted and forwarded to City decision makers.
131-2	Impacts on arts and cultural resources should be studied more. Mitigation measures should be described in more detail.	The comment is noted. See Section 4.2.5 concerning arts / cultural resources in Georgetown.
131-3	Proposals favor growth of industrial and maritime uses over existing creative industries.	The comment is noted. Multiple alternatives would change zoning in a portion of Georgetown from an industrial zone to a non-industrial zone. Additionally, the proposed UI designation would be intended to support small businesses, makers, and arts. Some aspects of the proposal intentionally support future viability of industrial and maritime uses in the regionally-designated MICs.
131-4	Existing communities, including artists, their workspaces and businesses, and the cultural life of Seattle, are threatened.	Comments noted. See Section 4.2.5 concerning arts / cultural resources in Georgetown.
131-5	Concerned that the EIS discloses that historical and cultural resources could be damaged or altered under any alternative.	The comment is noted. Alternatives include a No Action Alternative. See Section 4.2.5 concerning arts / cultural resources in Georgetown.
131-6	The environmental impact analysis is narrow and does not fully address core principles related to environmental justice and a fair community-driven process	The comment is noted. See Section 4.2.8 regarding community engagement, and Section 1.7.15 regarding equity and environmental justice.

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Number	Comment Summary	Response
131-7	Concerns about process.	The comment is noted. A purpose of the EIS is to disclose potential impacts before any decisions are made.
131-8	Paraphrases text from the Draft EIS.	The comment is noted.
132	Terrenzio	Individual
132-1	Reject all the alternatives. Georgetown has a valuable and growing arts community and a need for affordable housing.	Thank you for your letter. The comment is noted. See Sections 4.2.5 and 4.2.10 .
133	Tilley	Individual
133-1	Supports the Georgetown Community Council's comment letter and requests process be folded into the Comprehensive Plan update.	Thank you for your letter. The comment is noted and forwarded to City decision makers. See responses to letter 96.
134	Veloria	Individual
134-1	Supports Coalitions letter.	Thank you for your letter. The comment is noted. See responses to letter 97.
135	White	Individual
135-1	Supports the Georgetown Community Council's comment letter.	Thank you for your letter. The comment is noted. See responses to letter 96.
136	Woo	Individual
136-1	Appreciate the opportunity to comment. Family built and operates the Georgetown Inn.	Thank you for your letter. The comment is noted and forwarded to City decision makers.
136-2	Request to extend the Mixed Use zone to include the Georgetown Inn (area between Harney St, Corson Ave, and Baily St). Would like an explanation of development standards for mixed use within the land use concept comparisons. Rezoning parts of Georgetown to mixed use offers many potential benefits but requires accompanying policies to ensure adequate historic preservation, affordability, and sustainability.	<p>Alternatives 3 and 4 and the Preferred Alternative remove the triangular area of Georgetown bounded by Corson Avenue S, Carleton Avenue S and I-5 from the MIC and place it into a mixed-use zone. The area would likely develop with a high concentration of urban mixed-use structures with ground level retail and residential above, and by the end of the study time horizon the area would likely transition to mixed-use area similar to an urban village. Please see Section 4.2.5 regarding an enlarged Mixed Use area in Georgetown.</p> <p>Additional detail regarding development standards to address the unique conditions in the proposed mixed use zoning in Georgetown are included under the Preferred Alternative, in the development standards Appendix G. This includes features to incentivize the retention and restoration of historic character structures and arts organization and/or arts studios. The new Mixed Use zone in the triangle area of Georgetown would be Neighborhood Commercial with a 55 foot height limit (NC3-55) and a Mandatory Housing Affordability (M1) suffix would be applied to the zone.</p>
137	Wright	Individual
137-1	Supports Coalitions letter.	Thank you for your letter. The comment is noted. See responses to letter 97.

4.3.2 Public Hearing Verbal Comments & Responses

Exhibit 4.3-2 Public Hearing Verbal Comments and Responses

Number	Comment Summary	Response
H1 Curtis, Josh		
Washington State Ballpark Public Facilities District		
H1-1	Appreciate the opportunity to provide comment and request an extension.	Thank you for your comment. The comment period was extended and more engagement opportunities were provided. Please see Section 4.2.8 .
H1-2	The stadium district is unique. Almost no industry is left in the area, but it is largely zoned industrial commercial. Most new development are offices because of the high price of land—the analysis should consider the transportation impact of a full office build out around the stadiums under the No Action Alternative.	The land use of each alternative is compared in the EIS and included in transportation modeling. Results on transportation networks inside and outside the STAOD are addressed at a non-project level of detail.
H2 Marchione, John		
Washington State Public Stadium Authority		
H2-1	EIS doesn't make clear how additional housing around the stadiums is out of character with what already exists here. Would like the Final EIS to separate the analysis of the stadium district and analyze the impacts to land use, transportation, and housing in particular.	The Preferred Alternative includes expanded flexibilities to address unique conditions of the stadium area through the STAOD. More information on these flexibilities is provided in the development standards Appendix G . The STAOD is part of the evaluation of the MIC in transportation, housing, and land use. This EIS provides a non-project level of detail that is areawide, consistent with WAC 197-11-442. Alternatives' effects on transportation corridors in and near the STAOD are included; and the area is referenced in the land use evaluation and included on maps. The STAOD boundaries are added to the Preferred Alternative map to assist in viewing that portion of the study area.
H2-2	Concerned about antiquated restrictions on housing for land zoned industrial.	Consistent with the PSRC criteria for designating MICs to focus industrial uses in the MIC, the EIS does not study allowing residential uses in the majority of the study area. Alternatives 3 and 4 and the Preferred Alternative consider limited additional flexibility of existing allowances for caretakers' units and artist/studio quarters in the proposed UI zone only.
H3 Scott		
Individual		
H3-1	Did the City consider how other cities are addressing industrial lands (such as Tacoma, Vancouver, or Baltimore)?	The City reviewed other peer cities' initiatives related to industrial lands as part of background research and analysis for the proposed action.
H4 Williams Jr., Dennis		
Individual		
H4-1	Supports Alternative 4 and an increase in the maximum size of use for indoor sports and recreation uses.	Thank you for your comment. The comment is noted and forwarded to City decision makers. Alternative 4 and the Preferred Alternative incorporate an increase in the maximum size of use for indoor sports and recreation uses.
H5 Loe, Laura		
Share The Cities Action Fund		
H5-1	Organization and comments are focused on Ballard and Interbay industrial lands.	Comment is noted.

Ch.4 Comments & Responses ■ Individual Responses to Comments

Number	Comment Summary	Response
H5-2	Supports Alternative 4, especially strengthened protections on industrials lands and the flexibility for industry supportive housing. Would like to see protections to ensure the housing is used as caretakers' quarters.	Comment is noted and forwarded to City decision makers.
H5-3	EIS should include more historical context of how redlining has aligned with Seattle's industrial lands and how growth patterns are rooted in past racial injustice.	See response to comment 59-7.
H5-4	Analysis should include more industrial areas within Seattle, such as at Madison or near light rail in North Seattle.	The community will have additional opportunities to provide input on the City's overall growth strategy as part of the Comprehensive Plan major update. The City considers the Industrial and Maritime Strategy to be a distinct subject area worthy of a topic-specific study and land use policy proposals because there are unique attributes and issues related to industrial lands and designated Manufacturing and Industrial Centers. See also Section 4.2.9 .
H5-5	Concerned about where the future vehicle traffic estimates come from.	Fehr & Peers applied a version of the PSRC regional trip-based travel demand model developed for the WSBLE project and the Ballard-Interbay Regional Transportation (BIRT) System project to develop the future forecasts for this project. The model estimates the demand for person and freight travel across a range of travel modes: private automobiles, trucks, transit vehicles, walking, and biking. The truck model defines a truck based on relative weight classes and separates medium and heavy trucks based on the definitions used by WSDOT for collecting truck counts. This version of the PSRC model is an appropriate tool for this project given its level of detail in the study area (in terms of both land uses and transportation network), assumptions for transit investments, and future land use assumptions that are consistent with growth anticipated through 2042. The model contains household and employment forecasts consistent with regional assumptions from PSRC and the City's MHA growth distributions. See also the analysis methodology in Section 3.10.2 .
H5-6	Want to see more analysis by zone.	Chapter 2 of the EIS describes the alternatives, including the overall intent and themes for each. A Preferred Alternative is added in the Final EIS. All Action Alternatives are different variations of application of the UI, II, and MML zones. General locational criteria and intent is described for each of the three proposed new zones in Chapter 2 . Appendix C includes detailed maps depicting alternate zone changes with specific boundaries. A story map is also provided by the City which allows detailed review to a parcel-specific level. See the storymap link here .
H5-7	Concerned about the jobs to housing balance and housing crunch for middle wage workers (which impacts middle and low wage workers and can lead to homelessness issues). Want to make sure the middle wage jobs are on the higher end of middle wage.	The comment is noted and forwarded to City decision makers. The City conducted research and analysis to project the type of jobs expected, including review of typical wages in different jobs. The analysis was conducted in parallel with the EIS and growth estimations in the proposal are based on the prior analysis.
H5-8	Happy with the Draft EIS and excited to see what folks in other parts of Seattle have to say.	Thank you for your comment. Comment is noted.

Number	Comment Summary	Response
H5-9	Make sure the future land uses and roads etc. are friendly for pedestrians.	SDOT is currently in the process of developing the Seattle Transportation Plan which will integrate the City's modal plans into a comprehensive vision for the citywide transportation network centered around the following values and goals: equity, safety, mobility, sustainability, livability, and excellence.
H6	Scott	Individual
H6-1	Strongly support Alternative 4.	Comment is noted and forwarded to City decision makers.
H6-2	Should be greater focus on general public benefit, such as better public access, ground level landscaping/green space, and sustainability (site and building features). Could offer height or density bonuses in exchange.	The UI zone would have higher standards for landscaping and tree planting with new development than the zone it would replace under the alternatives. The City's Parks, Recreation and Open Space Plan outlines the City's existing open space and recreational facilities, capital funding, and projects being funded and a vision for the future.
H6-3	Flexibility and affordability for artists and live/work opportunities, especially around light rail stations. New buildings on Salmon Bay have luxury caretaker units which doesn't seem equitable.	Comment is noted and forwarded to City decision makers. Alternatives 3 and 4 and the Preferred Alternative consider limited additional flexibility of existing allowances for caretakers' units and artist/studio quarters in the proposed UI zone only. The II zone, applied in alternatives 3 and 4 and the Preferred Alternative, would allow mixed use with industrial, technology, and office in proximity to light rail. See also Section 4.2.10 .
H6-4	Stadium area should be an urban entertainment and arts district. Heavy traffic during games has a major impact on industrial.	The Preferred Alternative includes expanded flexibilities to address unique conditions of the stadium area through the STAOD. More information on these flexibilities is provided in the development standards Appendix G . The STAOD is part of the transportation evaluation (see Section 3.10 Transportation), including the effects of each alternative on transportation corridors in and near the STAOD.
H6-5	Little to no investment to date near the stadiums or SODO light rail stations. Encourage affordable housing and small business opportunities near light rail stations (like in alternatives 3 and 4). Zone near light rail stations should have minimum residential height of 65 or 85 feet.	The II zone, applied in alternatives 3 and 4 and the Preferred Alternative, would allow for a significant amount of non-industrial uses—including technology and office—through a development bonus system. The II zone would be applied under multiple alternatives to the area around the SODO/Lander St. station in the SODO area.
H6-6	Important to consider the areas of underutilized or vacant industrial land.	Comment is noted and forward to City decision makers. Section 3.8 Land & Shoreline Use includes an analysis of existing land use, including narrative descriptions of subarea land use patterns under existing conditions.

4.4 Marked Comment Letters & Public Hearing Transcripts

The marked letters, online survey forms, and public hearing transcripts are available on the City's project webpage: [Industrial and Maritime Strategy—OPCD | seattle.gov](#).