Section 3.8

Land & Shoreline Use

This section summarizes the affected environment—including the historical context of planning and land use decisions, current land use plan and policy framework, and current land and shoreline uses in the study area—and compares impacts of the alternatives on land and shoreline use in the study area.

Four impact categories were used to identify potential adverse land use impacts in the study area and at a subarea level (where applicable): consistency with plans and policies, land use compatibility, employment mix, and land use transitions. The alternatives are expected to result in a land use impact if:

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

Land use impacts of the alternatives are considered significant if:

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

Within industrial areas that have limited residential populations and a utilitarian industrial context, impacts related to height, bulk, and scale, and aesthetics are not considered adverse impacts. Other areas of the city, outside of MICs or industrial zones are more sensitive to aesthetic and height/bulk/scale impacts. Therefore, within this EIS adverse impacts related to aesthetics and height/bulk/scale are focused on the transition areas and addressed as part of the land use transitions impacts analysis.

Mitigation measures and a summary of any significant unavoidable adverse impacts are included following the impacts analysis.

3.8.1 Affected Environment

Overview of Historical Planning & Land Use Decisions

Prior to the presence of White settlers in the region the study area was inhabited extensively by Coast Salish peoples for thousands of years. Before European contact, the region was one of the most populated centers in North America. The Indians of the Eastern Puget Sound lived in relatively small, autonomous villages and spoke variations of the Lushootseed (*txʷəlšucid*, *dxʷləšúcid*), one of the Coast Salish languages. Many tribes were affiliated through intermarriage, political agreement, trade, and material culture. Indigenous people lived in permanent villages of longhouses or winter houses, and traditionally left their winter residences in the spring, summer, and early fall in family canoes to travel to temporary camps at fishing, hunting, and gathering grounds. At the time of the first White settlements around 1850, natives were living in more than 90 longhouses, in at least 17 villages, in modern-day Seattle and environs including in the study area. See also **Section 3.11 Historic, Archaeological, & Cultural Resources**.

Waterways were central to the cultures and livelihoods of native people. Duwamish "Duwamish" is the Anglo-Europeanized word which meant "people of the inside", *dxʷdəwʔabš*, referencing the interior waters of the Duwamish, Black and Cedar rivers. The Suquamish take their name from the Lushootseed phrase for “people of the clear salt water”, and the people living around Lake Washington were collectively known as *hah-choo-AHBSH* or *hah-chu-AHBSH* or *Xacuabš*, People of *HAH-choo* or *Xachu*, "People of a Large Lake" or "Lake People".

Physical alteration of the land and waterways by white settlers is important context for a discussion of land use today. Most present-day manufacturing and industrial centers are along the Duwamish River’s historic meandering flood plain, Elliott Bay, Lake Union, and Salmon Bay. Prior to the Lake Washington ship canal and other alterations, the land and waterways looked much different. In the location of present-day Lake Union there were a series of separate lakes that natives transited with over-land portages. The Lushootseed name for present day Lake Union was *tenas Chuck* or *XáXu7cHoo* ("small great-amount-of-water"), present day Lake Washington was called *hyas Chuck* or *Xacuabš* ("great-amount-of-water"), and the present-day area of the Montlake Cut was called "Carry a Canoe".

Construction of a system of locks and cut waterways connecting east to west began in 1911 and culminated in 1916 (see **Exhibit 3.8-1**). Waters were connected from Lake Washington’s Union Bay to Lake Union, to Salmon Bay though a series of locks to Shilshole Bay. As a result, the waters of Lake Washington were partially drained, lowering the level of that lake by 8.8 ft and drying up more than 1,000 acres of wetlands.

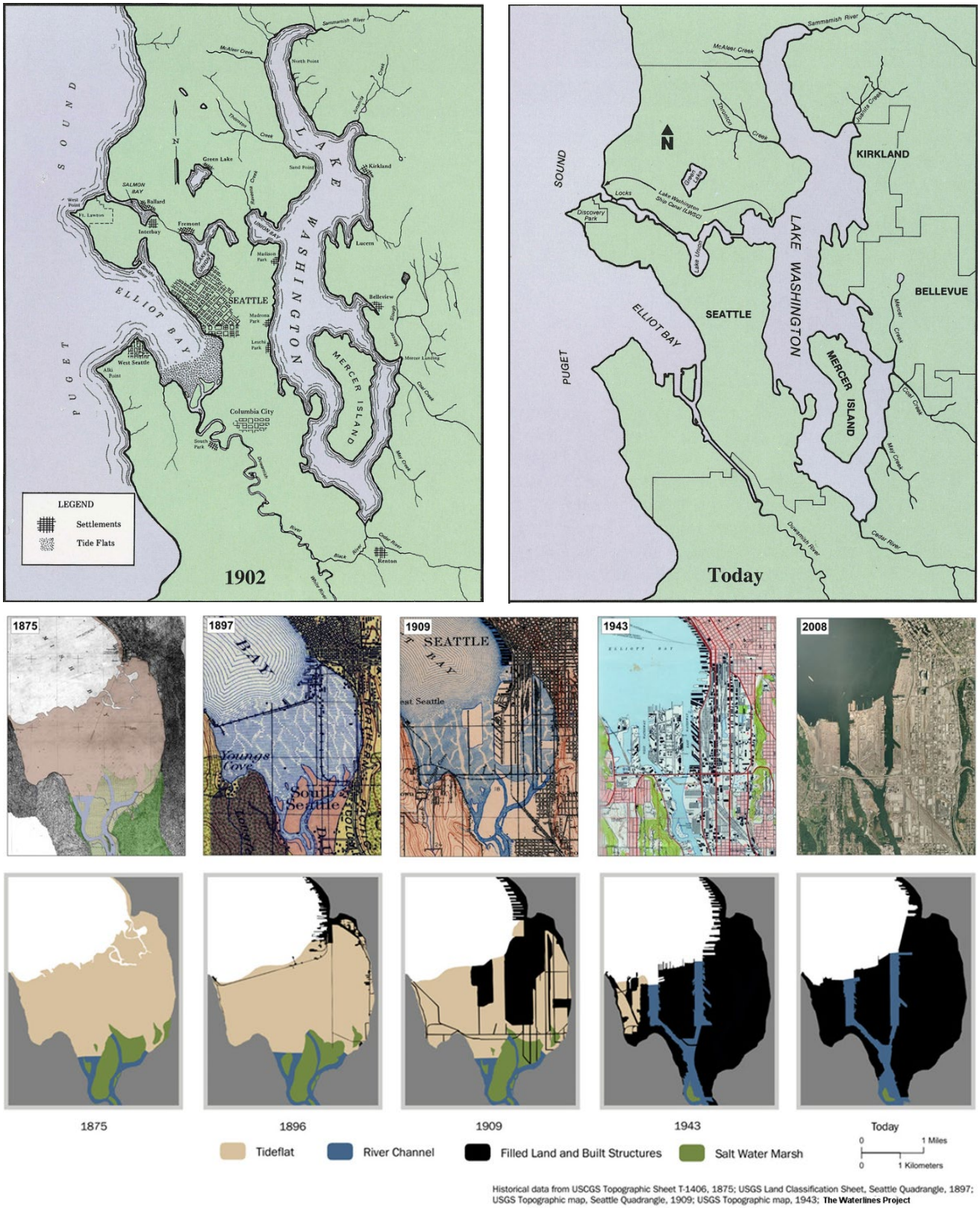
Changes to river flows at the south end of Lake Washington resulted from construction of the ship canal and locks. Prior to the alterations, Lake Washington emptied from its south end into the Black River (which no longer exists). The Black River connected to the Duwamish River, which outlets as it does today to Elliott Bay. The Cedar River, which had previously flowed into

the Black River in Renton, was diverted in 1912 directly into the south end of Lake Washington to reduce flooding in Renton. In 1916, when Lake Washington's level dropped, the remaining portion of the Black River dried up. Several indigenous villages were located near the confluence of the Black and Duwamish rivers and the area was long used as a place of refuge. When the Black River vanished, natives were displaced from the area.

During the first decades of the 20th century hundreds of acres of tide flats were also filled in to create dry land as depicted below in **Exhibit 3.8-1**. After the completion of the man-made Harbor Island in 1909, the mouth of the Duwamish River was divided into two channels. A series of major public works projects were undertaken to straighten and dredge the Duwamish riverbed, both to open the area to commercial use and to alleviate flooding. The City of Seattle formed the Duwamish Waterway Commission in order to oversee the re-channeling of the river and beginning in 1913 the river was altered to remove oxbows and meanders to maintain high water flows and turning ships. By 1920, 4½ miles of the Duwamish Waterway had been dredged to a depth of 50 feet, with 20 million cubic feet of mud and sand going into the expansion of Harbor Island. The shallow, meandering, nine-mile-long river became a five-mile engineered waterway capable of handling ocean-going vessels. The Duwamish basin became Seattle's industrial and commercial core area. Activities included cargo handling and storage, marine construction, ship and boat manufacturing, concrete manufacturing, paper and metals fabrication, food processing, and many other industrial operations. Boeing Plant 1 was established on the Lower Duwamish in 1916, and Boeing Plant 2 further upriver in 1936. Through the 1930's and 1940's Boeing's operations and footprint expanded greatly to support United States war efforts.

Native villages on the Duwamish were completely supplanted by white settlement and commercial use through the massive alterations of the land and waterways, the destruction of wildlife and fish habitats it caused, by the occupation of land. There was also deliberate removal of native settlements evidenced by burning of Indian longhouses in 1893. Duwamish people continued to work and fish in the area, using man-made "Ballast Island" on the Seattle waterfront as a canoe haul-out and informal market, but by the mid-1920's, most remnants of traditional life along the river had disappeared.

Exhibit 3.8-1 Seattle's Shoreline Over Time



Source: Burke Museum, The Waterlines Project.

With the spread of ecological concerns in the 1970s, various environmental, tribal, and community organizations became interested in the severely polluted Duwamish. Kellogg Island, the last remnant of the original river, was declared a wildlife preserve, and nearby terminal T-107 was converted into a park, creating a substantial natural area near the mouth of the river. T-107 is the site of the Duwamish village of x̌aʔəpus. Intervention by Native people was instrumental in the reclamation of T-107 and Kellogg Island as natural areas that remain hotspots of biodiversity instead of additional industrial uses along the river.

In 2009, the Duwamish Longhouse and Cultural Center was opened on the west bank of the river. The Duwamish Longhouse, Herring's House Park, Kellogg Island have an important presence in the study area today as vestige of connection to the natural state of the river and of ownership and residence by the native Duwamish people.

Due to 20th century industrial contamination, the lower 5 miles of the Duwamish was declared a superfund site by the United State Environmental Protection Agency. Cleanup and restoration efforts are ongoing. The Duwamish River Community Coalition (DRCC) was established in 2001 to help monitor cleanup of the river. DRCC promotes place-keeping and prioritizes community capacity and resilience and is actively promoting improvements and investments in the greater Duwamish Valley that will benefit communities there.

The steady expansion of industrial and commercial enterprises on land in the study area led to some displacement of some non-native settlements. This history is evident in areas including Georgetown, South Park, and portions of northeast Ballard.

Due to dredging and rerouting of the Duwamish River, parts of the Georgetown and South Park neighborhoods once on riverbanks found themselves inland. Georgetown had early rail connections at the location of the present-day Union Pacific Argo Yard and operated as its own small city from 1904 to 1910 before being annexed by Seattle. Industrial and commercial activity expanded in the first decades of the 20th century with establishment of the public airport south of Georgetown (present day King County Airport), expansion of Boeing's aircraft assembly plants in the 1930's and 1940's and varied industrial and warehouse businesses on filled tidelands accessed by rail spurs. Residential elements declined in Georgetown by the 1950's and civic features such as a public library branch and movie theatre were shuttered. Evidence of isolation of former residential uses can be seen in the vicinity today where residential structures over 75 years old remain within a broader industrial context.

South Park, on the west bank of the Duwamish was similarly affected by the historical expansion of industry. In the late 1800s and early 1900s, South Park was largely a farming community. Italian and Japanese families farmed the alluvial plain of the Duwamish and brought goods for sale in Seattle at Pike Place Market. During the War era, South Park's residential population increased as a place for workers. However, in the late 1950s and 1960s Seattle sought to expand industrial zoning throughout South Park. Protests by residents resulted in most of present-day South Park retaining residential zoning and a residential presence.

Historical land use decisions also led to the location of multi-family housing in areas bordering industrial lands that caused environmental justice harms. Seattle's first zoning ordinance in 1923 and its major update in 1956 located multi-family residential districts at the edges of rail lines, industrial districts, and manufacturing districts. Relatively less affluent renters were exposed to noise and air quality and other impacts, while single family districts removed from the edges of industrial areas were not. The continued pattern of multi-family housing and zoning districts bordering MICs continues to be evident today in areas including Interbay and the northeast edge of Ballard.

Data and Methods

The Land Use Section uses an inventory of existing land uses based on parcel level GIS data that was updated with manual scans by City staff and consultants and input from stakeholders. Existing and projected employment information relies on a 2021 CAI Inc. study. In addition to data, state, regional and local land use policies were reviewed and evaluated.

Current Policy & Regulatory Framework

Identification of land use impacts requires consideration of the policy framework regulating land use in Seattle's industrial areas. The policy framework flows from the State of Washington Growth Management Act, the Puget Sound Regional Council's (PSRC's) Multi-County Planning Policies (MPPs), King County's County-Wide Panning Policies (CPPs) the City Comprehensive Plan (Seattle 2035), and implementation actions including development standards in the Seattle Municipal Code (SMC) and the City's Shoreline Master Program. Several other regulatory measures affect industrial land use including localized overlay districts and community agreements.

State & Regional Policy Framework

Growth Management Act

The Washington State Growth Management Act (GMA), adopted in 1990, is a body of planning regulations that establishes requirements for Counties and localities to plan for future growth.

- GMA requires local governments to manage growth by (among other things) preparing comprehensive plans and implementing them through capital investments and development regulations (zoning).
- The Washington State Department of Commerce, the Puget Sound Regional Council, and a Governor-appointed Hearings Board oversees whether local governments are in compliance.
- Local comprehensive plans must provide land use capacity to accommodate growth that is projected for 20 years.

- Cities in King County must demonstrate sufficient zoned capacity for housing and employment growth.

Consistent with the GMA, the City of Seattle prepares updates to its Comprehensive Plan to accommodate new 20-year growth projections every eight years and has an annual process to amend the plan between major updates. Seattle most recently completed a major update, Seattle 2035, in 2015 and is preparing for a major update in 2024 that will extend the planning horizon to the year 2044.

The GMA establishes planning requirements and procedures including mandating elements of the Comprehensive Plan that the City must address (discussed below)

Puget Sound Regional Council VISION 2050

The Puget Sound Regional Council (PSRC) is composed of nearly 100 members, including the four counties, cities and towns, ports, state and local transportation agencies, and Tribal governments within the region. PSRC develops policies and coordinates decisions about regional growth, transportation and economic development planning within King, Pierce, Snohomish, and Kitsap counties.

The GMA requires multi-county planning policies (MPPs) and cities and counties planning under GMA must develop Comprehensive Plan policies consistent with the MPPs. MPPs for King, Pierce, Snohomish, and Kitsap are adopted by PSRC in a long-range plan called VISION 2050, the region's plan for growth. By 2050, the region's population is expected to reach 5.8 million people.

PSRC designates MICs for the Puget Sound Region. VISION 2050 establishes criteria for designation of MICs. MICs are primarily locations of more intense industrial uses and employment and are not appropriate for housing. VISION 2050 calls for the recognition and preservation of existing centers of intensive manufacturing and industrial activity and the provision of infrastructure and services necessary to support these areas. VISION 2050 discourages non-supportive land uses in MICs, such as large retail stores or non-related offices.

The Regional Centers Framework adopted by PSRC in 2018 lays out criteria for designation of MICs that address size, current and future employment, and mix of uses, the majority of which are expected to represent core industrial activities. Cities are expected to plan for each MIC through a subarea planning process or the equivalent. There are 10 total designated MICs in the four-county region, two of which are in Seattle: the Greater Duwamish MIC and the Ballard Interbay Northend MIC (BINMIC).

The criteria established by PSRC for designation or redesignation as a MIC are the following:

- Planned jobs: 20,000 minimum.
- Minimum 50% industrial employment.
- If MIC is within a transit service district, availability of existing or planned frequent, local, express, or flexible transit service. If MIC is outside a transit service district, documented

strategies to reduce commute impacts through transportation demand management strategies consistent with the Regional Transportation Plan Appendix F (Regional TDM Action Plan).

- Presence of irreplaceable industrial infrastructure.
- At least 75% of land area zoned for core industrial uses.
- Industrial retention strategies in place.
- Regional role.

MIC designation is important not only for the regional recognition of the value of the City's industrial areas to the State, but it also makes these areas eligible for federal transportation funding.

Local Policy Framework

King County

Within the GMA framework, each county collaborates with its cities to adopt Countywide Planning Policies (CPPs) and develop local growth targets that set expectations for local comprehensive plans. The MICs are also designated at this countywide level. In July of 2021 the GMPC approved new CPPs, and they are now being considered by the King County Council. The updated policies are consistent with PSRC's newly adopted VISION 2050. It is anticipated that these policies will be adopted prior to issuance of a Final Industrial and Maritime Strategy EIS. The CPPs include two policies for MICs. These policies are as follows:

> ***DP-38*** *Designate and accommodate industrial employment growth in a network of regional and countywide industrial centers to support economic development and middle-wage jobs in King County. The Generalized Land Use Categories Map in Appendix 1 shows the locations of the designated Manufacturing/Industrial Centers. Designate these centers based on nominations from cities and after determining that:*
>
> *a) the nominated locations meet the criteria set forth in the King County Centers Designation Framework and the criteria established by the Puget Sound Regional Council for regional manufacturing/ Industrial Centers;*
>
> *b) the proposed center's location will promote a countywide system of manufacturing/industrial centers with the total number of centers representing a realistic growth strategy for the county; and*
>
> *c) the city's commitments will help ensure the success of the center.*
>
> ***DP-38*** *Minimize or mitigate potential health impacts of the activities in manufacturing/industrial centers on residential communities, schools, open space, and other public facilities.*

City of Seattle 2035 Comprehensive Plan

Seattle's Comprehensive Plan establishes land use policies for industrial areas in Seattle. The Plan, subject to approval by PSRC for consistency with VISION 2050 and the CPP's, above, sets out Seattle's growth management strategy. Seattle 2035 includes a land use element, container port element, and shoreline areas element that each establish land use goals and policies for Seattle's industrial areas. Other elements that guide the City's investments and activities in industrial lands include the transportation, economic development, and environment elements.

This proposal includes amendments to the existing goals and policies in the land use element that will include a framework for the new proposed industrial zones that are analyzed in the three Action Alternatives, an amendment to strengthen existing protections for industrial land by limiting changes to MIC boundaries to major updates of the Comprehensive Plan, and an amendment that states the intent of the City to work with the owners of the Oregon Washington Shippers Cooperative Association (WOSCA) site and the Interbay Armory site on future master planning for future industrial redevelopment of those sites.

The land use policies, below, include both the existing policy framework and the proposed amendments to the Comprehensive Plan that are a part of this proposal. The proposed amendments are indicated with underlined, and deletions are in ~~strikethrough~~.

Land Use Element

Goals

> ***LU G10*** *Provide sufficient land with the necessary characteristics to allow industrial activity to thrive in Seattle and protect the preferred industrial function of these areas from activities that could disrupt or displace them.*
>
> ***LU G11*** *Support employment-dense emerging industries that require greater flexibility in the range of on-site uses and activities.*
>
> ***LU G12*** *Develop transitions between industrial areas and adjacent neighborhoods that support healthy communities, reduce adverse environmental impacts, and minimize land use conflicts.*

Policies

> ***LU 10.1*** *Designate industrial zones generally where*
>
> *1. the primary functions are industrial activity and industrial-related commercial functions,*
>
> *2. the basic infrastructure needed to support industrial uses already exists, areas are large enough to allow a full range of industrial activities to function successfully, and*
>
> *3. sufficient separation or special conditions exist to reduce the possibility of conflicts with development in adjacent less intensive areas.*

LU 10.2 *Preserve industrial land for industrial uses, especially where industrial land is near rail- or water-transportation facilities, in order to allow marine- and rail-related industries that rely on that transportation infrastructure to continue to function in the city.*

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

LU 10.~~3~~4 *Accommodate the expansion of current industrial businesses and promote opportunities for new industrial businesses and emerging industries within Seattle to strengthen the city's ~~existing~~ industrial economy.*

LU 10.4~~5~~ *Restrict to appropriate locations within industrial areas those activities that—by the nature of materials involved or processes employed—are potentially dangerous or very noxious.*

LU 10.5~~6~~ *Provide a range of industrial zones that address varying conditions and priorities in different industrial areas. Those priorities include maintaining industrial areas that have critical supporting infrastructure, leveraging investments in high-capacity transit service, providing transitions between industrial areas and less intensive areas, and promoting high-quality environments attractive to business expansion or to new industrial activities.*

LU 10.7 *Use the following zones for industrial lands in Seattle:*

- *Maritime, Manufacturing and Logistics: This designation would be intended to support the city's maritime, manufacturing, logistics and other industrial clusters. Areas that have significant industrial activity, accessibility to major industrial infrastructure investments, or locational needs (Port facilities, shipyards, freight rail, and shoreline access) may be considered for the maritime, manufacturing, and logistics designation.*
- *Industry and Innovation: This designation would be intended to promote emerging industries and leverage investments in high-capacity transit. These industrial transit-oriented districts may be characterized by emerging industries and high-density industrial employment that combine a greater mix of production, research and design, and offices uses found in multi-story buildings. Areas in MICs and are generally within one quarter and one-half mile of high-capacity transit stations may be considered for the industry and innovation designation.*
- *Urban Industrial: This designation would be intended to encourage a vibrant mix of uses and relatively affordable, small-scale industrial, makers and arts spaces. Areas located at transitions from industrial to commercial and residential areas traditionally zoned for buffer purposes may be considered for the Urban industrial designation.*

LU 10.~~6~~8 *Prohibit new residential development in industrial zones, except for certain types of dwellings, such as caretaker units or, potentially in urban industrial zones, dwellings for workers that are related to the industrial area and that would not restrict or disrupt industrial activity.*

LU 10.~~7~~9 *Use the general industrial or maritime, manufacturing, and logistics zones to promote a full range of industrial activities and related support uses.*

LU 10.~~8~~10 *Apply the general industrial zones mostly within the designated manufacturing/industrial centers, where impacts from industrial activity are less likely to affect residential or commercial uses. Outside of manufacturing/industrial centers, general industrial or the maritime, manufacturing, and logistics zones may be appropriate along waterways used for maritime uses. Consider applying the maritime, manufacturing, and logistics designation mostly within the designated manufacturing/industrial centers and it may also be appropriate outside of manufacturing/industrial centers along waterways used for maritime uses.*

LU 10.~~9~~11 *Avoid placing industrial zones within urban centers or urban villages. However, in locations where a center or village borders a manufacturing/industrial center, use of the industrial commercial-within the center or village where it abuts the manufacturing/industrial center may provide an appropriate transition to help separate residential uses from heavier industrial activities. Consider using the urban industrial zone in locations where a center or village borders a manufacturing/industrial center, where it abuts the manufacturing/industrial center may provide an appropriate transition to help separate residential uses from heavier industrial activities.*

LU 10.~~10~~12 *Limit the density of development for nonindustrial uses in the manufacturing/industrial centers to reduce competition from nonindustrial activities that are better suited to other locations in the city, particularly urban centers and urban villages, where this Plan encourages most new residential and commercial development. Permit a limited amount of stand-alone commercial uses in industrial areas as workforce amenities. ~~or only if they reinforce the industrial character, and~~ strictly limit the size of office and retail uses not associated with industrial uses~~,~~ in order to preserve these areas for industrial development.*

LU 10.~~11~~13 *Recognize the unique working character of industrial areas by keeping landscaping and street standards to a minimum to allow flexibility for industrial activities, except along selected arterials where installing street trees and providing screening and landscaping can offset impacts of new industrial development in highly visible locations.*

LU 10.~~12~~14 *Set parking and loading requirements in industrial zones to provide adequate parking and loading facilities to support business activity, promote air quality, encourage efficient use of the land in industrial areas, discourage underused parking facilities, and maintain adequate traffic safety and circulation. Allow some on-street*

loading and occasional spillover parking. Consider limiting parking in the industry and innovation zone located in the vicinity of high-capacity transit stations.

LU 10.~~13~~15 *Maintain standards for the size and location of vehicle curb cuts and driveways in industrial zones in order to balance the need to provide adequate maneuvering and loading areas with availability of on-street parking and safe pedestrian, bike, and transit access.*

LU 10.~~14~~16 *Permit noise levels in industrial areas, except buffer areas, that would not be allowed in other parts of the city, in recognition of the importance and special nature of industrial activities.*

LU 10.~~15~~17 *Classify certain industrial activities as conditional uses in industrial zones in order to accommodate these uses while making sure they are compatible with the zone's primary industrial function and to protect public safety and welfare on nearby sites. Require mitigation of impacts on industrial activity and on the immediate surroundings, especially nearby less intensive zones.*

LU 10.~~16~~18 *Prohibit uses that attract large numbers of people to the industrial area for nonindustrial purposes, in order to keep the focus on industrial activity and to minimize potential conflicts from the noise, nighttime activity, and truck movement that accompanies industrial activity. Consider allowing such uses in the urban industrial zone only.*

LU 10.19 *In the industry and innovation zone, consider development regulations that are compatible with employment-dense transit-oriented development. Seek to establish minimum density standards to ensure employment density at a level necessary to leverage transit investments. Consider upper level density limits to discourage higher value ancillary uses that are more appropriate in non-industrial areas.*

LU 10.20 *In the Industry and Innovation zone, consider development standards that promotes development that meets the needs of industrial businesses including load-bearing floors, freight elevators, and adequate freight facilities.*

LU 10.21 *In the industry and innovation zone, consider an incentive system whereby non-industrial floor area may be included in a development as a bonus if new bona-fide industrial space is included.*

LU 10.~~17~~22 *~~Establish the industrial buffer~~ Consider using the urban industrial or industrial buffer zones to provide an appropriate transition between industrial areas and adjacent residential or pedestrian-oriented commercial zones.*

LU 10.23 *In the urban industrial zone, consider allowing a range of ancillary non-industrial uses. Recognize that industrial businesses in this zone have a greater need for a limited amount of space for such uses as tasting rooms and retail facilities that directly support the industrial activity of the business.*

LU 10.24 *In the urban industrial zone, consider establishing buffer standards to ease the transition from industrial areas to urban villages and other non-industrial parts of Seattle.*

LU 10.25 *Recognize the unique development opportunity that the Washington National Guard Armory in the BINMIC represents. Work with the State of Washington or other future owners of this site to develop a comprehensive industrial development plan. This plan should include green infrastructure, consolidated waste management programs, and workforce equity commitments.*

LU 10.~~18~~26 *Allow the widest possible range of manufacturing uses and related industrial and commercial activities within the industrial buffer zone, while ensuring compatibility the activity and physical character of neighboring less intensive zones.*

LU 10.~~19~~27 *Include development standards or performance standards for the industrial buffer zone that protect the livability of neighboring areas, promote visual quality, and maintain a compatible scale of development along zone edges. Apply these standards only in places where existing conditions do not adequately separate industrial activity from less intensive zones.*

LU 10.~~20~~28 *Limit the height of structures on the borders of industrial buffer zones where streets along the zone edge do not provide sufficient separation for a reasonable transition in scale between industrial areas and less intensive neighboring zones, taking into consideration the permitted height in the abutting less intensive zone.*

LU 10.~~21~~29 *Allow a wide mix of employment activities in the industrial commercial zones, such as light manufacturing and research and development.*

LU 10.~~22~~30 *Limit development density in industrial commercial and maritime, manufacturing, and logistics zones in order to reflect transportation and other infrastructure constraints, while taking into account other features of an area.*

LU 10.~~23~~31 *Include development standards in the industrial commercial zone designed to create environments that are attractive to new technology businesses and that support a pedestrian-oriented environment, while controlling structure height and scale to limit impacts on nearby neighborhoods.*

LU 10.~~24~~32 *Provide a range of maximum building height limits in the industrial commercial zones in order to protect the distinctive features that attract new technology businesses to the area—such as views of water, shoreline access, and the neighborhood scale and character—to make sure that these features will continue to be enjoyed, both within the zone and from the surrounding area.*

LU 10.~~26~~33 *Assign height limits independently of the industrial zoning designation to provide flexibility in zoning-specific areas and to allow different areas within a zone to be assigned different height limits according to the rezone criteria.*

LU 10.~~26~~34 *Restrict or prohibit uses that may negatively affect the availability of land for industrial activity, or that conflict with the character and function of industrial areas.*

LU 10.~~27~~35 *Consider high value-added, living wage industrial activities to be a high priority.*

LU 10.~~28~~36 *Permit commercial uses in industrial areas to the extent that they reinforce the industrial character, and limit specified non-industrial uses, including office and retail development, in order to preserve these areas for industrial development.*

Container Port Element Land Use Policies (from Seattle 2035)

The container port element contains land use, transportation, economic development, and environmental policies to guide and support container port activities in Seattle. The land use policies emphasize ensuring adequate land area needs for port expansion, avoiding land use conflicts. These policies focus more specifically on the maritime industry than the land use policies, above. Container Port Element land use policies are below:

CP 1.1 *Help preserve cargo container activities by retaining industrial designations on land that supports marine and rail- related industries including industrial land adjacent to rail or water-dependent transportation facilities.*

CP 1.2 *Continue to monitor the land area needs, including for expansion, of cargo container related activities and take action to prevent the loss of needed land that can serve these activities.*

CP 1.3 *Discourage non-industrial land uses, such as stand-alone retail and residential, in industrially zoned areas to minimize conflicts between uses and to prevent conversion of industrial land in the vicinity of cargo container terminals or their support facilities.*

CP 1.4 *Consider how zoning designations may affect the definition of highest and best use, with the goal of maintaining the jobs and revenue that cargo container activities generate and to protect scarce industrial land supply for cargo container industries, such as marine and rail-related industries.*

CP 1.5 *Consider the value of transition areas at the edges of general industrial and maritime manufacturing and logistics zones which allow a wider range of uses while not creating conflicts with preferred cargo container activities and uses. In this context, zoning provisions such as locational criteria and development standards are among the tools for defining such edge areas.*

Shoreline Areas Element (from Seattle 2035)

As part of the Shoreline Master Program (discussed below), the shoreline areas element contains land use policies for industrial land adjacent to Seattle's shorelines. These policies are implemented through the Shoreline Master Program which designates which shorelines are industrial in use and establishes development regulations for those uses within 200-feet of the shoreline.

SA P37 *Support the retention and expansion of existing conforming water-dependent and water-related businesses and anticipate the creation of new water-dependent and water-related development in areas now dedicated to such use.*

SA P38 *Identify and designate appropriate land adjacent to deep water for industrial and commercial uses that require such condition.*

SA P39 *Provide regulatory and nonregulatory incentives for property owners to include public amenities and ecological enhancements on private property.*

SA P40 *Identify and designate appropriate land for water-dependent business and industrial uses as follows:*

1. *Cargo-handling facilities*
2. *Tug and barge facilities*
3. *Shipbuilding, boatbuilding, and repairs*
4. *Moorage*
5. *Recreational boating*
6. *Passenger terminals*
7. *Fishing industry*

(See Seattle 2035 for Detailed policy guidance provided for each)

SA P41 *Allow multiuse developments including uses that are not water dependent or water related where the demand for water-dependent and water-related uses is less than the land available or if the use that is not water dependent is limited in size, provides a benefit to existing water-dependent and water-related uses in the area, or is necessary for the viability of the water-dependent uses. Such multiuse development shall provide shoreline ecological restoration, which is preferred, and/or additional public access to the shoreline to achieve other Shoreline Master Program goals.*

Comprehensive Plan Growth Strategy

The Comprehensive Plan includes the city's overall plan for accommodating housing and job growth over a 20-year planning horizon. Under GMA the plan must demonstrate the City's ability to accommodate expected additional jobs and housing. The plan includes estimations for where jobs and housing will be located in the city and seeks to steer the allocation of new jobs and housing to those areas with land use regulations. During the previous 20-year planning horizon of the Seattle 2035 Comprehensive Plan, MICs were planned to accommodate 9,000 of the city's estimated total job growth of 115,000, or about 8%. The City is currently embarking on a major update to the Comprehensive Plan to the year 2044, and the total citywide estimation of job growth for the new 20-year planning horizon is 169,500 additional jobs. Growth studied in this EIS is expected to be integrated into the 2044 Comprehensive Plan major update.

MIC Subarea Plans

PSRC MIC designation also requires Centers Plans (this is a requirement for other designated Urban Centers as well). Both the Greater Duwamish MIC and the BINMIC have subarea plans that were adopted in 2000 and 1998, respectively. 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.

Ballard Interbay Northend Neighborhood Plan

Applicable goals and policies include:

> ***BI-P2*** *Preserve land in the BINMIC for industrial activities such as manufacturing, warehousing, marine uses, transportation, utilities, construction, and services to businesses.*
>
> ***BI-P8*** *Maintain the BINMIC as an industrial area and work for ways that subareas within the BINMIC can be better utilized for marine/fishing, high tech, or small manufacturing industrial activities.*
>
> ***BI-P9*** *Support efforts to locate and attract appropriately skilled workers, particularly from adjacent neighborhoods, to fill family-wage jobs in the BINMIC.*
>
> ***BI-P10*** *Support efforts to provide an educated and skilled labor workforce for BINMIC businesses.*
>
> ***BI-P11*** *Within the BINMIC, water-dependent and industrial uses shall be the highest priority use.*

Greater Duwamish MIC Neighborhood Plan

Applicable goals and policies include:

> ***GD-G3*** *Land in the Duwamish Manufacturing/ Industrial Center is maintained for industrial uses including the manufacture, assembly, storage, repair, distribution, research about or development of tangible materials and advanced technologies; as well as transportation, utilities, and commercial fishing activities.*
>
> ***GD-P5*** *Limit the location or expansion of nonindustrial uses, including publicly sponsored nonindustrial uses, in the Duwamish Manufacturing/Industrial Center.*
>
> ***GD-G8*** *The Duwamish Manufacturing/Industrial Center remains a manufacturing/industrial center promoting the growth of industrial jobs and businesses and strictly limiting incompatible commercial and residential activities.*

Seattle Municipal Code Industrial Zones (SMC 23.50)

Seattle's industrial zones were last updated in 1987 when the current Industrial 1 (IG1), Industrial General 2 (IG2), Industrial Commercial (IC) and Industrial Buffer (IB) zones were established and have only been altered slightly since then. The functional intent of the zones is as follows:

- **IG1:** An area that provides opportunities for manufacturing and industrial uses and related activity, where these activities are already established and viable, and their accessibility by rail and/or waterway make them a specialized and limited land resource.
- **IG2:** An area with existing industrial uses, that provides space for new industrial development and accommodates a broad mix of activity, including additional commercial development, when such activity improves employment opportunities and the physical conditions of the area without conflicting with industrial activity.
- **IC:** The Industrial Commercial zone is intended to promote development of businesses which incorporate a mix of industrial and commercial activities, including light manufacturing and research and development, while accommodating a wide range of other employment activities.
- **IB:** An area that provides an appropriate transition between industrial areas and adjacent residential zones, or commercial zones having a residential orientation and/or pedestrian character.

For a summary of the locational criteria and development regulations in the IG1, IG2, IC, and IB zones see **Appendix E**. Development standards include allowable uses, height limits, floor area ratio limits, and maximum size of use limits.

In 2007, the City passed Ordinance 122601 that took steps to reduce maximum size of use limits for non-industrial uses in industrial zones. It was preceded by studies that found industrial occupancy rates of industrial land to be very high and that non-industrial uses, such as offices and retail stores, were displacing industrial uses.

For an overview of proposed development regulations in a new set of industrial zones that would update and replace the existing zones see the description of alternatives in **Chapter 2**.

Stadium Transition Area Overlay District (STAOD) (SMC 23.74)

In addition to zoning regulations in the Seattle Municipal Code for industrial zones, the areas around professional sports stadiums are subject to the Stadium Transition Area Overlay District. In 2000, the City established the STAOD, which is a 93-acre area comprised of Lumen Field, T-Mobile Field and surrounding areas to the east, west and south of those stadiums. The overlay district applied additional zoning standards beyond the base zoning to achieve certain goals for the district, including improving the pedestrian environment and connections to Downtown, discouraging encroachment into industrial areas, and permitting a mix of uses to support the pedestrian-oriented character of the area. For a summary of development regulations in the STAOD see **Appendix E**.

Shoreline Management Act & Shoreline Master Program

The State of Washington requires Cities and Counties to plan for how shorelines in their jurisdiction will develop through a Shoreline Master Program (SMP). The SMP must address a wide range of physical conditions and development settings along areas of the shoreline. The SMP prescribes different environmental protection measures, allowable use provisions and development standards for each of these areas of the shoreline. The method to account for different shoreline conditions is to assign an environment designation to each distinct shoreline section. The environment designation assignments provide the framework for implementing shoreline policies and regulatory measures specific to the environment designations. The shoreline environments within Seattle's Shoreline District are divided into two broad categories; Conservancy and Urban and then subdivided further within these two categories. Within the Urban category are the Urban Industrial (UI) and Urban Maritime (UM) designations. These shoreline designations are found on sections of Lake Union, Salmon Bay, Elliott Bay (Terminal 92) and the Duwamish where adjacent land is zone for industrial use. In cases where the development regulations in the SMP are more restrictive than the zoning regulations, the SMP supersedes. Shoreline Master program regulations provide additional controls and supports for the intended character and uses of unique shoreline lands. No amendments to the SMP are a part of the proposal studied in this EIS. See **Appendix F**.

Community Agreements

In addition to the above policy framework, some parts of Seattle's industrial lands are subject to community agreements. The Port of Seattle and the Magnolia Community Club and the Queen Anne Community Council have entered into a Short-Fill Redevelopment Agreement that establishes a neighborhood advisory committee to work with the port on disputes occurring during redevelopment activities and operations of Terminal 91 regarding light and traffic (**Appendix E**). This agreement does not regulate land use but is more of a mitigation vehicle for impacts resulting from T91 activities.

Planned Future Land Use

Exhibit 3.8-2 shows planned future land use for the study area. The Future Land Use Map (FLUM) is a required feature of the Comprehensive Plan under GMA. It indicates the city's policies and intent for guiding use of land in geographic areas over time. Seattle's industrial land (the study area) comprises approximately 12% of land citywide.

Manufacturing Industrial Centers (MICs). Most industrial land is within the two regionally designated MICs mapped with the MIC designation on the FLUM. The Greater Duwamish MIC is approximately 5,330 acres and stretches from the south end of downtown Seattle to the city's southern city limit. It includes land along the Duwamish River. The Ballard Interbay Northend MIC (BINMIC) is approximately 1,458 acres. It includes the lowlands along 15th Avenue and the rail tracks area stretching from north side of Elliott Bay to Salmon Bay. The BINMIC also include

shoreline lands along Lake Union and the ship canal, as well as uplands adjacent to the Ballard urban village.

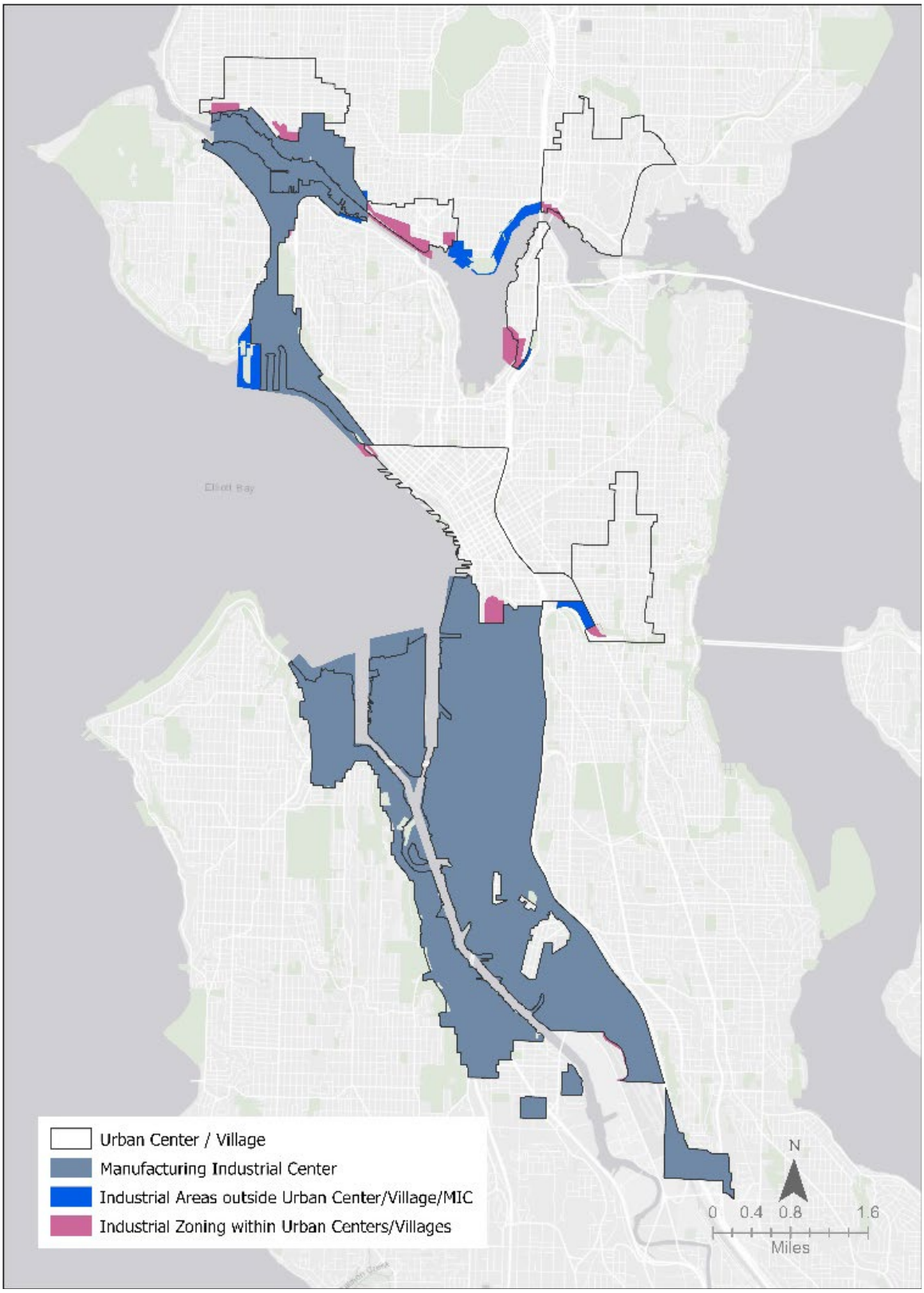
Land with a MIC FLUM designation is the subject of extensive policy guidance in the City's Comprehensive Plan and via regional VISION 2050 policy and designation criteria, and county-wide planning policies. The policy documents give these areas the highest priority for continued and ongoing future use primarily with industrial and maritime land uses. The policies prioritize industrial and maritime uses over stand-alone commercial and retail uses, and generally do not support residential uses. The City's practice has been to apply only industrial zone classifications within the MICs.[11]

Industrially Areas Designated Outside MICs. Not all the city's industrial land (study area) is within MICs. There are limited lands with a FLUM designation of "Industrial Areas" outside of the MICs. Pockets of designated Industrial Area are found on the north shore of Lake Union between the Fremont Urban Village and the University District Urban Center, between the I-90 ramps and Dearborn Street, and small collections of parcels north of NW Leary Way, by Nickerson Street, and north of Smith Cove Park near the Magnolia Greenbelt. Land in these areas is subject to the City's comprehensive plan policy guidance for "industrial areas" (policies LU10.1–10.31), but not the regional or county-wide policy framework for MICs. Similar to MICs, the City's practice has been to apply only industrial zone classifications to these areas.

Other Industrial Zoned Land. There are several areas of industrial zoned land in the study area in other FLUM classifications. These are areas with a history of industrial use adjacent to MICs or by shorelines that are now included in urban village growth areas. They include land in the west portion of the Ballard Hub Urban Village along NW Market Street, and a pocket of land south of the Swedish Medical Center. In the Fremont Hub Urban Village, a swath of industrially zoned land extends from NW 36th Street to the ship canal and near the base of Stone Way Avenue N. A small collection of parcels at the northwest corner of the University District Urban Center is zoned industrial. A pocket of industrial shoreline land on the east shore of Lake Union is in the Eastlake Residential Urban Village. The policy framework for industrially zoned land inside of urban villages is complex because industrial areas policies apply, but so do policies for urban villages. Urban village growth strategy policies are found in the Growth Strategy element and call for a mix of commercial and residential areas that can accommodate growth and are connected by transit. A wide range of commercial and mixed-use zones may be applied in areas designated as urban villages on the FLUM.

[11] The only exception is one parcel of land zoned Commercial in the BINMIC in Interbay on the site of the GM Nameplate facility that was the result of an industrial use expanding over time onto a commercially zoned parcel.

Exhibit 3.8-2 Future Land Use Map for Industrial Areas Within and Outside MICs



Source: City of Seattle, 2021.

Existing Zoning

Exhibit 3.8-3 displays the amount of existing zoning in the study area by zone classification. These figures also represent zoning under Alternative 1 No Action. The intent and features of the existing zone classifications are summarized above and in **Appendix E**.

Most of the study area is zoned either IG1 (52%) or IG2 (38%) reflecting how the IG zones are the foundation of the land use regulatory framework for the city's industrial areas. Only 10% of study area lands are in the IB and IC zoning classifications combined. A large majority of industrially zoned areas that are outside of designated MICs are zoned IC (86%). The IB zones only cover 5% of the study area in total and are found inside of the designated MICs.

The BINMIC has a greater share of land area in IC and IB zones (10% and 9% of the BINMIC respectively) compared to the Greater Duwamish MIC which is almost entirely zoned IG (95% of the Greater Duwamish MIC). This difference between the two MICs reflects the fact that the Duwamish has a greater degree of separation and physical boundaries at the MIC edges, while the BINMIC has a somewhat greater degree of physical integration with surrounding neighborhoods—befitting placement of the IB and IC zones.

Exhibit 3.8-3 Existing Zoning by MIC, Outside MICs, and Citywide

	BINMIC		Duwamish MIC		Outside MICs		Citywide Total	
Zone	Percent	Acres	Percent	Acres	Percent	Acres	Percent	Acres
Industrial General 1	56.52%	824	52.31%	2,787	5.41%	8	52 %	3,612
Industrial General 2	24.69%	360	43.80%	2,282	8.11%	12	38 %	2,661
Industrial Commercial	9.67%	141	1.46%	78	86.49%	129	5%	347
Industrial Buffer	9.12%	133	3.43%	183	0%	0	5%	316
Total	100%	1,458	100%	5,330	100%	148	100%	6,936

Source: City of Seattle, 2021.

Existing Land Use

This section characterizes existing land use conditions in the study area and breaks out land use features for the Greater Duwamish MIC and the BINMIC individually, and for the five EIS subareas where information is available and useful.

Exhibit 3.8-4 and **Exhibit 3.8-5** summarize the amount of existing industrial and non-industrial land uses in the study area for the BINMIC and north industrial areas and the Greater Duwamish MIC and south industrial areas. Existing land uses are the observed current activities on non-right of way land parcels. The assessment methodology for existing land use started with data provided by the King County assessor's office at the parcel level. However, sometimes assessor data is out of date or does not accurately reflect all the uses present. To address these

issues, input from stakeholders and manual scans by City staff and consultants were used to update the inventory. Data relied on are from the 2017 CAI Study that was updated and modified in 2020.[12]

Not all land designated for planning purposes as industrial, or that is zoned industrial has industrial land uses. The analysis shows on an area basis, how much of the study area is currently in use for industrial (**Exhibit 3.8-4**) and non-industrial (**Exhibit 3.8-5**) activity. The data also displays the size of lands devoted to specific land use categories.

In the BINMIC and north industrial areas 628 acres or 59.4% of land by area is in an industrial category. The largest industrial uses by area include marine terminals and industrial heavy marine, reflecting the large presence of Port of Seattle Terminal 91 and Fisherman's terminal, and the BNSF railyard. See also **Exhibit 3.8-6**.

In the Greater Duwamish and south industrial areas 3,249 acres or 80.4% of land by area is in an industrial use category. The largest industrial uses by area include transportation terminals, marine terminals, and warehouses reflecting the large presence of Port Terminals the SIG and Argo Rail Yards, and the network of other warehouse uses. See also **Exhibit 3.8-7**.

Office is the largest non-industrial land use in the BINMIC occupying over 9% of the land area. In the Greater Duwamish MIC, office is also the largest non-industrial use, but it occupies only about 3% of the land there. See **Exhibit 3.8-5**.

Exhibit 3.8-4 Industrial Land Uses by Area

	BINMIC and North Industrial Areas		Greater Duwamish MIC and South Industrial Areas	
Detailed Land Use	Net Acres	Percent	Net Acres	Percent
Industrial Gen. Purpose	48	4.5	295	7
Industrial Flex	0	0	2	0.5
Industrial Heavy	4	0.4	334	7.9
Industrial Light	32	3	122	2.9
Industrial Park	0	0	54	1.3
Industrial Staging	7	0.7	52	1.2
Distribution	2	0.2	27	0.6
Warehouse	61	5.8	577	13.6
Marine Terminal	157	14.8	665	15.7
Shipyard	32	3	20	0.4

[12] The methodology is documented on page 7 of the November 2017 CAI report, Industrial Lands Land Use and Employment Study: https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/DuwamishIndustrialLandsStudy/OPCDIndustrialLandUseEmploymentStudy1.pdf.

	BINMIC and North Industrial Areas		Greater Duwamish MIC and South Industrial Areas	
Detailed Land Use	Net Acres	Percent	Net Acres	Percent
Industrial Heavy Marine	112	10.6	97	2.3
Transpo Terminal	39	3.7	881	20.8
Railroad	30	2.8	145	3.4
Fleet Support Services	40	3.8	57	1.3
Utilities	62	5.9	50	1.2
Vocational Training	2	.2	13	0.3
Subtotal	628	59.4%	3,249	80.4

Source: City of Seattle, 2021.

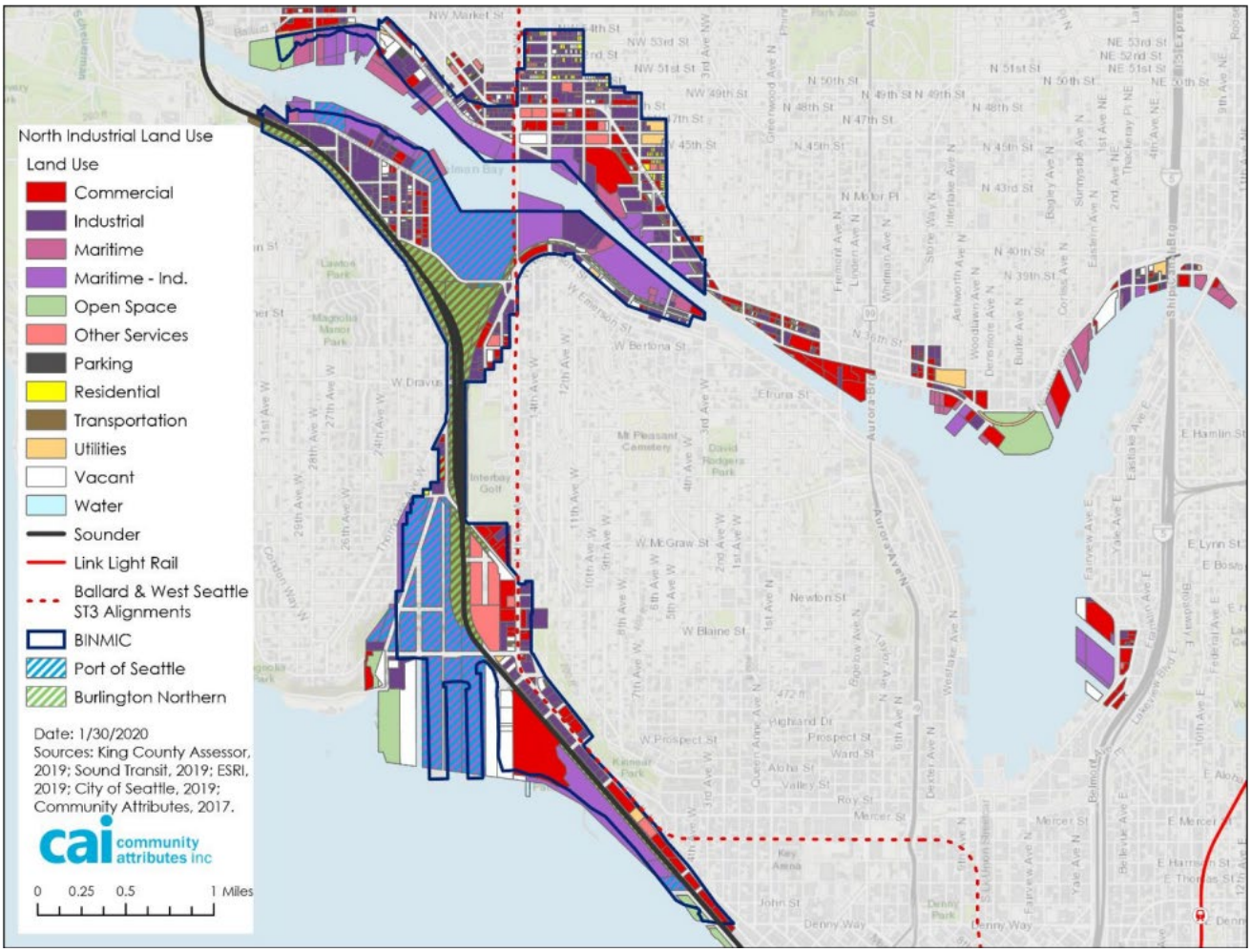
Exhibit 3.8-5 Non-industrial Uses by Area

	BINMIC and North Industrial Areas		Greater Duwamish MIC and South Industrial Areas	
Detailed Land Use	Net Acres	Percent	Net Acres	Percent
Accommodation	0	0	2	0.4
Artists' Lofts	0	0	1	.03
Marina	59	5.5	3	0.1
Office	101	9.4	139	3.3
Retail Trade	47	4.4	95	2.3
Auto Repair / Trade	2	0.2	9	0.2
Auto Dealerships	1	0,1	10	0.2
Warehouse (Comm)	8	0.7	19	0.5
Healthcare / Social Services	10	1	2	0.05
Animal Services	1	0.1	0.4	0.01
Public Service Facilities	23	2.1	3	0.1
Education	1	.1	0	0
Mail Processing	2	.2	5	0.11
Entertainment and Arts	2	0.2	49	1.1
Outdoor Vehicle Storage	1	.1	11	0.3
Religious Inst.	1	0.1	1	0.02
Single Family	4	0.4	11	0.3
Multi-Family	3	0.3	4	0.1

	BINMIC and North Industrial Areas		Greater Duwamish MIC and South Industrial Areas	
Detailed Land Use	**Net Acres**	**Percent**	**Net Acres**	**Percent**
Parking	12	1.1	107	2.5
Open Space	41	3.9	113	2.7
Miscellaneous (water, vacant land, unknown)	112	10.5	204	4.8
Subtotal	431	40.1	776.4	18.75

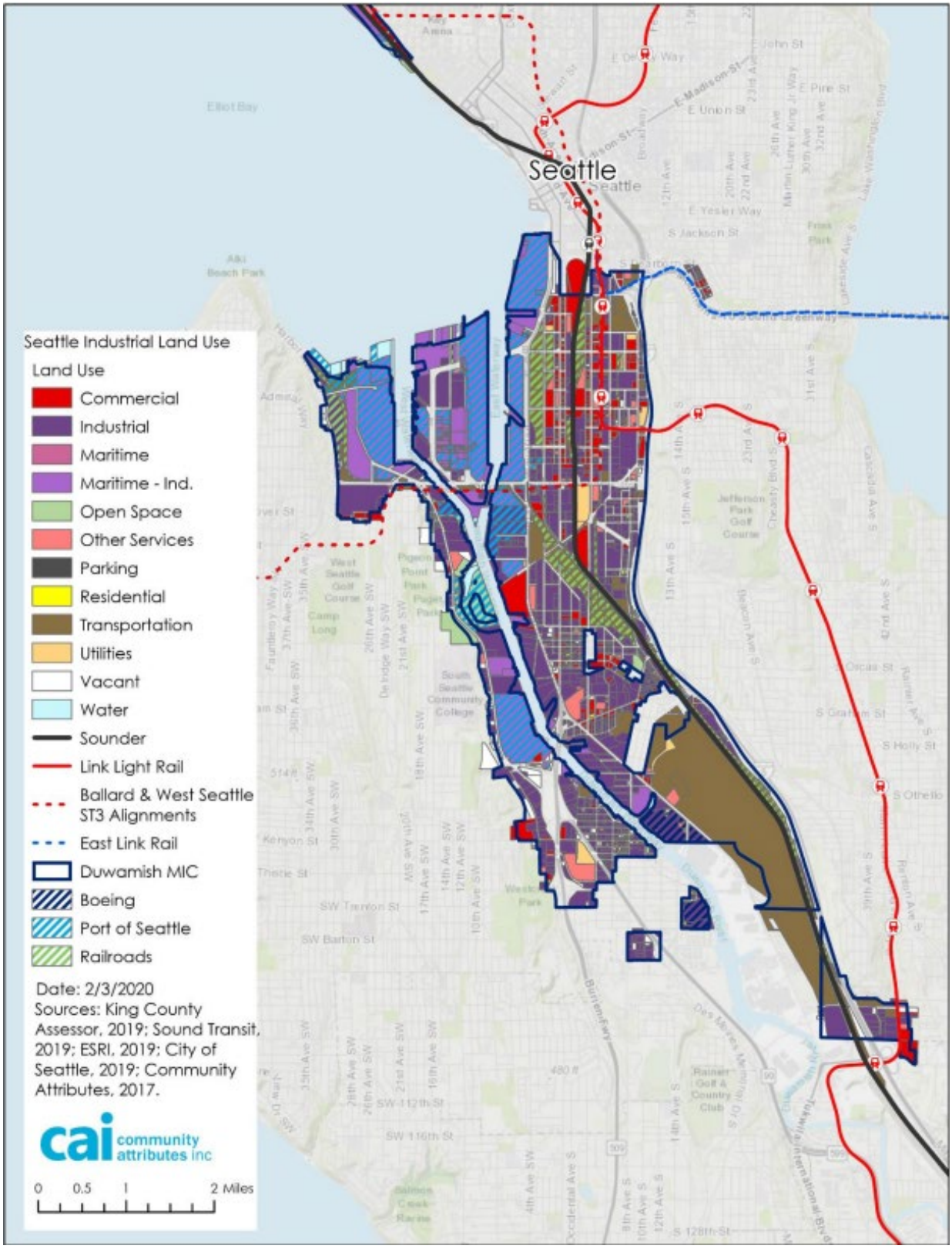
Source: City of Seattle, 2021.

Exhibit 3.8-6 North Industrial Land Use



Source: CAI, 2017, updated 2020.

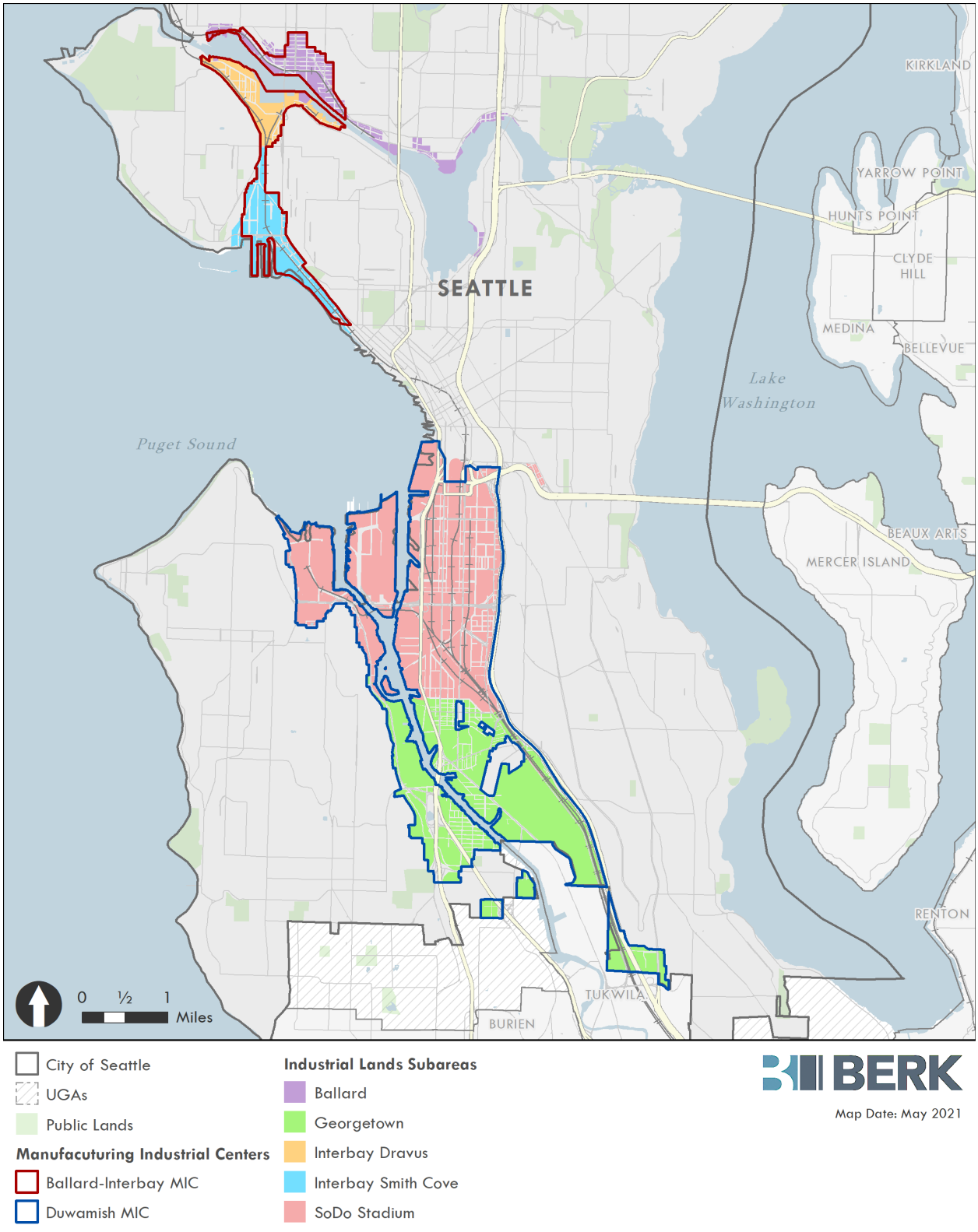
Exhibit 3.8-7 South Industrial Land Use



Source: CAI, 2017, updated 2020.

In addition to aggregate quantification of land uses, the qualitative analysis below highlights major features, important sites and uses, concentrations of activity, and notable adjacencies in the five EIS subareas (**Exhibit 3.8-8**). Characterizations inform a basis for identification of impacts in the EIS impact categories.

Exhibit 3.8-8 Industrial Subareas



Source: City of Seattle, 2021.

Ballard

The Ballard Subarea consists of the land between the Salmon Bay shoreline and the Ballard Urban Village. For the purposes of this analysis the subarea also includes portions of the study area in the Fremont Urban Village and along the north and east shores of Lake Union.

The study area includes an extensive stretch of shoreline along the north shore of Salmon Bay. Shoreline lands are in the designated MIC from the Hiram Chittenden locks at the west to 3rd Avenue NW at the east. This portion of the shoreline contains a variety of maritime uses and marine services on a series of docks and piers that extend into Salmon Bay. There are industrial marine services and businesses primarily in the west portion including Trident Seafoods, Stabbert Marine Industrial shipyard, Waypoint Marine, and others. Closer to the Ballard bridge is a higher concentration of recreational marina services, and Seattle Maritime Academy.

The Ballard uplands south of Leary Way include a series of large parcels or whole blocks that developed with large footprint non-industrial uses. Seven non-industrial use developments are located in close proximity to one another: Ballard Blocks 1, Ballard Blocks 2, former New Seasons, UW Medical, Big 5 Sports, Office Depot, Fred Meyer. Together these non-industrial uses occupy about 22 acres of land. They contain retail and office activities unrelated to industrial and maritime sectors and draw volumes of users into the area. A wide variety of industrial uses are co-mingled and adjacent to or across the street. The variety of industrial activities includes car repair services, building/trades supply, and other light manufacturing. Other large-footprint uses of note in this area include the Quest church at Leary/14th Avenue NW, and the whole-block USPS mail distribution facility at 11th Avenue NW/ NW 46th Street.

The Ballard uplands north of Leary Way include a diverse array of industrial, commercial/retail, office storage and even some residential uses. There is a high concentration of breweries and tap rooms. Reuben's Brews, Urban Family Brewing, the Fremont Brewing production facility, Stoup Brewing, Fair Aisle Brewing, Bale Breaker and Yonder Cider Tap Room, Peddler Brewing Company and others are located here. Several large-scale industrial operations that occupy whole blocks are present including Rudd Company paint manufacturer and Bardahl Manufacturing, a maker of petroleum oil additives, lubricants and gasoline additives that are sold worldwide, and has operated in Ballard since 1939. There is an eclectic mix of retailers, many related to hardware and automotive. The large, new West Woodland building is a multi-story light industrial structure. A few scattered non-conforming residential single family and multi-family homes are found in blocks flanking 14th Avenue NW towards the north end of the subarea.

A portion of the subarea is in the Fremont Urban Village. Parcels fronting N 36th Street are small and only about 115 feet deep. The parcels have a high concentration of non-industrial uses especially bars and restaurants, which are generally accessed by patrons on foot from the N 36th Street frontage. A topography drop is present at the alley to the rear of those parcels, and from this alley south to the ship canal parcels sizes are generally larger. Land uses in the area include several large-scale office, software and technology uses including the Google and Adobe campuses, some of the Tableau offices, a biotechnical laboratory company, and the

Burke Building offices. This cluster of uses is sometimes referred to as the Silicon Canal. There are no marine uses fronting this section of the ship canal, and the water's edge is primarily a recreational and open space feature experienced by users from the Burke Gilman trail, which runs along it. Industrial uses are mixed in this geographic area including a large footprint film/sound studio company, a distillery, craft manufacturers, and the Theo Chocolate company which includes production, and retail activities.

The study area includes waterfront land and adjacent uplands from the east edge of the Fremont Urban village to the southwest corner of the University District Urban Center. The shoreline has a consistent string of marine uses on a series of docks and piers extending into Lake Union. Recreational marine activities are present including three marinas, as well as industrial maritime activity such as the North Lake shipyard, a divers training school, and the police department harbor patrol site. Recreational and open space uses are integrated into the area with the presence of the 20-acre Gas Works parks and the Burke Gilman Trail. About four blocks of upland are included in the study area near the corner of the Stone Way N / N 35th Street Intersection. The only significant industrial activity in this pocket is the Seattle Public Utilities transfer station. Non-industrial uses include recently constructed offices of Brooks headquarters, and Tableau software's new structure between Woodlawn Avenue N and Densmore Avenue N. Other uses include restaurants, bars breweries and retail uses.

The study area includes one shoreline area on the east bank of Lake Union between E Newton Street and E Nelson Place. Waterfront uses are all marine uses with substantial dock infrastructure, including US Seafoods, and the Lake Union Dry Dock, and Seattle Seaplanes. The limited upland uses in this area are dominated by biotechnical / laboratory uses.

Interbay Dravus and Interbay Smith Cove

The Interbay Dravus and Interbay Smith Cove subareas consists of three distinct nodes—Fisherman's Terminal and vicinity, Dravus, and Smith Cove. This subarea stretches from the southern shoreline of Salmon Bay between the locks and ship canal on the north and Elliott Bay to the South. It is bound by the Queen Anne and Uptown neighborhoods to the east and Magnolia to the west. This Subarea contains a significant number of Port of Seattle facilities (Terminal 91, the Terminal 91 Uplands, and Seattle Fisherman's Terminal), the Washington State National Guard Armory, the BNSF switching yard and maintenance facility, and a mix of industrial, retail, and office uses.

The southern shoreline of Salmon Bay between the Hiram Chittenden Locks and 3rd Avenue NW is developed with significant maritime industries, general industrial uses, and the Port of Seattle's Fisherman's Terminal. These maritime uses include shipyards, marine terminals, fishing, and warehousing. Immediately adjacent to the shoreline uses is the BNSF switching yard creating a southern edge to this subarea. This land is zoned IG1 and is within the BINMIC. The Port of Seattle has recently completed work on the Maritime Innovation Center to incubate the next generation of maritime companies and has future plans for additional development of facilities to support the maritime industry.

South of the Fisherman's Terminal area and separated by BNSF tracks is the Dravus area. This area is 21 acres in size and includes 7 acres of mixed-use zoning and 14 acres of land zoned IG1 located within the BINMIC. This area is bound by the BNSF rail corridor to the west and north, 15th Avenue W to the East and the Interbay Golf Center to the south. The industrially zoned property is developed with a mix of manufacturing, warehousing, and office uses. In the future this area may be the location of a Sound Transit light rail station and a Seattle Storm practice facility. The future light rail station has the potential to substantially reduce the industrial capacity of this area depending on future decisions regarding station location and whether the crossing at salmon bay will be above ground or by way of a tunnel. In 2006, the seven acres south of the IG1 zoned area was rezoned from Commercial 2 (C2) to Seattle Mixed Dravus (SM-D). The C2 zone designation prohibited residential development unless approved by a conditional use permit. One condition was that the area is not proximate to an industrially zoned area. The rezone from C2 to SM-D allowed recent mixed-use residential development in this area.

Smith Cove is the southern boundary of the BINMIC. This area includes major port facilities (Terminal 91 and the Terminal 91 Uplands), the Washington National Guard Armory, the corporate headquarters for Expedia, and a diverse mix of maritime, industrial, commercial, and retail uses. Zoning in this area is IG 1, Industrial Buffer (IB), Industrial Commercial (IC). Smith Cove is also the site of a proposed Sound Transit light rail station and line. Major property owners in this area include the Port of Seattle, the State of Washington, and development companies that own office and retail projects in this area.

Port facilities in the Smith Cove area play an important and expanding role in Seattle's maritime sector. Terminal 91 provides short-term and long-term moorage for fishing and commercial vessels, including factory trawlers, long liners, tugs, barges, ferries, research vessels, and ships of state, military, and commercial vessels for lay-up or idle. Terminal 91 includes fish processing and cold storage facilities, access to vessel repair and services, fueling by barge, and on-terminal rail access. Upland from Terminal 91 is the Port of Seattle's Terminal 91 Uplands development project. Over the next 10-15 years, this two-phase project will construct flexible, light industrial building space to support maritime manufacturers and fishing industry suppliers in the BINMIC. Phase I will develop 100,000 square feet of light industrial space with minimal site infrastructure improvements. Phase 2 will involve construction of approximately 300,000 square feet of additional industrial space along with extensive utility improvements.

To the east of Terminal 91 is the Expedia Corporate Campus. This project is part of Seattle's technology sector and consists of several large office buildings and a significant parking garage. This land is zoned IC. Seattle adopted the IC zone in 1988 with the intention that it allow for industrial uses and importantly research and development offices. This zone in other areas of Seattle is home to technology companies including Google and Adobe in Fremont. Stretching south from Expedia along Elliott Avenue W, land is zoned primarily IC and is developed with multiple office buildings, warehouses, retail, and limited industrial uses.

Directly east of the Port of Seattle's Terminal Uplands project, separated by the BNSF rail corridor, is the Washington State Armory. This site is approximately 26 acres in size and is the staging facility for the National Guard emergency response and other activities. This site is zoned IG2 and is located within the BINMIC. Currently, the State of Washington is exploring options to relocate this facility and redevelop this site. Adjacent to this site to the north and east is significant retail development. These retail developments are allowed by existing zoning but not the intended use for the IG2 zone.

SODO/Stadium

The SODO/Stadium Subarea includes the mouth of the Duwamish River where it outlets to Elliott Bay. There are a concentration of maritime installations and terminals at and around the Duwamish River shoreline and Elliott Bay. This includes Harbor Island, with major shipyard terminals of Vigor Shipyards and Crowley Marine as well as Port of Seattle Terminals 5 and 18 that handle container cargo, and pier 30. Terminal 5 is completing major investment and upgrade. These locations feature on-terminal rail. Other marine activity includes the Coast Guard base, which is a homeport of arctic icebreakers. Port of Seattle's Terminal 46 at the north end of the subarea is currently vacant. Potential plans for conversion to a cruise ship terminal are on hold.

SODO contains the BNSF Stacy railyard. The Stacy Yard hosts transloading—a practice whereby containers are transferred from ships via short-haul trucking and loaded onto trains. SODO also is home to the Union Pacific Argo Yard, south of Spokane Street near Georgetown. The heavy rail line bisects SODO with tracks that carry train traffic to destinations north and south. Other rail-related facilities include the Amtrack maintenance facility, and some direct rail connectivity to logistics businesses.

The presence of rail and marine infrastructure supports a cluster of logistics focused businesses in SODO and other businesses dealing in heavy materials that are dependent on rail and/or marine infrastructure. Examples are numerous and include Ash Grove Cement, Alaskan Copper, and Nucor Steel, Alaska Marine Lines, MacMillan Piper, and Republic Services (a refuse transfer station and recycling facility). Rail and marine terminals have been a fixture in the area for at least 100 years.

The Stadium area is home to Seattle's professional football/soccer and baseball stadiums as well as other event venues, the WAMU theater, Showbox SODO. These facilities draw large volumes of visitors to a range of events. The stadiums are integrated functionally with Pioneer Square, Downtown and C/ID to the north. In the stadium area there is a more consistent presence of open spaces, sidewalks than in other parts of the subarea.

The WOSCA site is a notable vacant piece of land. It is approximately 6 acres located between the stadiums and SR 99 infrastructure and Terminal 46. The site was used as construction staging by WSDOT and is potentially eligible for future reuse.

Major non-industrial employers are in the SODO/Stadium Subarea. Starbucks corporate headquarters and the Seattle School District's John Stanford Center are two large offices located in the Lander Street corridor, and the Army Corps of Engineers has offices near Diagonal Avenue S. Significant non-industrial retail is located throughout SODO including the Home Depot, and Costco Wholesale at 4th Avenue S, south of Spokane Street.

The district hosts large public utility operations that occupy expansive swaths of land. The King County Metro Central Base is west of the stadiums, the Sound Transit Operations and Maintenance Facility is south of S Forest Street, and the Seattle City Light South Service Center is to the south of Spokane Street.

Throughout the SODO/Stadium Subarea there are numerous craft business and activities. A concentration is evident along the 1st Avenue S corridor to the south of the stadiums. The stretch includes maker businesses that attract visitors and have a sense of design orientation to customers. Examples include Macrina Bakery, Westland Distillery, Filson, and others.

There is a significant cluster of auto-oriented sales and service business in the Airport Way corridor. In blocks to the south of S Holgate Street large-sized auto dealerships for Honda, Toyota, and Mercedes Benz area present. The general vicinity also includes multiple auto maintenance and repair shops.

Important adjacencies include interfaces with Pioneer Square and Chinatown / ID at the north end, as well as the edges of the West Seattle and Delridge residential neighborhoods. However, most other edges of SODO have strong physical buffers to non-industrial areas. This include I-5 at the east and the steeply sloped and heavily wooded greenbelt to the west, and waters of Elliott Bay to the north.

The Duwamish Longhouse is located on west bank of Duwamish River south of Harbor Island, overlooking the Duwamish River Valley, near the village called hah-AH-poos, a major archeological site known as Duwamish Site No. 1. The Longhouse is among a cluster of open spaces that are some of the only remaining vestiges of natural shoreline conditions along the lower Duwamish River. Kellogg Island and Terminal 107 Park is an approximately 60-acre natural area owned by the Port of Seattle. Adjacent to the north of this green space is Herring's House Park, a 6.5-acre open space owned by the City of Seattle Department of Parks and Recreation. The Duwamish Longhouse is directly across W Marginal Way from these open space resources. More greenbelt land owned by Seattle Parks is behind the longhouse in the wooded and sloping areas of Pigeon Point Park, the West Duwamish Greenbelt and Puget Park. Duwamish Tribal Services hosts community gatherings, meetings at the longhouse and is seeking to expand the facility to support the social, cultural, and economic survival of the Duwamish Tribe. The organization intends to display artifacts and to create interpretive exhibits and tours to maximize its cultural and recreational public use. See **Exhibit 3.8-9**.

Exhibit 3.8-9 The Duwamish Longhouse

The Duwamish Longhouse

The Duwamish Longhouse is located on the west bank of Duwamish River south of Harbor Island, overlooking the Duwamish River Valley, near the village called hah-AH-poos, a major archeological site known as Duwamish Site No. 1. Duwamish Tribal Services hosts community gatherings and meetings at the longhouse, and is seeking to expand the facility to support the social, cultural, and economic survival of the Duwamish Tribe. The organization intends to display artifacts and to create interpretive exhibits and tours to maximize its cultural and recreational public use.

Source: BERK, 2021.

Georgetown/South Park

Georgetown is situated on the east bank of the Duwamish River. The riverfront contains numerous heavy industrial operations including cement, materials, recycling/refuse handling and logistics companies that rely on barging and water access, and the Ardagh glass manufacturing facility. Other notable shoreline uses include the Army Corps of Engineers offices at Diagonal Avenue S.

Georgetown's industrial uplands between the Union Pacific Argo Rail Yard and E Marginal Way S contain a high concentration of logistics and warehousing activities. Many of these buildings are characterized by warehouse structures with loading docks and bays and large access areas for truck turning. The Prologis Georgetown Crossing facility is a notably new warehouse and distribution center constructed in 2017, because it includes multiple levels of stacked

warehouse space. Interspersed among logistics operations there is a wide variety of small and medium sized industrial supply businesses, small offices, manufacturers and makers including the Equinox Studios campus, and South Seattle College. The area also contains multiple breweries and distilleries including Georgetown Brewing at the east end of Lucille Street.

Boeing's campus and the King County International Airport / Boeing Field are located at the south edge of industrial Georgetown and extend south outside of Seattle's city limit on both sides of E Marginal Way. The airport averages 180,000 takeoffs and landings each year. The airport serves small commercial passenger airlines, cargo carriers, private aircraft owners, helicopters, corporate jets, and military and other aircraft. It's also home to various Boeing Company operations.

The study area surrounds two residential neighborhoods areas in Georgetown—the Van Asselt district between Ellis Avenue S and Corson Avenue S and a roughly four-block residential district between S Homer Street and S Fidalgo Street Both include townhomes, single family and multifamily housing including some new construction. Residents of these areas are closely adjacent to the surrounding industrial activities. The study area also surrounds blocks of commercially zoned land along 4th Avenue S and Lucille Street, and the S Albro Place corridor that contain a variety of retail and service uses. At the time of this writing a mixed residential development was proposed for the commercial areas on 4th Avenue S.

The triangular area bounded by Corson Avenue S, Carleton Avenue S and I-5 contains a high concentration of retail and restaurant businesses fronting onto Airport Way S. This stretch contains a string of notable brick historic structures including the historic Georgetown Brewery complex that backs up to the rail line on the east side of Airport Way. These structures are now occupied by a variety of small business. Several historic storefronts on the west side of Airport Way contain restaurants and coffee shops and the Georgetown Ballroom. The area attracts visitors and events unrelated to industrial activities. The west portion of the blocks in this triangle (off of the Airport Way) include construction and building supply firms, warehouse structures, and other light industrial uses. A little-used Union Pacific Rail spur bisects the triangular area.

South Park is situated on the west bank of the Duwamish River. The study area contains the industrial lands that surround the South Park neighborhood, which is a mixed-use neighborhood that is designated residential urban village in Seattle's Comprehensive Plan.

Like Georgetown's riverfront, the South Park riverfront in the study area contains numerous heavy industrial operations that rely on marine transport including the Duwamish Shipyard, materials handling and logistics companies, and marine services. Riverfront operations south of State Route 509 are on smaller shoreland parcels, while operations north of SR 509 are large on shoreland parcels 20 acres or larger.

Upland uses in the study area that are north of the South Park urban village include a variety of distribution and logistics activities, small manufacturing, construction related businesses, small offices, and marine and industrial supply companies. This mix of light and heavy industrial uses

closely borders the north edge of the South Park urban village. Duwamish Waterway Park is a 1.26-acre open space bordering the river at the northwest corner of the South Park Urban Village affording some river access. Lands near the SR 509 ramps at S Cloverdale Street, and S Holden Street contain large footprint uses of the South Transfer Station and the First Student bus parking yard, and Waste Management services.

Portions of the study area to the south of the South Park Urban Village flank the offramps of SR99 at 14th Avenue S. A high concentration of land uses here appear to be transportation oriented including distribution and warehousing, materials supply, and building materials. Many structures have loading docks and truck access and circulation. Other land uses include union hall offices and the currently vacant Boeing Radiation Effects Lab and Boeing South Park facilities, which closely border the edge of the urban village. In addition to industrial marine activities on the riverfront, the Duwamish Yacht Club is located on the riverfront here.

Land at the base of the South Park bridge, bordering the river and the urban village is outside of Seattle city limits and outside the study area. For reference, that land contains a mix of neighborhood-residential uses, the South Park Marina, and Port of Seattle's Terminal 117, which is being converted into a 2+ acre river front park.

Adjacent to the study area, residential uses inside the urban village are primarily single-family homes, with some multifamily housing near arterial roadways. In several locations such as the vicinity of S Southern Street, 8th Avenue S, 5th Avenue S and others, residential uses are closely adjacent to industrial activities such as a transit van company, a portable toilet company, and an equipment supply company as examples.

Existing Employment Mix

Employment mix is addressed in the land use section because City and regional land use policies encourage employment in industrial and maritime sectors. A chief intention of industrial lands policies is to foster living wage employment opportunities and economic development associated with industrial and maritime sectors, and for diversification of the economy. (See plans and policies description above.) Existing employment on study area land in thirteen industry sectors is characterized in **Exhibit 3.8-10** and **Exhibit 3.8-11**. There is a total of 98,500 jobs. The analysis characterizes employment in industry sectors of interest, where there are agglomerations of related supporting economic activity. Methodology is from the 2019 CAI study.[13]

[13] The methodology is documented on page 7 of the November 2017 CAI report, Industrial Lands Land Use and Employment Study: https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/DuwamishIndustrialLandsStudy/OPCDIndustrialLandUseEmploymentStudy1.pdf.

Exhibit 3.8-10 Industrial Areas Employment by Economic Sector

Industry	2018 Industrial Areas Employment
Hospitality & Tourism	6,700
Construction & Utilities	13,700
ICT	8,200
Distribution & E-commerce	8,500
Food & Beverage Production	3,800
Aerospace	6,300
Transportation & Logistics	5,500
Maritime	8,600
Other Manufacturing	5,900
All Other Retail	3,400
All Other Services	21,400
Government	5,300
Education	1,200
Total	98,400

Source: CAI, 2020.

Employment in the study area and subareas can also be analyzed according to the quantity of jobs in industrial vs. non-industrial classifications. It is not straightforward to classify jobs as industrial or non-industrial. Methods in this analysis are from the 2019 CAI study. As seen in **Exhibit 3.8-11**, 55.3% of all employment in the study area is industrial and the percentage of industrial employment in all subareas is above 50%.

Exhibit 3.8-11 Industrial and Non-Industrial Employment by Sub-Area, Current Conditions (2018)

Subarea	2018 Industrial Emp.	2018 Total Emp.	% Industrial
Ballard	9,400	17,100	55.0%
Interbay Dravus	3,400	5,600	60/7%
Interbay Smith Cove	3,900	6,000	65.0%
SODO/Stadium	23,000	43,900	52.4%
Georgetown/South Park	14,900	25,900	57.5%
Total	54,500	98,500	55.3%

Note: Methodology is documented on page 7 of the November 2017 CAI report, Industrial Lands Land Use and Employment Study: https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/DuwamishIndustrialLandsStudy/OPCDIndustrialLandUseEmploymentStudy1.pdf.
Source: CAI, 2020.

3.8.2 Impacts

As described in the introduction to this section, four impact categories were used to identify potential adverse land use impacts for the study area broadly and on a subarea level (where applicable): consistency with plans or policies, land use compatibility, employment mix, and land use transitions. The alternatives are expected to result in a land use impact if:

- **Consistency with plans and policies.** The action would result in an inconsistency between the predominant land use pattern and the stated land use goals and policies in the Comprehensive Plan and/or the VISION 2050 regional growth plan, Countywide Planning Policies, or Shoreline Master Program. The action would introduce a land use pattern that would foreclose future opportunities to reach goals and polices.[14]
- **Land use compatibility.** The action would cause an increase in the prevalence of disparate activity levels and use patterns that would result in incompatibilities within industrial zones. Incompatibilities could undermine industrial and maritime operations, or the comfort and safety of employees or residents. Incompatibilities could be related to time of day/night activity, noise levels, odors, and conflicting movements by vehicles and other modes.
- **Employment mix.** The action would lead to changes to employment mix that would decrease the percentage and total quantity of jobs related to or supportive of industrial and maritime sectors, in MICs. The action would cause a high likelihood of voluntary or involuntary economic displacements of businesses in industrial maritime sectors widely throughout a subarea. It would preclude new opportunity for expansion of industrial and maritime employment through business formation and retention.
- **Land use transitions.** The action would create a land use pattern where high intensity / high impact uses would be likely to abut or encroach or impacts related to height, bulk, scale and aesthetics on adjacent non-industrial uses and concentrations of residential populations.

Not every adverse land use impact identified within the impact categories would result in a significant adverse impact as some impacts are an expected part of a changing urban environment. Land use impacts of the alternatives are considered significant if they would result in more than a moderate adverse impact regarding:

- An acute/severe adverse impact within one of the impact categories defined above.
- Cumulative land use impacts in multiple categories within one of the defined subareas.

The terms "**minor**" and "**moderate**" are also used in the assessment to describe relative levels of impact below the threshold of significance. Minor is used to describe a level of impact that is barely perceptible, de minimis or questionable as to whether it would materialize at all.

[14] It is not practical to summarize consistency with every policy or goal. Select policies or goals with notable factors towards consistency or inconsistency are described, and a general summary of the level of consistency with the full range of policies is provided under each alternative.

Moderate is used to describe a level of impact that would clearly be perceptible, have a tangible influence, yet not exceed the threshold for significance.

Optional economic analysis. The City is not required to address purely economic impacts on individual businesses in environmental analysis (SMC 25.05.440 F.3). In scoping, some commented that if certain land uses are not permitted under an alternative (i.e., unlimited housing) landowners would be less likely to invest in improvements and development, which would lead to economic blight. Comments are addressed in the scoping report (**Appendix A**). A wide variety of land uses would be allowed in the study area under all alternatives sufficient for robust economic use of property. However, purely economic factors for individual businesses are not an element of the environment to be analyzed and therefore are not considered a factor in determining significant impacts. The City includes at its option some non-environmental economic analysis of development feasibility.

Organization of the impacts analysis. The first portion of the impact analysis under each alternative describes the likely changes over the 20-year planning horizon under the alternative in the topics areas of land use planning and policy context, future land use, zoning, land use, and employment mix. The changes are also described in the description of alternatives in **Chapter 2**, which should be read in conjunction with this Land Use Chapter. The assessment of impacts follow the descriptions.

Equity & Environmental Justice Considerations

While shoreline and land use impacts are expected to be less than significant under all alternatives, some of the identified impacts could have equity and environmental justice considerations.

Land use transition impacts would raise environmental justice concerns where residents of nonindustrial areas in or adjacent to the study area could be adversely affected by inadequate transitions at the edges of industrial areas. In areas of inadequate transitions, impacts from noise, odors, and truck access and circulation associated with industrial land uses could affect communities of color and economically disadvantaged people. Impacts of increased building height, bulk and scale at transitions could also affect vulnerable populations. The neighborhoods of Georgetown, SODO, and South Park are vulnerable because there are land use transition impacts and they have populations with higher levels of disadvantage as seen in **Exhibit 1.7-7**. However, the proposal includes features with potential to improve transitions as well, especially the expected development in the Urban Industrial zone.

Land use compatibility impacts could have equity and environmental justice considerations. Introduction of new buildings with dense employment in the II zone and industry-supportive housing in the UI zone could create incompatibilities between new activity patterns and adjacent areas of continued industrial uses. There is potential for new employees or residents in the rezoned areas to be vulnerable populations at a relatively higher rate. Adverse localized

impacts on these community members could result from increased exposure to freight traffic and other challenges of working or living in the area.

In general, it is expected that the proposal will have positive equity affects related to the employment mix. Under all alternatives, employment in the study area would increase including industrial employment. A high proportion of jobs in industrial and maritime sectors are accessible without a traditional four-year degree and many remain unionized with high quality benefits. With increased employment training opportunities focused on equitable access, vulnerable populations could benefit from increased employment in industrial and nonindustrial sectors.

While impacts on vulnerable communities are identified, a range of existing regulations and commitments and potential mitigation strategies will reduce the harmful impacts of the proposal related to land and shoreline use.

Impacts of Alternative 1 No Action

Likely Changes Over the 20-year Planning Horizon

Land Use Planning & Policy Context. Under Alternative 1 the planning and policy context would be unchanged from existing conditions. No changes to the Comprehensive Plan or policy framework would be enacted. Existing Comprehensive Plan land use policies (without amendment) summarized above in **Local Policy Framework** would continue. There would be no updates to the currently adopted Sub Area Plans for the Greater Duwamish MIC and BINMIC.

Future Land Use. Under Alternative 1 the future Land Use Map for the study areas would be unchanged. Future land use categories would be the same as shown in the existing conditions section in **Exhibit 3.8-2** above. No specific lands would be added to or removed from the MICs under Alternative 1. However, because regulations allow for annual amendment proposals to the Comprehensive Plan, some land could be removed from MICs over the 20-year planning horizon as a result of individually proposed annual amendments.

Zoning. Under Alternative 1 zoning would be unchanged. Development standards for the city's four existing industrial zones (IG1, IG2, IB, IC) would be unchanged from those summarized above in **Local Policy Framework**. No changes to the zoning maps would be proposed. However, because regulations allow for annual amendment proposals to the Comprehensive Plan and contract rezones, some land could be removed from MICs over the 20-year planning horizon as a result of individually proposed zoning changes.

Land Use. Under Alternative 1 land use would continue to evolve over the planning period according to current trends and the parameters of existing zoning. Some notable expected changes could include.

- **Continued conversion to office and retail uses in IG zoned areas.** Consistent with recent trends, more stand-alone retail and office structures similar to the Armory Way shopping center or Ballard Blocks would be anticipated. Developments would maximize current IG zone maximum size of use limits for offices and retail. Areas that could see increased concentrations of such development would be in Fremont, Ballard, Interbay Smith Cove, and Georgetown/South Park.
- **Continued development of large offices in IC zoned areas.** Consistent with recent trends, more large office development would occur in IC zoned areas with no inclusion of industrial uses. This would be expected in the stadium area and the Elliott Avenue corridor and areas of Ballard.
- **Interim timeframe, some lack of investment.** In the first half of the planning horizon some disinvestment could be expected for land parcels close to future ST station areas at SODO/Lander, W Dravus Street, and Ballard as landholders would not be likely to invest in new development in areas of aging infrastructure on large parcels near stations, in anticipation of future rail.
- **Continued addition of distribution and warehouse facilities.** Continued addition of some new distribution and warehouse facilities would be expected in the study area.
- **Little or no new housing.** Only about 75 new homes would be added in caretakers' quarters and artist/studios.
- **Maintenance of maritime and industrial base.** Most long standing maritime and logistics uses would continue on waterfront lands and industrial lands near infrastructure, especially in the Duwamish.
- **Armory Site Redevelopment.** Under Alternative 1 the Armory site would be developed with light industrial and flex space of a relatively low-density nature after relocation of the Army National Guard to North Bend, WA.
- **Piecemeal conversions of parcels from industrial to non-industrial.** Annual comprehensive plan applications for amendment would allow for piecemeal removal of parcels of land from the MIC and conversions to non-industrial zoning. The location and amount are not known.

Employment Mix. Under Alternative 1 employment is projected to grow incrementally in proportions similar to trends from the last 10-20 years. A total of 23,500 additional jobs are projected for the study area, an increase of 24%. Job growth in the study area would be estimated to be about 14% of expected citywide job growth over the 20-year planning horizon. The percentage of industrial employment would decrease slightly by 0.9% points. Both MICs would continue to contain many more than the minimum number of industrial jobs required to meet PSRC's regional criteria for MIC designation (20,000). See **Exhibit 3.8-12**.

Exhibit 3.8-12 Employment by Subarea, Current Conditions and Alternative 1

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

Source: City of Seattle, 2021.

Consistency with Plans & Policies

Although there would be no changes to plans and policies under Alternative 1, some inconsistencies with plans and policies are expected to increase due to the evolution of land use during the study time horizon under Alternative 1.

Conditions in both the Greater Duwamish MIC and BINMIC would still meet PSRC's regional criteria for designation as an Employment Center MIC.

- 75% land zoned for core industrial uses. Under Alternative 1 the IC zone would not be considered a core industrial zone satisfying the PSRC criteria because zone development under existing standards would increasingly be dominated by office-only uses. Nonetheless, 90% of land in the BINMIC would be in core industrial zones, and 97% of land in the Greater Duwamish MIC would be in core industrial zones.
- Employment would remain over 50% industrial.
- Employment would remain far above 20,000 jobs.

Land use changes under Alternative 1 would continue to be consistent with most of the planning goals and policies of the City's Comprehensive Plan, SMP and regional plans. However, an incremental degree of inconsistency would arise with respect to select policies, because of development trends towards continued conversion to office and retail uses in IG zoned areas, and continued development of large offices in IC zoned areas. The resulting land use trend would be somewhat inconsistent with policy 10.2 (preserve land for industrial uses), and 10.17 (avoid attracting large numbers of visitors), and Container Port Element policy CP3 (discouraging retail and residential uses).

Localized areas where the inconsistency would increase would be upland areas in the Ballard, Interbay Dravus, Interbay Smith Cove, and SODO/Stadium subareas. In general inconsistency with policies would be largest in areas in proximity to the future light rail station and in proximity to areas that have strong demand for residential development. This would result in a **moderate** impact in this category due to inconsistency with plans for portions of the study area.

Land Use Compatibility

Under Alternative 1 No Action, land use incompatibilities would be similar to those observed today but would become more severe over time with continuing trends. Expected incompatibilities in localized areas are summarized below:

Ballard

Conflicts in the Ballard uplands in the 14th Avenue corridor north of NW Leary would increase and would manifest as increased difficulty for larger and long-standing industrial operations due to access and congestion constraints as a result of increasing non-industrial office and retail uses. Similar pressure would be exerted on remaining shoreline industrial/marine activities, as visitors of non-industrial activities congest roadways and access points to shoreline operations. Noises, visual impacts, and odors received by an increased number of non-industrial visitors to the area would also result. However, with limited opportunities for housing and the sporadic nature of nonindustrial visits the impact would be **moderate.**

Interbay Dravus

Incompatible use conflicts would be about the same as today in this area. Maritime and shoreline areas such as Fisherman's Terminal and areas along W Commodore Way would continue to be well-buffered from encroaching uses, and rail yards and facilities would not change substantially. The biggest land use changes would occur in areas near the future rail station between BNSF rail tracks and 15th Avenue W north of W Dravus Street where construction of light rail infrastructure and infill development under IG zoning would be expected. But this triangular area already contains few extensive heavy industrial uses, and few new conflicts exceeding today's level are expected. If parcels adjacent to BNSF tracks develop with non-industrial uses some minor impact due to noise and vibration as experience by future tenants could result but because prohibitions on new residential development would limit nonindustrial activity to commercial uses which are less sensitive to noise and vibration than residential uses, the impact would not be more than **minor**.

Interbay Smith Cove

Incompatible use conflicts would be about the same as today in this area. Maritime and shoreline areas such as Terminal 91 and its upland would continue to be well-buffered from encroaching uses, and rail yards and facilities would not change substantially. Terminal 91 uplands and the Armory site would develop in part or in whole with industrial uses such as distribution space flex, or light industrial space. The effects of such development would not increase incompatibility with adjacent retail and office uses over existing conditions. The biggest land use changes would occur in areas near the future rail station in the Elliott Avenue corridor where construction of light rail infrastructure and infill development under IC and IG zoning would be expected and could include substantial offices. This area already contains few extensive heavy industrial uses, and few new conflicts exceeding today's level are expected. If parcels adjacent to BNSF tracks develop

with non-industrial uses some minor impact due to noise and vibration as experienced by future tenants could result but because prohibitions on new residential development would limit nonindustrial activity to commercial uses which are less sensitive to noise and vibration than residential uses, the impact would not be more than **minor**.

SODO/Stadium

Incompatible use conflicts would increase incrementally throughout greater SODO as current trends towards non-industrial retail and office under existing IG zone regulations result in infill on more sites scattered across the area. Existing heavy industrial land uses described above that are sources of noise, odors and glare would be expected to continue in SODO. (i.e., Republic Services, Port Terminals, SIG, and Argo Rail yards etc.). Proximity of these sources to new non-industrial users would create incrementally greater incompatibility. Large industrial users upland at the center of SODO would have increased difficulty continuing operation due to access constraints as a result of increasing non-industrial office and retail uses.

Maritime and waterfront areas would continue to be well-buffered from encroaching uses in SODO, including Harbor Island, Lower Duwamish Waterway installations and Terminal 5.

Incompatibilities in the stadium area would increase only slightly as more office development in the existing IC zones flanking 1st Avenue materializes. The main source of incompatibility would be exposure of new users/tenants/visitors to heavily trafficked roadways (i.e., SR99) and loud truck traffic that would continue to transit the area. The area contains few extensive heavy industrial uses, and few new conflicts exceeding today's level are expected. If parcels adjacent to the SIG railyard develop with non-industrial uses some minor impact due to noise and vibration as experience by future tenants could result but would not be more than minor.

Overall, in this subarea incompatible use impacts would increase over time but because prohibitions on new residential development would limit non-industrial activity to commercial uses which are less sensitive to noise and vibration than residential uses, the impact and would be **minor**.

Georgetown/South Park

Incompatible use conflicts would increase incrementally in portions of the Georgetown/South Park Subarea. This would be due to current trends towards non-industrial retail and office development under existing IG zone regulations that would result in infill on more sites scattered across the area. Existing heavy industrial land uses described above in existing conditions that are sources of noise, odors and glare would be expected to continue in SODO. (i.e., Argo Rail yards, manufacturers etc.). Proximity of these sources to new non-industrial users would create incrementally greater incompatibility. Large industrial users would have increased difficulty continuing operation due to access constraints as a result of increasing non-industrial office and retail uses.

Maritime and waterfront areas would continue to be well-buffered from encroaching uses in Lower Duwamish Waterway Georgetown.

Incompatible use impacts would increase incrementally over time, particularly in areas proximate to residential uses, but due to the limited amount of housing the impacts and would be **minor**.

Employment Mix

As seen above in **Exhibit 3.8-12**, the overall employment mix would change only slightly. The employment mix would remain over 50% industrial in both MICs and the study area. Employment projections estimate an addition of 23,500 total jobs, of which about 11,900 would be industrial and 11,600 would be non-industrial. Alternative 1 would result in no more than a **minor** impact to employment mix.

Land Use Transitions

Under Alternative 1 land use transitions are expected to be similar to how they are today. Transition areas are industrial areas with uses that are less intense than core/heavy industrial areas and adjoin areas that are planned for non-industrial areas such as residential neighborhoods or mixed-use commercial areas. Abrupt transitions occur when non-industrial adjacencies are impacted by neighboring high intensity/high impact industrial activities that result in excessive noise, air pollution, noxious odor, or impacts resulting from height bulk and scale of taller buildings in the IC zone where it abuts nonindustrial areas.

Much of Seattle's industrial land has well defined edges (I-5, rail corridors, green belts, waterways) separating industrial areas from non-industrial uses eliminating the potential for encroachment of high intensity/high-impact uses adjacent on residential areas. However, some industrial areas directly abut residential and mixed-use commercial areas. In many cases, these areas are zoned IB which is intended to create a transition from industrial areas through a more limited set of permitted industrial uses and development standards such as setbacks, additional height limits, and landscaping requirements. In some places, the IB zone is applied with a shallow depth, limiting its effectiveness as a transition, and limiting development potential. Similarly, development in IC zones in some areas provides effective transitions because they are frequently developed with office buildings that can provide a transition from core industrial areas to nonresidential areas. In some places where the IC zone abuts nonindustrial areas potential impacts related to height, bulk, scale, and aesthetics exist however, development standards intended to reduce these impacts on adjacent residential zones reduce these potential impacts to a level of insignificance.

Ballard

Industrial zones in the Ballard Subarea directly abut residential zones and mixed-use commercial areas resulting in long-term unavoidable impacts. North of Leary Way, the eastern edge of Ballard land zoned IB provides a transition from core industrial areas, developed with a

mix of legally non-conforming residential, warehouse, industrial, storage, and retail uses. On the northern edge of the central portion of the BINMIC, east and west of 14th Avenue W, the transition is abrupt with significant industrial activity adjacent to mixed-use and residential commercial areas. This development is a mix of light industrial, warehouse, parking, and non-conforming residential uses. This land is currently zoned IG2 and while there are currently no high intensity/high impact uses, current zoning would allow such uses over the next 20 years. In northwest Ballard, an abrupt transition exists at the northwest corner of 24th Avenue NW and NW Market Street where maritime activity directly abuts mixed-use zoning as part of the Ballard Hub Urban Village. This area is an important location for maritime industries, including ship servicing, seafood processing, and other activity dependent on the critical maritime infrastructure that is Salmon Bay. An adequate transition exists existing moving west from the mixed-use zoning. The Nordic Museum and other property in the IC zoning on the south side of Market Street and IB zoning on the north side of Market Street provide a strong transition from the core industrial area. Continued development in industrial areas is expected to be consistent with the existing development pattern and not result in height, bulk, scale, or aesthetic impacts.

The adjacency of IG zoned land and the range of existing and permitted uses in the Ballard Subarea results in a **moderate** impact.

Interbay Dravus and Interbay Smith Cove

The majority of Interbay is defined by hard edges, but long-term unavoidable impacts occur in the area west of the BNSF rail corridor (which in some places directly abuts residential areas) and in the Interbay Dravus Subarea (where industrial uses directly abut multifamily residential development). Operations of the BNSF rail corridor and switching yard results in noise and exhaust from train assembly, and idling locomotives are a high intensity/high impact use. The Interbay Dravus Subarea is a compact node and although the lack of transition will continue in the No Action Alternative, it is confined to a small area and somewhat mitigated by the presence of commercial uses fronting on both sides of Dravus Street. This subarea includes conditions where IG1 zoning directly abuts a mixed-use commercial area substantially developed with housing. The industrial part of this subarea is developed primarily with 1 and 2 story buildings with outdoor storage or parking which is typical of this zone classification. This is different than the type of development expected in IC zoning with 3-4 story, bulkier office buildings that can result in height, bulk, scale, and aesthetic impacts to adjacent nonindustrial areas. Continued development in these industrial areas is expected to be consistent with the existing development pattern and not result in height, bulk, scale, or aesthetic impacts.

The adjacency of the BNSF rail corridor to residential areas is a **moderate** impact. The lack of transition in the Interbay Dravus Subarea results in a **minor** impact.

SODO/Stadium

The majority of the SODO portion of the Subarea is defined by hard edges including I-5 and the parallel green belt to the east and steep topography and a green belt adjacent to W Marginal

Way. However, potential impacts could occur over 20 years on land in Delridge adjacent to the Nucor Steel and on currently vacant land adjacent to Harbor Blvd SW. The Nucor Steel mill is a heavy manufacturing facility adjacent to residential development but transitions in the form of Longfellow Creek Green Space and IB zoning developed with a mix of office and mini storage that reduces the scale of this ongoing moderate impact. North of Delridge, Harbor Avenue SW separates the SODO portion of the MIC from mixed residential and commercial development to the west. Most of the industrial land adjacent to Harbor Avenue SW is vacant, used as outdoor storage, or developed as park land and currently provides a transition from adjacent industrial areas including Terminal 5. It is possible over the next 20 years that industrial development could occur on vacant land in the IG2 zone that would introduce high impact/high intensity uses thereby eroding the existing transition conditions and resulting in a **moderate** impact.

To the north, the Stadium district and its focus on spectator sports facilities provides a transition to the Pioneer Square Neighborhood. While the IC zoning to the northeast end of the Greater Duwamish MIC adjacent to the CID is currently developed with a mix of office, transportation, and industrial uses, it is likely in the next 20 years there will be continued office development in the IC zoned parcels in this area creating a stronger transition from core industrial areas to the CID. The IC zoned parcels in this area allow for substantially larger buildings than are found in existing industrial development (up to 175 feet), however, development standards for these IC zones intended to regulate bulk, scale, and aesthetic impacts mean future development on these sites will reduce impacts to insignificant levels.

Adjacent to Nucor Steel and Harbor Blvd the transition impact is **moderate**. Adjacent to Pioneer Square and CID the impact is **minor**.

Georgetown/South Park

Both the Georgetown and South Park neighborhoods abut industrial areas. A transitional strip of IB zoning separates the residential areas from core industrial areas resulting in a **moderate** land use impact. Land uses in the transition area include vehicle storage (WSDOT), a community college just east of Georgetown, and a mix of industrial uses north of South Park. The IB areas represent a shallow transition from core industrial areas and this pattern is expected to continue under the No Action Alternative. Continued development in industrial areas is expected to be consistent with the existing development pattern and not result in height, bulk, scale, or aesthetic impacts.

Impacts from a lack of transition in both areas are **minor**.

Other Industrial Zoned Lands

Industrial land outside the MICs include land in Fremont, the north shore of Lake union, the Southeast shore of Lake Union and the area bound by I-90, Rannier Avenue S, and S Dearborn.

- Industrial land in Fremont is zoned with a mix of IB, IC, and IG2 zoning. On the south side of N 36th Street, land is zoned IB and is developed with a mix of commercial uses. An area south of the strip of IB zoned land and fronting N 36th Street is zoned IG2, with land further

south adjacent to the ship canal zoned IC. The area currently zoned IG2 is developed with a mix of industrial, commercial, warehouse, and legally nonconforming residential uses. The relative size of the IG2 land compared to core industrial areas and the surrounding zones means it is unlikely to result in development of high impact/high intensity uses that will encroach on or abut non-industrial areas. Continued development in industrial areas is expected to be consistent with the existing development pattern and not result in height, bulk, scale, or aesthetic impacts. The impact due to lack of transition in this area is low.

- Industrial land on the shoreline south of N Northlake Way is zoned IB. This land falls substantially within the shoreline area and is subject to provisions of the Shoreline Master Program. This area is developed with a mix of office, marina, marine terminal, warehouse, public safety, and park uses. There is little to no potential for high intensity/high impact uses to encroach on nonresidential areas. Development regulations including height limits, FAR limits, and view corridor requirements of the Shoreline Master Program means impacts resulting from height, bulk, scale, and aesthetics are not anticipated. North of N Northlake Way, land contiguous to the IB zoned land to the south at Stone Way N is zoned IC and is developed with a range of office and retail uses. The industrial area defined by N Northlake Way, I-90, and N Pacific Street is zoned IC. This area is currently developed with a mix of warehouse, office, light industrial, and parking uses. There is limited potential for high intensity/high impact uses to encroach on nonindustrial areas in all of these areas. Although IC zoning allows for development 3 to 4 story office buildings with greater bulk and scale than is typical of other industrial zones, development regulations for development projects in the IC zone that abut residential areas mean impacts related to height, bulk, scale, and aesthetics are not anticipated.
- The industrial area near I-90 is currently zoned IC and is developed with a mix of recreational, office, and warehouse uses. Because of the compact nature of this area, the hard edge of I-90 to the west and south, and significant arterials to the east and north that separate this area from nonindustrial areas and the IC zoning of this land, there is no potential for high intensity/high impact uses to encroach on nonresidential areas or for impacts resulting from incompatible height, bulk, scale, or aesthetics.
- The industrial area on the shoreline of southeast Lake Union is zoned with a mix of IG1 and IC. The IG1 portion of this area is currently developed with a seafood processing company and a drydock facility and falls substantially within the shoreline zone. Development regulations including height limits, FAR limits, and view corridor requirements of the Shoreline Master Program means impacts resulting from height, bulk, scale, and aesthetics are not anticipated. IC land up shore from the IG1 land is developed with R&D facilities. There is no potential for impacts resulting from encroachment of high intensity/high impact uses at this location because the IG1 land is shoreline and water and is subject to the provisions of the SMP which would preclude such impactful uses. The IC area is developed with R&D and office uses which do not encroach on non-industrial areas.

Impacts resulting from inadequate transition for industrial to nonindustrial areas outside of the MICs is **minor**.

Impacts of Alternative 2

Likely Changes Over the 20-year Planning Horizon

Land Use Planning & Policy. Under Alternative 2—Future of Industry Limited, the planning and policy context would be changed to enact the Comprehensive Plan policy amendments described above in **Local Policy Framework**. The City would also adopt updates to the currently adopted Sub Area Plans for the Greater Duwamish MIC and BINMIC which include the land use concepts identified in this proposal.

Future Land Use. Under Alternative 2 the future Land Use Map would not change. Boundaries of the BINMIC and Greater Duwamish MIC would not be altered, as no land is removed from MICs under Alternative 2. "Industrial Areas" designation on the FLUM outside of MICs would not be changed. Industrial zoned land within the FLUM designated urban villages would remain in that designation.

Zoning. Under Alternative 2 zoning would be changed to apply the proposed new Maritime, Manufacturing and Logistics (MML), Industry and Innovation (II), and Urban Industrial (UI) zones, instead of the existing zones. The Seattle Municipal Code would be amended to add the development standards in the MML, II and UI zones as described in **Chapter 2**, including retention of a Stadium Area Overlay District. The location of the zones in Alternative 2 is mapped as shown in **Chapter 2** and **Appendix C**.

Alternative 2 applies the proposed new industrial zones with relatively less Industry and Innovation and Urban Industrial than the other two Action Alternatives. Under Alternative 2:

- The maritime, manufacturing and logistics zones would cover 89% of industrial lands.
- A mix of Industry and Innovation and Urban Industrial Zones would cover 11% of the study area including an estimated ¼ mile from light rail stations.
- There would be no expansion of housing allowances in the UI zone

Land Use. Under Alternative 2, land use would change over the planning period according to current trends and as a result of the proposed zoning changes. Some notable expected changes include.

- **Decreased rate of conversion to stand-alone office and retail uses in MML zoned areas.** The new MML zone would have stricter size of use and FAR limits for stand-alone office and retail uses. As a result, there would be fewer conversions to stand-alone office and retail than past trends and under Alternative 1.
- **Continued distribution and warehouse facilities.** Strong demand for new warehouse and distribution space is expected to continue, resulting in the addition of new distribution and warehouse facilities in MML zoned areas.
- **Maintenance of maritime and industrial base.** Most long term maritime and logistics uses would continue on waterfront and industrial lands near infrastructure, especially in the Greater Duwamish MIC. New Comprehensive Plan policies limiting the removal of land from

MICs will provide existing industrial land uses with the kind of long-term predictability that will increase onsite reinvestment for continued industrial use could be expected at a greater rate than under Alternative 1.

- **Denser employment including new industrial space near future light rail station in the limited II zoned areas.** The proposed II zone regulations combined with expected strong market interest due to increased access provided by light rail stations is likely to result in development with a high density of employment in ICT and Office development sectors in these areas. However, the mapped locations of the II zone are limited in the alternative. New development in the II zoned areas would include new light industrial space at ground level. Much higher levels of employment, and general activity by employees and visitors is expected. Associated frontage improvements and infrastructure upgrades would also be expected with the changed character and activity pattern in these nodes.
- **Increased development of mixed-use, flex, and light industrial uses in UI zoned areas.** The proposed UI zone regulations combined with expected strong market interest due to proximity to population centers will lead to incremental addition of new buildings with light industry, office, and flex space in areas at the edges of MICs near urban villages. Increased ancillary uses for breweries, retail showrooms and similar will incrementally increase use of the area by non-industrial populations. Frontage improvements, infrastructure upgrades, and increased landscape would be expected. The physical character in these edge areas would become more urban in nature with more buildings built to lot lines.
- **Armory Site Redevelopment.** Under Alternative 2 the Armory site would be developed with light industrial and flex space of a relatively low-density nature or remain vacant after relocation of the Army National Guard to North Bend, WA.
- **Little or no new housing.** Only an estimated 80 new homes would be added in caretakers' quarters and artist/studios.

Employment Mix. Under Alternative 2, employment is projected to grow substantially more than under Alternative 1 No Action. A total of 34,400 additional jobs are projected for the study area, an increase of 35%. This would represent about 20% of the projected citywide employment growth over the 20-year planning horizon. The mix of industrial employment would increase by 4.4% points compared to the No Action Alternative, up to 59.7%. Both MICs would continue to contain much more than the minimum number of industrial jobs required to meet PSRC's regional criteria for MIC designation (20,000). The percentage of industrial employment would remain at roughly 58% or greater in every subarea under the alternative. See **Exhibit 3.8-13**.

Exhibit 3.8-13 Employment by Subarea, Current Conditions and Alternative 2

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

Source: City of Seattle, 2021.

Consistency with Plans & Policies

Under Alternative 2, conditions in both the Greater Duwamish MIC and the BINMIC would still meet PSRC's regional criteria for designation as an Employment Center MIC.

- 75% land zoned for core industrial uses: Under Alternative 2, the new zones (MML, II, and UI) would be considered core industrial zones satisfying the PSRC criteria, because development under the standards in all three zones would include industrial development. Therefore, 100% of the land in the BINMIC and Greater Duwamish MIC would be zoned for core industrial purposes.
- Employment would remain over 50% industrial for the MICs as a whole and for all subareas.
- Employment would remain far above 20,000 jobs.

Land use changes over the time horizon would be consistent with Comprehensive Plan goals and policies. Updates to goals and policies are an integrated part of Alternative 2 and the new zones and development that would occur in them would be crafted to advance those policies.

Land use patterns would be consistent with the plan's goals and policies concerning protections for industrial and maritime uses in core areas, such as land use goal 10, and policies 10.2, 10.3 and 10.4. Future development in the MML zone would afford stronger protections (compared to existing IG zones) for industrial uses such as lower maximum size of use limits and FAR limits for non-industrial uses and prohibition of mini storage uses. Limiting removal of land from MICs to major plan updates would also provide stronger protection in accord with these policies.

Land use changes expected over time under the new II and UI zones would be consistent with the plan's amended goals and policies including LUG11and LUG12. New or amended policies including 10.6 address integration of land use with high-capacity transit. Development in the II zone would be consistent with new policies supporting dense employment and emerging industries near transit, including policies 10.7 and 10.19. New or amended plan policies would promote transitions at edges of MICs that integrate with nearby urban villages including 10.7,

and 10.22-24. Development in the II zone would be built with reduced setback requirements, large ancillary size of use limits, and urban landscaping standards that would cause new buildings to augment transitions in line with the policy intent.

However, an incremental degree of inconsistency could arise with respect to select policies under Alternative 2, because there is some increased potential for denser development in the II and UI zones to adversely affect traditional heavy industrial uses. If robust development under the new II and UI zones occurs, there could be some incremental inconsistency with policies 10.12 (concerning limiting density in MICs), policy 10.13 (concerning limiting landscaping requirements in industrial areas), and 10.18 (concerning avoiding attracting large numbers of visitors), and Container Port Element CP3 (concerning discouraging retail and residential uses).

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

Overall consistency with regional plans would be maintained, and consistency with the City's Comprehensive Plan goals and policies would increase compared to Alternative 1. Although there is potential for slight inconsistency with a few policies, land uses under Alternative 2 would be strongly consistent with most policies and impacts related to consistency are **minor**.

Land Use Compatibility

Ballard

Most land in the Ballard uplands in the 14th Avenue corridor north of NW Leary would be placed in the MML zone. Over time some use conflicts would likely be reduced here because stricter maximum size of use limits for non-industrial would reduce pressure to convert land to stand-alone retail and offices, compared to Alterative 1. A stronger and more consistent industrial use pattern would evolve over time, and longstanding industrial operations would be afforded relative ease of operation concerning truck movements, and insulation from complaints about noises and odors. There is some potential for use conflict between an increasingly consistent industrial use pattern south of NW 53rd Street and increased volumes of passersby through the area to a transit station. See also **Section 3.10 Transportation**.

Dense employment in multi-story buildings would likely be added in the two blocks of the II zone between NW 53rd and NW 54th Street near a potential future light rail station, and II zoned areas in Fremont that already contain a high concentration of dense employment. No major use conflict would be expected in these locations.

Due to conversion to the MML zone for lands abutting the shoreline, incompatible use pressures in areas of Ballard south of Leary Way would be lessened over time, compared to Alternative 1. Existing use incompatibilities in the BINMIC due to proximities between retail and

office land uses and industrial and maritime activity related to noise, congestion etc., would continue near existing levels, but are not expected to increase markedly.

Increased infill development with light industrial uses and brewers/makers with large ancillary spaces is expected in areas at the edges of Ballard, and along NW 36th Street in Fremont. New zone standards would allow smaller parcels to accommodate new structures. Uses that appeal to visitors from nearby urban villages such as showrooms and tasting rooms are expected to occupy new structures. Resulting land use patterns and expected times of day for activity would be consistent with the adjacent areas outside of the study area. There is some potential for increased volumes of visitors to create minor use conflicts with remaining heavy industrial uses in MML zones at the interior.

Overall impacts resulting from land use conflicts in Ballard would be **minor** under Alternative 2**.**

Interbay Dravus

Under Alternative 2, all the shoreline and adjacent lands including Fisherman's Terminal, W Commodore Way lands, and the BNSF railyard would be placed in the MML zone. Stricter maximum size of use limits would reduce pressures for conversion to non-industrial uses in these areas, and over time a stronger and more consistent industrial use pattern would emerge compared to Alternative 1. Use conflicts between operation of maritime and heavy industry related to noise, local truck access and similar would be reduced compared to Alternative 1.

Land north of Dravus Street along Thorndyke Avenue W that would be in the UI zone would likely receive incremental infill development with light industrial uses, brewers/makers with large ancillary spaces, including on some smaller parcels. The uses would appeal to visitors from nearby residential areas and by those using light rail transit. Some land would likely be used for light rail construction and operation. These changes would cause an overall transition of the 14-acre area to an urban mixed-use pattern (albeit without housing). Impact of this transition would be minor, since no very heavy or largescale industrial uses are located in the small area, and the area is contained by defined edges of the rail track.

Overall use impacts resulting compatible land uses in the Interbay Dravus Subarea would be **minor** under Alternative 2**.**

Interbay Smith Cove

Under Alternative 2, land use patterns in the Interbay Smith Cove Subarea would not change markedly from current conditions, and use incompatibilities are not expected to increase in severity compared to Alternative 1. The W Armory Way corridor has been developed with a mix of retail ministorage uses that are expected to remain in place, and since few adjacent heavy industrial activities remain, there is not a high degree of use conflict at present.

The Armory site would be in the MML zone and would likely be developed with light industrial and flex space of a relatively low-density nature including activities such as distribution and warehousing. Such uses are not expected to conflict with the surrounding context due in part

to the large site that can contain activities and provide buffering at edges. Some minor use incompatibilities could arise due to increased volumes of truck entering and exiting the large site via routes including W Armory Way which also provides access to the non-industrial retail uses.

Marine Terminals and T91 uplands would be placed in the MML zone. Marine activities, and industrial use similar to existing conditions will continue on those lands and would not create additional land use conflicts.

Areas zoned Industry and Innovation not already developed with offices in the Elliott / 15th Avenue W corridor would be likely to receive some additional dense employment development in multi-story buildings. The use pattern by daytime employees would be similar to adjacent uses such as the Expedia campus.

Overall use compatible impacts in the Interbay Dravus Subarea would be **minor** under Alternative 2**.**

SODO/Stadium

Under Alternative 2, all the shoreline and adjacent lands including Port Terminals, and expansive stretches of land currently zoned IG would be placed in the MML zone. Stricter maximum size of use limits would reduce pressures for conversion to non-industrial uses in these areas, and over time a stronger and more consistent industrial use pattern would emerge compared to Alternative 1. In MML zoned areas land use conflicts between operation of maritime and heavy industry related to noise, local truck access and similar would be reduced compared to Alternative 1.

Under Alternative 2 limited areas of the Industry and Innovation zone are added in a close ¼ walking areas to the SODO/Lander Street station, on the WOSCA site and on land north of I-90, all of which would be likely to receive some additional dense employment development in multi-story buildings, with light industrial uses integrated at ground level.

Minor new use conflicts would be likely in the area around the SODO/Lander Street light rail station, as a significantly higher volume of daytime workers, unrelated to industrial operations would be present. Minor conflicts could include new exposures of pedestrians and workers using outside spaces to loud truck traffic and industrial equipment and to odors from industrial operation such as the Republic Transfer station. Presence of workers could increase difficulty of fluid freight movement including difficulty with operation of loading docks and site access. However, since the geographic area zoned II is tightly limited to the area around the station, impacts would be minor.

The II zoned area between 4th Avenue S and I-90, the Rainier Avenue S corridor, and the WOSCA site would be likely to receive additional dense employment development in multi-story buildings and an increased volume of daytime workers. However, the use pattern by daytime employees would be like the adjacent existing uses such as Union Station, Home Plate Center, and other development in the permitting process. New development and uses are expected to

be compatible with adjacent Chinatown/ID and Little Saigon neighborhoods. Ground floors in II developments would include new light industrial space, and there is a demand for such space in Chinatown/ID and Little Saigon by distributors of goods including produce and restaurant supply. Employees of office, R&D, and ICT uses would likely provide increased customer base for restaurant and service uses in Chinatown/ID.

Land in the stadium area in the UI zone would likely receive incremental infill development with light industrial uses, brewers/makers with large ancillary spaces, including on some smaller parcels. Some additional lodging uses would be expected due to the change to permit lodging in the Stadium Area Overlay District (STAOD). Continued addition of large-sized office and retail uses are expected in the STAOD. The uses would appeal to visitors from nearby residential areas and patrons of stadium events. These changes would cause an overall transition of the area fronting 1st Avenue to an urban mixed-use pattern (albeit without housing). Some minor impacts could result due to an incremental increase in exposure of pedestrian activity near trucks transiting on 1st Avenue and accessing I-90 and SR99 freeways.

Overall use compatibility impacts in the SODO/Stadium Subarea would be **minor** under Alternative 2**.**

Georgetown/South Park

Under Alternative 2, all riverfront lands including Port Terminals, marine operations, and expansive stretches of land currently zoned IG would be placed in the MML zone. Stricter maximum size of use limits would reduce pressures for conversion to non-industrial uses in these areas, and over time a stronger and more consistent industrial use pattern would emerge compared to Alternative 1. In MML zoned areas use conflicts within the MIC between operation of maritime and heavy industry related to noise, local truck access and similar would be reduced compared to Alternative 1.

Increased infill development with light industrial uses, brewers/makers, and small manufacturers with large ancillary spaces is expected in areas at the edges of South Park Urban Village and the Georgetown residential areas. New zone standards would allow smaller parcels to accommodate new structures. Uses that appeal to visitors from nearby urban villages such as showrooms, tasting rooms and similar are expected to occupy new structures. Resulting use patterns, and times of day for activity, would become more consistent with the adjacent areas outside of the study area in South Park. There is some potential for increased volumes of visitors to create minor use conflicts with heavy industrial uses in MML zones at the interior.

Existing use conflicts would persist in the triangular area of Georgetown bounded by Corson Avenue S, Carleton Avenue S, and I-5 where there are a high concentration of retail uses on Airport Way S. A primarily industrial character would remain and increase in the areas in the western portion of the triangle due to stricter limits on non-industrial uses in the MML zone. This would solidify a break in the continuity between the two residential portions of Georgetown neighborhood that exists today, which is a **minor** adverse land use impact.

Employment Mix

As seen above in **Exhibit 3.8-13** the overall employment mix would change incrementally. The mix of industrial employment would increase by 4.4% points compared to No Action, up to 59.7%. The percentage of industrial employment would remain at roughly 58% or greater in every subarea under the alternative. Although there would be an increase in non-industrial employment in office and ICT sectors, the increase in industrial employment due to stronger protections in the MML zones, inclusion of new light industrial space in II zone development, and industrial redevelopment of the Armory site would result in bigger increases in industrial employment than Alternative 1. No adverse impact is expected.

Land Use Transitions

Land use transitions under Alternative 2 remain much as they are under Alternative 1—No Action alternative. Most IB zoning is replaced with the new UI zone to create a scale of development and uses compatible with nearby non-residential areas and provide a transition from high intensity/high impact industrial uses in core industrial areas. Development in this zone would be higher density than the IB zone with a finer grained development pattern consisting of makers spaces, light industrial uses. In addition to less intense industrial activity, these areas will generate pedestrian activity by including opportunities for more ancillary retail and showroom space. Because Alternative 2 applies the UI zone in the same pattern as the IB zone in the No Action Alternative, the narrow application of this zone in some areas limits the degree to which these areas developed as intended. However, it is expected that the UI zone will allow for an increased amount of infill development on small sites due to decreased setbacks compared to the IB zone.

Alternative 2 also replaces limited portions of land in the current IC zone classification with the core industrial zone, the MML zone, in locations that abut nonindustrial areas. This change could result in high impact/high intensity uses adjacent to nonindustrial areas resulting in an incremental impact due to lack of transition.

Ballard

In northeast Ballard the existing IB zoning is replaced with UI zoning and provides a narrow transition between the core industrial area to the west and non-industrial areas to the east and north. In the Central part of Ballard introduction of the II zone in the area of 14th Avenue NW and NW 54th Street could develop with a mix of industrial and commercial uses providing a narrow transition from the core industrial area. Because the UI zone will larger buildings than is typical of industrial areas, there is potential for impacts related to height, bulk, scale, and aesthetics where it abuts residential areas in northeast Ballard. In the western portion of the Ballard Subarea, expansion of the core industrial zone into areas currently zoned IC could result in introduction of high intensity/high impact uses adjacent to non-residential uses in the Ballard Hub Urban Village. Due to the limited size of this condition, this is a moderate impact.

Interbay

Like Alternative 1—No Action, most of this subarea is defined by hard edges except for the node anchored by W Dravus Street and the area adjacent to the BNSF rail corridor. A stronger transition occurs in the Dravus area by applying the UI zone where land is currently in a core industrial zone. This will result in finer grained development of light industrial and makers spaces and anticipation of increased pedestrian activity that provides better compatibility with the adjacent residential development. The nature of the UI zone of encouraging pedestrian activity, and structures of a similar bulk and scale as the adjacent mixed-use zoning means there will be minimal impacts related to height bulk and scale. The presence of residential uses adjacent to the BNSF rail corridor will continue to result in long-term unavoidable impacts. Adjacent to the BNSF rail corridor the impact is moderate. In Dravus the impact is low.

SODO/Stadium

The impacts due to a lack of transition from core industrial areas to nonindustrial areas for Alternative 2 are similar to Alternative 1—No Action. The IB zone in Alternative 1—No Action adjacent to the Nucor Steel plant will be rezoned to UI and the area along Harbor Boulevard would change from existing IG2 and limited IB zoning to the MML zone with a similar range of permitted uses and scale of development as existing zoning. Likewise, to the north the areas adjacent to Pioneer Square and the CID would see zoning changes from IC zoning to a mix of UI and II zoning with a similar reduction of impacts overtime as redevelopment occurs. The potential impact from encroaching or abutting high intensity/high impact uses or from impacts related to heigh, bulk, scale, and aesthetics inn nonresidential areas is low.

Georgetown/South Park

The impacts in the subarea are expected to be similar to Alternative 1—No Action. Alternative 2 mirrors the existing zoning pattern by changing areas adjacent to Georgetown and South Park from IB to UI. Because the UI zone will allow for taller structures with ancillary housing than is allowed in the current IB zone there is potential for impacts related to height, bulk, scale, and aesthetics. However, due to the shallow depth of this zoning in areas where it abuts nonresidential areas the potential impact from encroaching or abutting high intensity/high impact uses on nonresidential areas or the potential for impacts associated with height, bulk, scale, and aesthetics is low.

Other Industrial Zoned Lands

In Fremont the impacts from lack of transition are the same as Alternative 1—No Action. Alternative 2 proposes to leave the land use pattern unchanged with UI replacing the IB zone, MML replacing the IG2 zone, and II replacing the IC zone. On the north shore of lake union, Alternative 2 proposes changing the IB zone to the more intensive MML zone but the narrowness of the strip and development regulations of the SMP preclude the potential for development of high intensity/high impact uses in this area. IC zoning is proposed to be changed to II and will

result in the same level of impact as Alternative 1—No Action. The southeast Lake Union industrial area will continue to not have impacts resulting from inadequate transition from core uses. Alternative 2 proposes changing the IG1 zoning to MML and the IC zoning to II. The potential impact from encroaching or abutting high intensity/high impact uses or impacts related to height, bulk, scale, and aesthetics on nonresidential areas is low.

Impacts of Alternative 3

Likely Changes Over the 20-year Planning Horizon

Land Use Planning & Policy. Under Alternative 3—Future of Industry Targeted, the planning and policy context would be changed to enact the Comprehensive Plan policy amendments described above in **Local Policy Framework**. The City would also adopt updates to the currently adopted Sub Area Plans for the Greater Duwamish MIC and BINMIC which include the land use concepts identified in this proposal.

Future Land Use. Under Alternative 3 the Future Land Use Map would be amended slightly. Boundaries of the Greater Duwamish MIC would be altered to remove focused land near Georgetown and South Park from the MIC designation, as indicated on the map in **Chapter 2** and **Appendix C**. In Georgetown, the triangular area bounded by Corson Avenue S, Carleton Avenue S, and I-5 would be placed into the Commercial/Mixed-Use Areas designation. In South Park select parcels at the northeast and southeast corners of the urban village adjacent to the Duwamish River would be removed from the MIC and placed in the South Park Urban Village. The total area of lands removed from the MIC would be 26 acres. No land would be removed from the BINMIC, and no other Comprehensive Plan FLUM designations would change.

Zoning. Under Alternative 3, zoning would be changed to apply the proposed new MML, II, and UI zones, instead of the existing zones. The Seattle Municipal Code would be amended to add the development standards in the MML, II and UI zones as described in **Chapter 2**, including the retention of a Stadium Transition Area Overlay District The location of the zones in Alternative 3 is mapped as shown in **Chapter 2** and **Appendix C**.

Alternative 3 applies the proposed new industrial zones with a greater share of II and UI zones than Alternative 2. Alternative 3:

- Applies the MML zones covering 86% of industrial lands.
- Applies a mix of II and UI zones in 14% of the study area including an estimated 1/2 mile from light rail stations.
- Expands allowances for limited industry-supportive housing in UI Zone concept with a maximum density of 25/dwelling units per acre.
- Applies mixed-use zoning to the areas of Georgetown and South Park that are removed from the MIC. Neighborhood Commercial with a 75’ height limit or a 55’ height limit could be applied. The higher scale 75’ zone is analyzed for impact analysis purposes. An MHA (M1) suffix are assumed for analysis.

Land Use. Under Alternative 3, land use would change over the planning period according to current trends and as a result of the zoning changes of the alternative. Some notable expected changes include.

- **Decreased rate of conversion to stand-alone office and retail uses in MML zoned areas.** The new MML zone would have stricter size of use and FAR limits for stand-alone office and retail uses and a prohibition on mini storage. As a result, there would be fewer conversions to stand-alone office, retail, and mini storage than past trends and under Alternative 1.
- **Continued additions of distribution and warehouse facilities.** Strong demand for new warehouse and distribution space is expected to continue, resulting in the addition of new distribution and warehouse facilities in MML zoned areas.
- **Maintenance of maritime and industrial base.** Most long standing maritime and logistics uses would continue on waterfront lands and industrial lands near key industrial infrastructure, especially in the Greater Duwamish MIC. Incremental renewal of facilities and buildings for industrial use could be expected at a greater rate than under Alternative 1.
- **Denser employment including new industrial space, near future light rail station in II zoned areas.** The proposed II zone standards combined with expected strong market interest due to increased access provided by light rail stations is likely to result in development with a high density of employment in new buildings for Information Computer Technology and offices in these areas. The development would also include new light industrial space at ground level. Much higher levels of employment, and activity pattern of employees and visitors than Alternative 1—No Action is expected. Associated frontage improvements and infrastructure upgrades would be expected.
- **Increased development of mixed-use, flex, and light industrial uses in UI zoned areas.** The proposed UI zone regulations combined with expected strong market interest due to proximity to population centers will lead to incremental addition of new buildings with light industry, office, and flex space in areas at the edges of MICs near urban villages. Incremental infill development will add density of activity and employment, serving non-industrial populations. Frontage improvements and infrastructure upgrades and increased landscaped areas would be expected. The physical character in these edge areas would become more urban in nature with more buildings built to lot lines.
- **Introduction of some new industry-supportive housing.** Under Alternative 3 about 610 new homes would be added in UI zoned portions of industrial areas due to increased flexibility for caretakers' quarters and artist/studios. With Introduction of more housing changes use in activity patterns are expected, as more 24-hour presence of residents living in areas at the edges of MICs.
- **Additional new housing in areas removed from the Greater Duwamish MIC.** More housing would be added in mixed-use buildings in areas removed from MICs in Georgetown and South Park. This housing would contribute to the expansion of a mixed-use, urban neighborhood character in both locations. The added housing capacity is anticipated at 1,078 units.

- **Armory Site Redevelopment.** Under Alternative 3 the Armory site would be redeveloped with a mix of ICT/office and include new light industrial space at ground level after relocation of the Army National Guard to North Bend, WA. The site would contain a substantial amount of employment density in a new campus-like setting with integrated open space features and new roadway, utilities, and infrastructure, including integration of green infrastructure.

Employment Mix. Under Alternative 3, employment is projected to grow substantially more than under Alternative 1 No Action and more than Alternative 2. A total of 57,400 additional jobs are projected for the study area, an increase of 58%. This would represent 34% of the city's total expected job growth over the 20-year planning horizon. The mix of industrial employment would decrease by 1.7%% points compared to Alternative 1—No Action, down to 53.6%. Both MICs would continue to contain much more than the minimum number of industrial jobs required to meet PSRC's regional criteria for MIC designation (20,000). The percentage of industrial employment would decrease close to the 50% threshold in the Ballard (51.1%) and SODO/Stadium (52.6%) subareas. See **Exhibit 3.8-14**.

Exhibit 3.8-14 Employment by Subarea, Current Conditions and Alternative 3

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

Source: City of Seattle, 2021.

Consistency With Plans & Policies

Impacts regarding consistency with plans and policies under Alternative 3 are the same as described for Alternative 2 with additional impacts related to housing. Alternative 3 includes an estimated additional 610 limited industry supportive housing units in industrial zones. 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. Limitations on who may occupy the housing is expected to mitigate the impact of the introduction of residential use (see discussion in **Mitigation Measures**). the homes are considered residential uses for the purposes of environmental analysis in this section.

Alternative 3 would increase the share of projected employment growth in industrial areas to about 34% of total citywide job growth that the city is planning for during the 20-year planning horizon. This would represent a substantial shift of the city's expected employment growth into industrial areas compared to past trends and the previous 20-year Comprehensive Plan planning horizon. This could have the effect of curtailing recently high rates of job growth in other areas of the City such as Downtown and South Lake Union compared to past comprehensive planning period. Or, if the city receives greater job growth than the 20-year citywide estimate, robust employment growth in the study area would provide the benefit of absorbing some of the city's stronger than expected growth. Since the Comprehensive Plan major update is expected to integrate and plan for the changes contemplated in this EIS the share of employment growth in the study area is not considered an adverse impact.

An incremental increase in conflicts would arise with regional multi-county and PSRC policies that discourage location of new housing in MICs, including (e.g., MPP-Ec-22 and MPP-DP-). Similarly, a degree of inconsistency would arise with the City's Comprehensive Plan policies including LU Policy 10.12 (competition for industrial land by non-industrial uses) and Container Port CP.3 (discouraging retail and residential uses). Overall impacts to consistency with plans and policies due to introduction of housing would result in **moderate** impacts.

Land Use Compatibility

Ballard

Under Alternative 3 land in the Ballard uplands in the 14th Avenue NW corridor north of NW Leary would be placed in the UI zone, and the zone would allow industry supportive housing at a maximum density of 25 dwelling units / acre. A substantial amount of increased infill development with light industrial uses, brewers/makers with large ancillary spaces is expected throughout this area and along NW 36th Street in Fremont. Proximity to light rail would fuel demand. New zone standards would allow small parcels to accommodate new structures. An additional 260 housing units are estimated, and they would typically be located on an upper floor of a 3-4 story mixed-use development. Ground floor uses would appeal to visitors from nearby urban villages such as showrooms, tasting rooms and similar.

These changes would cause an overall and thorough transition of the area to an urban mixed-use pattern with some 24-hour residences interspersed sporadically throughout. Compatibility impacts would increase between remaining longstanding industrial operations and the evolving context due to factors such as impediments to local truck access, and increased exposure of new residents and patrons/visitors to industrial noises and other effects. These compatibility impacts would likely increase pressure on intensive or heavy industrial activities to relocate form the area over time and would rise to the level of moderate. However, use compatibility could also improve to some degree as new investment brings associated streetscape improvements and landscaping that would reduce conflicts between pedestrians and freight movement by increasing amenity features and vegetation that would buffer non-industrial visitors or residents from effects of heavier industrial uses. The resulting use patterns, and

times of day for activity, would become more consistent with the adjacent areas outside of the study area.

Due to conversion to the MML zone for lands abutting the shoreline, incompatible use pressures in areas of Ballard south of Leary Way would be lessened over time, compared to Alternative 1. Existing land use incompatibilities here would continue near existing levels and would be the same as described above for Alternative 2.

Dense employment in multi-story buildings would likely be added in the two blocks of the II in Fremont that already contain a high concentration of dense employment. Similar to Alternative 2, No major land use conflict would be expected in these locations.

Overall use compatibility impacts in Ballard would be **moderate** under Alternative 3**.**

Interbay Dravus

Under Alternative 3, all of the shoreline and adjacent lands including Fisherman's Terminal, W Commodore Way lands, and the BNSF railyard would be placed in the MML zone. Use land use conflicts in industrial areas would be the same as described above under Alternative 2 and reduced compared to Alternative 1—No Action.

Land north of Dravus Street along Thorndyke Avenue W that would be in the UI zone as in Alternative 2, however in Alternative 3 the zone would allow for supportive housing at a maximum density of 25 dwelling units / acre. An additional 75 housing units are estimated, and they would typically be located on an upper floor of a 3-4 story mixed-use development. Similar to Alternative 2, the areas would likely receive incremental infill development with light industrial uses, brewers/makers with large ancillary spaces, including on some smaller parcels. Some land would likely be used for light rail construction. These changes would cause an overall transition of the area to an urban mixed-use pattern with housing units sporadically introduced throughout. However, no very heavy or largescale industrial uses are in the small area, and the area is contained by defined edges of the rail track and 15th Avenue W.

The limited size of land in this node and the relatively small number of projected homes are factors that keep overall use compatible impacts in the Interbay Dravus Subarea to a degree of **minor** under Alternative 3**.**

Interbay Smith Cove

Under Alternative 3 the Armory site would be in the II zone and would likely be developed with a significant amount of dense employment in multistory structures, including some towers, with dedicated space for ground floor light industry. Development would be coordinated through master planning to create a campus like setting with interconnected circulation, open spaces, and infrastructure. Since development would be coordinated, light industry would be integrated such that potential use conflict are minimized with respect to factors such as noise, access, glare, and odors. Such redevelopment would contribute to a strong agglomeration of daytime employment uses in conjunction with the existing Expedia campus and offices in the

Elliott Way corridor. The resulting use pattern would be largely compatible with surrounding context towards the Queen Anne, Uptown urban villages, and the W Armory Way corridor that has already been converted to include a prevalence of retail uses. There is some potential for land use incompatibility at the west edge of the Armory site abutting BNSF rail tracks where vibrations, noise from trains could impact new office uses. Due to integrated design of the Armory site, and findings in other sections of this EIS, such impacts would not be more than minor.

As with Alternative 2, the T91 Marine Terminals and T91 uplands would be placed in the MML zone. Marine activities, and industrial uses similar to existing today would continue on these lands and would not create additional land use conflict.

For other parts of Interbay /Smith Cove, use compatibility aspects of Alternative 3 would be similar to Alternative 2. However, there is increased potential for incompatibility in UI zoned areas in the four blocks along 15th Avenue NW where an estimated 15 housing units would be located. Some land use conflicts resulting from a high volume of truck traffic and presence of 24-hour residences could occur, but the small overall quantity of residences would keep impact to a minor level.

Overall use compatible impacts in the Interbay Smith Cove Subarea would be **minor** under Alternative 3**.**

SODO/Stadium

Under Alternative 3, of the shoreline areas and adjacent lands including Port Terminals, and land currently zoned IG would be placed in the MML zone. Compatibility impacts there would be similar to Alternative 2 and reduced compared to Alternative 1—No Action.

Under Alternative 3 a larger area of the II zone is added in areas approximately ½ mile walking distance to the SODO/Lander station. A higher amount of new land use conflicts would be likely in the area around the SODO/Lander Street light rail station compared to Alternative 2 as more land would potentially generate higher volumes of daytime workers unrelated to industrial operations. Conflicts could include new exposures of pedestrians and workers using outside spaces to loud truck traffic and industrial equipment and to odors from industrial operation such as the Republic Transfer station. Presence of workers could increase difficulty of fluid movement of freight and other industrial vehicles, including difficulty operating loading docks and site access. Under Alternative 3 new dense employment would abut heavy rail tracks on the east and west and would be closer to rail yards. There is a higher potential for new employees or tenants in the area to levy complaints against longstanding heavy industrial activities in the vicinity. Impacts rise to the level of moderate.

Use compatibility impacts for The II zoned area between 4th Avenue S and I-90, and in the Rainier Avenue S corridor, and the WOSCA site would be the same as under Alternative 2, including the described relationships to adjacent Chinatown/ID and Little Saigon neighborhoods.

Under Alternative 3 land in the stadium area in the UI zone could receive an estimated 200 industry-supportive housing units. The area would also receive incremental infill development with light industrial uses, brewers/makers with large ancillary spaces, including on some smaller parcels—similar to Alternative 2. Some additional lodging uses would be expected due to the change to permit lodging in the Stadium Area Overlay District (STAOD). Continued addition of large-sized office and retail uses are expected in the STAOD. The uses would appeal to visitors from nearby residential areas and patrons of stadium events. These changes would cause an overall transition of the area fronting 1st Avenue to an urban mixed-use land use pattern, with some homes interspersed on upper stories of new buildings. The duration of hours and times when visitors unrelated to industry are present would increase in the stadium area outside of event times. This could result in use compatibility impacts due to an incremental increase in exposure of pedestrian activity near trucks transiting 1st Avenue increasing the potential for complaints levied against long standing industrial users. Such impacts would rise to the level of moderate. However, there is also potential for decreases in use conflict as the stadium area transitions to an internally cohesive mixed-use environment with more regular patterns of patronage outside of event times.

Overall use compatibility impacts in the Stadium area would be **moderate** under Alternative 3**.**

Georgetown/South Park

Under Alternative 3, all of the riverfront lands including Port Terminals and marine operations, and expansive stretches of land currently zoned IG would be placed in the MML zone. Use compatibility impacts there would be similar to Alternative 2 and reduced compared to Alternative 1.

Under Alternative 3 (as in Alternative 2) edges of South Park and Georgetown residential areas would be zone UI, and increased infill development with light industrial uses, brewers/makers, and small manufacturers with large ancillary spaces is expected. However, the zone would enable an estimated 60 industry supportive residential units interspersed in these areas. Resulting use patterns, and times of day for activity that would become more consistent with the adjacent areas outside of the study area in South Park. There is some potential for increased volumes of visitors to create minor use conflicts with heavy industrial uses in MML zones, including the potential for increased complaints levied against industrial users. In some locations, residences could directly view industrial layout spaces and storage yards, truck loading docks, and other industrial development.

Under Alternative 3, the triangular area of Georgetown bounded by Corson Avenue S, Carleton Avenue S and I-5 would be removed from the MIC and placed 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. An estimated 1,078 housing units could be added. Land use incompatibility would contribute to pressure for existing industrial businesses to relocate, and by the end of the study time horizon the area would likely transition to mixed-use area similar to an urban village. The new activity pattern would complement the existing use pattern of

restaurants, bars, and retail that fronts Airport Way S and could create a cohesive district. The break in the continuity between the two residential portions of the Georgetown neighborhood that exists today would be removed, which could increase land use compatibility.

Land removed from the MIC at the edges of South Park would be placed in a mixed-use zone. Some of it would likely redevelop with mixed-use structures including housing on upper floors. The new activity patterns could complement existing use pattern of community uses, local businesses and housing that is inside the South Park urban village. Land added to the South Park urban village adjacent to Duwamish Waterway Park would support community goals to add community uses and residents near open space, provide better physical connection of community members to the Duwamish River. Similarly, conversion to mixed residential and commercial use in the area adjacent to Terminal 117 could alleviate the perception of disconnectedness of South Park community to the Duwamish River. Addition of residences and mixed-use structures would, however, create a period of moderate land use conflict between operation of light industrial businesses and new users.

Overall, while there is potential to reduce land use conflicts by creation of more cohesive mixed-use districts in Georgetown and South Park, the process would result in interim increases in **moderate** land use incompatibilities.

Employment Mix

As seen above in **Exhibit 3.8-14**the overall employment under Alternative 3 would increase by 57,000 jobs. The mix of industrial employment would decrease by 1.7% points compared to 53.6% in the No Action Alternative, but total industrial employment would increase by 29,000 jobs. The percentage of industrial employment would remain at roughly 51% or greater in every subarea under the alternative. Although there would be an increase in non-industrial employment in office and ICT sectors, the increase in industrial employment due to stronger protections in the MML zones, inclusion of new light industrial space in II zone development, and industrial redevelopment of the Armory site would result in bigger increases in industrial employment. No adverse impact is expected.

Land Use Transitions

Alternative 3 results in impacts due to a lack of transition similar to Alternative 2 except for Ballard and Georgetown where changes to land currently in the IG1 zone are rezoned as UI or in the case of Georgetown and South Park where small areas are removed from the MIC and placed in a mixed-use commercial zone.

Ballard

The area north of Leary Way and east of 15th Avenue W are removed from a core industrial zone and rezoned UI. This change further reduces the potential for high intensity/high impact uses occurring in proximity to nonindustrial areas. The IC zoned area in northwest Ballard is removed from the IC zone and the core industrial zone is extended to the north Side of Market

Street. Potential impacts related to height, bulk, and scale in Alternative 3 are similar to those in Alternative 2. The IC zoned area in northwest Ballard is removed from the IC zone and the core industrial zone is extended to the north Side of Market Street. This has the potential to introduce high intensity/high impact uses. The relative size of this change means that the impact due to a lack of transition is moderate.

Interbay Dravus and Interbay Smith Cove

Alternative 3 proposes the same land use pattern as Alternative 2. Existing unavoidable impacts occur parallel to the BNSF rail corridor and reduced potential impacts occur in the Dravus area. Impacts adjacent to the BNSF rail corridor are moderate and in Dravus are low.

SODO/Stadium

The land use pattern in SODO/Stadium is the same as Alternative 2 and will result in the same impacts as Alternative 2.

Georgetown/South Park

Alternative 3 proposes the removal of some land from both the Georgetown and South Park neighborhoods from the MIC and rezoned with a mixed-use commercial zone. In Georgetown land zoned IG2 bound by Corson Avenue S to the north, Airport Way S to the east and the commercial and mixed-use commercial zoning to the south is removed from the MIC. This change will not erode the existing transition from the core industrial areas and removes the potential for high impact/high intensity to encroach or abut nonindustrial areas. Potential impact from this proposal is low.

Other Industrial Zoned Lands

The only difference between the proposed changes for land outside the MICs between Alternative 2 and 3 occurs on the northern shoreline of Lake Union. Alternative 3 proposes changing the IB zoning in this area to UI with no potential for high intensity/high impact uses. The potential for impacts with this proposal is low.

Impacts of Alternative 4

Likely Changes Over the 20-year Planning Horizon

Land Use Planning & Policy. Under Alternative 4—Future of Industry Expanded, the planning and policy context would be changed to enact the Comprehensive Plan policy amendments described above in **Local Policy Framework**. The City would also adopt updates to the currently adopted Sub Area Plans for the Greater Duwamish MIC and BINMIC which include the land use concepts identified in this proposal.

Future Land Use. Under Alternative 4, the Future Land Use Map would be amended slightly. Boundaries of the Greater Duwamish MIC would be altered to remove 19 acres near Georgetown and 7 acres adjacent to South Park from the MIC designation, as indicated on the map in **Chapter 2** and **Appendix C**. In Georgetown, the triangular area bounded by Corson Avenue S, Carleton Avenue S, and I-5 would be placed into the Commercial/Mixed-Use Areas designation. In South Park select parcels at the northeast and southeast corners of the urban village adjacent to the Duwamish River would be removed from the MIC and placed in the South Park Urban Village. The total area of lands removed from the MIC would be 26 acres. No land would be removed from the BINMIC, and no other Comprehensive Plan FLUM designations would change.

Zoning. Under Alternative 4, zoning would be changed to apply the proposed new MML, II, and UI zones, instead of the existing zones. The Seattle Municipal Code would be amended to add the development standards in the MML, II and UI zones as described in **Chapter 2**, including retention of a Stadium Transition Area Overlay District. The location of the zones in Alternative 4 is mapped as shown in **Chapter 2**, and **Appendix C**.

Alternative 4 applies the proposed land use concepts with a greater share of Industry and Innovation and Urban Industrial than Alternative 2. This alternative expands limited housing allowances to the greatest degree of any of the alternatives. Alternative 4:

- Applies the MML zone covering 87% of industrial lands.
- Applies a mix of the II and UI zones to 13% of the study area includes an estimated 1/2 mile from light rail stations.
- Expands limited industry-supportive housing in UI zone with a maximum density of 50 Dwelling Units / Acre
- Applies mixed-use zoning to the areas of Georgetown and South Park that are removed from the MIC. Neighborhood Commercial with a 75’ height limit or a 55’ height limit could be applied. The higher scale 75’ zone is analyzed for impact analysis purposes. An MHA (M1) suffix are assumed for analysis.

Alternative 4 includes a maximum size of use limit for indoor sports and recreation uses up to 50,000 sq. ft. in all proposed industrial zones. This would be an increase over the 10,000 sq. ft. size limit of the existing IG zones, but a decrease from the existing limit of 75,000 in IB and IC zones. The SMC also already includes a special allowance for indoor sports and recreation facilities up to 50,000 sq. ft. in the BINMIC subject to limiting locational criteria of SMC 23.50.027.H.

Land Use. Under Alternative 4, land use would change over the planning period according to current trends and as a result of the zoning changes of the alternative. Some notable expected changes include.

- **Decreased rate of conversion to stand-alone office and retail uses in MML zoned areas.** The new MML zone would have stricter size of use and FAR limits for stand-alone office and retail uses and a prohibition on new mini-storage facilities. As a result, there

would be fewer conversions to stand-alone office and retail than past trends and under Alternative 1.

- **Continued additions of distribution and warehouse facilities.** Strong demand for new warehouse and distribution space is expected to continue, resulting in the addition of new distribution and warehouse facilities in MML zoned areas.
- **Maintenance of the maritime and industrial base.** Most long standing maritime and logistics uses would continue on shorelines and industrial lands near industrial infrastructure, especially in the Greater Duwamish MIC. Incremental renewal of facilities and buildings for industrial use could be expected at a greater rate than under Alternative 1.
- **Denser employment including new industrial space, near future light rail station in II zoned areas.** The proposed II zone standards combined with expected strong market interest due to increased access provided by light rail stations is likely to result in development with a high density of employment in new buildings for Information Computer Technology and offices in these areas. The development would also include new light industrial space at ground level. Much higher levels of employment, and activity pattern of by employees and visitors. Associated frontage improvements and infrastructure upgrades would be expected.
- **Increased development of mixed-use, flex and light industrial uses in UI zoned areas.** The proposed UI zone regulations combined with expected strong market interest due to proximity to population centers will lead to the incremental addition of new buildings with light industry, office, and flex space in areas at the edges of MICs near urban villages. Incremental infill development will add density of activity, employment, serving non-industrial populations. Frontage improvements and infrastructure upgrades and increased landscaped areas would be expected. The physical character in these edge areas would become more urban in nature with more buildings built to lot lines.
- **Introduction of some new industry-supportive housing.** Under Alternative 4 about 2,195 new homes would be added in UI zoned portions of industrial areas due to increased flexibility for caretakers' quarters and artist/studios. Introduction of housing changes use patterns, as more 24-hour presence of residents living in areas at the edges of MICs.
- **Additional new housing in areas removed from the Greater Duwamish MIC.** More housing would be added in mixed-use buildings in areas removed from MICs in Georgetown and South Park. This housing would contribute to the expansion of a mixed-use, urban neighborhood character in both locations. The number of new units in the mixed-use areas removed from the MIC equal about 1,078.
- **Armory Site Redevelopment.** Under Alternative 3 the Armory site would be redeveloped with a mix of ICT/office and include new light industrial space at ground level after relocation of the Army National Guard to North Bend, Washington. The site would contain a substantial amount of employment density in a new campus-like setting with integrated open space features and new roadway and utilities infrastructure, including integration of green infrastructure.

Employment Mix. Under Alternative 4, employment is projected to grow substantially more than under Alternative 1 No Action and Alternative 2, and by a similar amount to Alternative 3. A total of 59,200 additional jobs are projected for the study area, an increase of 59%. This would represent 35% of the total projected citywide employment growth over the 20-year planning horizon. The mix of industrial employment would decrease by 2.5% points compared to No Action, down to 52.8%. Both MICs would continue to contain much more than the minimum number of industrial jobs required to meet PSRC's regional criteria for MIC designation (20,000). The percentage of industrial employment would decrease close to the 50% threshold in the Ballard (50.0%) and SODO/Stadium (51.9%) subareas. See **Exhibit 3.8-15**.

Exhibit 3.8-15 Employment by Subarea Current Conditions and Alternative 4

	Current Conditions (2018)			Alternative 4 Future of Industry Limited (2044)		
Subarea	Ind. Emp.	Total Emp.	% Ind.	Ind. Emp.	Total Emp.	% Ind.
Ballard	9,400	17,100	55.0%	16,000	32,000	50.0%
Interbay Dravus	3,400	5,600	60.7%	5,600	10,200	54.9%
Interbay Smith Cove	3,900	6,000	65.0%	6,300	10,700	58.9%
SODO/Stadium	23,000	43,900	52.4%	34,400	66,300	51.9%
South Park/Georgetown	14,900	25,900	57.5%	21,000	38,500	54.5%
Total	54,500	98,500	55.3%	83,300	157,700	52.8%

Source: City of Seattle, 2021.

Consistency With Plans & Policies

Impacts regarding consistency with plans and policies under Alternative 4 are similar in nature to those described under Alternative 3 above. However, the anticipated impact is greater under Alternative 4 because Alternative 4 introduces a greater quantity of industry-supportive housing (an estimated 2,195 limited industry supportive housing units in industrial zones). The housing would be available in caretakers' quarters or artist/maker live/workspaces as described for Alternative 3.

Similar to Alternative 3, Alternative 4 would represent a substantial shift of the city's expected employment growth into industrial areas compared to past trends and the previous 20-year Comprehensive Plan planning horizon, with 35% of expected job growth in the study area. For reasons described above for Alternative 3 however, this would not result in an adverse impact.

An incremental increase in conflicts would arise with regional multi-county and PSRC policies that discourage location of new housing in MICs. Similarly, a degree of inconsistency would arise with the City's Comprehensive Plan policies including LU Policy 10.12 (competition for industrial land by non-industrial uses) and Container Port CP.3 (discouraging retail and

residential uses). Overall impacts to consistency with plans and policies due to introduction of housing would be greater than under Alternative 3 but would result in **moderate** impacts.

Land Use Compatibility

Ballard

Under Alternative 4 land in the Ballard uplands in the 14th Avenue corridor north of NW Leary would be placed in a combination of the II zone and the UI zone. The UI zone would allow a greater density of industry supportive housing at a maximum density of 50 dwelling units / acre.

The blocks zoned II would likely be developed with a significant amount of dense employment in multistory structures, including some towers, with dedicated space for ground floor light industry. Development pressure would be fueled by proximity to light rail. The redevelopment would contribute to an agglomeration of daytime employment uses in conjunction with nearby activity in the Ballard Urban Village. New uses would generate higher volumes of daytime workers unrelated to industrial operations. Conflicts could include new exposures of pedestrians and workers using outdoor spaces to loud truck traffic and industrial equipment and to odors from long-standing industrial operations in the area. Presence of workers could increase difficulty of fluid movement of freight and other industrial vehicles, including difficulty with loading and site access.

Other areas that are north of NW Leary Way NW and in Fremont north of 36th Street would be placed in the UI zone and would likely receive a substantial amount of increased infill development with light industrial uses, brewers/makers with large ancillary spaces. New zone standards would allow small parcels to accommodate new structures. An additional 790 housing units are estimated and would typically be located on several upper floors of a 4-6 story mixed-use development. Ground floor uses would appeal to visitors from nearby urban villages such as showrooms, tasting rooms and similar uses. Residents would be in view of storge and loading areas of industrial business. The likelihood of complaints levied against industrial businesses would increase.

These changes would cause an overall and thorough transition of the area to an urban mixed-use pattern with some 24-hour residences interspersed throughout. Compatibility impacts would likely increase pressure on intensive or heavy industrial activities to relocate form the area over time and would rise to the level of moderate impact. However, light industrial spaces would be integrated at ground level and some area businesses could have access to new light industrial space.

Due to conversion to the MML zone for lands abutting the shoreline, incompatible use pressures in areas of Ballard south of Leary Way could be lessened over time. However, the magnitude of new residences and employees in areas north of Leary Way could exhibit spillover use compatibility pressure on some land south of Leary Way. Therefore, use incompatibilities here would be greater than the other alternatives, and rise to the level of **moderate**.

Dense employment in multi-story buildings would likely be added in the two blocks of the II in Fremont that already contain a high concentration of dense employment. Similar to Alternative 2, no major use conflict would be expected in these locations.

Overall use compatible impacts in Ballard would be the greatest of any of the alternatives and would be **moderate** under Alternative 4**.**

Interbay Dravus

Under Alternative 4, all shoreline and adjacent lands including Fisherman's Terminal, W Commodore Way lands, and the BNSF railyard would be placed in the MML zone. Use conflicts in these areas would be the same as described in alternatives 2 and 3 and reduced compared to Alternative 1—No Action.

Land north of W. Dravus Street along Thorndyke Avenue W would be zoned UI as in alternatives 2 and 3, but in Alternative 4 the zone would allow for industry supportive housing at a maximum density of 50 dwelling units per acre. An additional 175 housing units are estimated, and they would typically be located on an upper floor of a 4-6 story mixed-use development. These changes would cause an overall transition of the area to an urban mixed-use pattern with housing units interspersed, which could lead to the type of land use conflicts described in Alternative 3 where housing is introduced. However, no very heavy or largescale industrial uses are in the small area, and it is contained by defined edges of the rail track and 15th Avenue W.

As with Alternative 3, the limited size of land in this node limits the degree of potential impact. However, the greater density of homes increases likelihood of land use conflict compared to Alternative 3. Therefore, use compatibility impacts in the Interbay Dravus Subarea for Alternative 4 would be **moderate**.

Interbay Smith Cove

Under Alternative 4 the Armory site would be in the II zone, as it is in Alternative 3. The land use compatibility impacts would be the same as described for Alternative 3.

As with alternatives 2 and 3, T91 Marine Terminals and T91 uplands would be placed in the MML zone. Marine activities, and industrial use similar today would continue on those lands and would not create additional use conflict.

No additional housing is expected in the Interbay Smith Cove Subarea under Alternative 4 because of the small application of the UI zone on parcels unlikely to redevelop.

Overall use compatible impacts in Interbay Smith Cove would be **minor** under Alternative 4**.**

SODO/Stadium

Under Alternative 4, all shoreline areas and adjacent lands including Port Terminals, and expansive stretches of land currently zoned IG would be placed in the MML zone. Compatibility

impacts there would be similar to Alternative 2, and 3, and reduced compared to Alternative 1—No Action.

Under Alternative 4 a larger area of the Industry and Innovation zone (than alternative 2 or 3) is added in an expanded ½ mile walking areas to the SODO/Lander station, including blocks along 6th Avenue S north of S Holgate Street. A higher amount of new land use conflict than alternative 2 or 3 would be likely in the area as more land would potentially generate higher volumes of daytime workers unrelated to industrial operations. Land use compatibility conflicts would be similar to those described for Alternative 3 but greater in scale. Land added to the II zone in Alternative 4 would abut heavy rail tracks, freeway ramp infrastructure onramps to I-90, and the King County Metro Central Base exposing future occupants to close contact with regular effects of bus noise and emissions.

Use compatibility impacts for the II zoned area between 4th Avenue S and I-90, in the Rainier Avenue S corridor, and the WOSCA site would be the same as under alternatives 2 and 3 including the described relationships to the adjacent Chinatown/ID and Little Saigon neighborhoods.

Under Alternative 4, land in the stadium area would be zoned UI, and the UI zone would be extended further south along 1st Avenue to Starbucks Center. This would allow the area to receive an estimated 990 industry-supportive housing units. The area would also receive incremental infill development with light industrial uses, brewers/makers with large ancillary spaces, including on some smaller parcels—similar to alternatives 2 and 3. Some additional lodging uses would be expected due to the change to permit lodging in the Stadium Transition Area Overlay District (STAOD). Continued addition of large-sized office and retail uses are expected in the STAOD. These changes, including the higher proportion of housing would cause an overall transition of the area fronting 1st Avenue to an urban mixed-use pattern, with homes interspersed on upper stories of new buildings. Use compatibility conflicts would be similar to those described for Alternative 3, but greater in scale. Such impacts would rise to the level of moderate. However, there is also potential for decreases in land use conflict as the stadium area transitions to a more internally cohesive mixed-use environment with more regular patterns of patronage outside of event times.

Overall use compatibility impacts in the SODO/Stadium area in Alternative 4 would be greater than Alternative 3 but would be **moderate.**

Georgetown/South Park

Under Alternative 4, all of the riverfront lands including Port Terminals and marine operations, and expansive stretches of land currently zoned IG would be placed in the MML zone. Land use compatibility impacts there would be similar to alternatives 2 and 3 and reduced compared to Alternative 1.

Under Alternative 4 (as in Alternative 2) edges of South Park and Georgetown residential areas would be zoned UI, and increased infill development with light industrial uses, brewers/makers,

and small manufacturers with large ancillary spaces is expected. However, the zone would enable an estimated 240 industry supportive residential units interspersed in these areas. Use compatibility conflicts would be similar to those described for Alternative 3 but greater in scale.

Land use changes and resulting compatibility impacts in the triangular area that would be removed from the MIC in Georgetown and the land removed from the MIC at the edges of South Park and placed into a mixed-use zone would be the same as under Alternative 3.

Overall, while there is potential to reduce land use conflicts by creating cohesive mixed-use districts in Georgetown and South Park over time, the process would result in interim land use compatibility impacts that rise to the level of **moderate**.

Employment Mix

As seen above in **Exhibit 3.8-15**, the overall employment under Alternative 4 would increase by 59,200 jobs. The mix of industrial employment would decrease by 2.5% points compared to 53.6% in the Alternative 1—No Action, but total industrial employment would increase by 28,800 jobs. The percentage of industrial employment would remain at roughly 50% or greater in every subarea under the alternative. Although there would be an increase in non-industrial employment in office and ICT sectors, the increase in industrial employment due to stronger protections in the MML zones, inclusion of new light industrial space in II zone development, and industrial redevelopment of the Armory site would result in bigger increases in industrial employment. Since the employment mix of industrial would drop to 50.0% in Ballard—at the threshold for percentage of industrial employment in MICs per regional criteria—a minor adverse impact in employment mix is present for the Ballard Subarea.

Land Use Transitions

Alternative 4 has the greatest amount of proposed change but at the transitions from core industrial areas to nonindustrial areas result in the same or fewer impacts than Alternative 3. In this alternative some areas that are proposed to be zoned UI in Alternative 3 are proposed to be II which, like UI, precludes the potential for high impact/high intensity uses to abut or encroach on nonresidential areas but could result in some impacts related to height, bulk, scale, and aesthetics.

Ballard

The central part of the Ballard Subarea bisected by 14th Avenue W is proposed to be rezoned from IG1 to II. This change is expected to result in a mix of light industrial and commercial development. The change from IG to II will provide a better transition to nonindustrial areas to the north by reducing the likelihood of high impact/high intensity uses encroaching or abutting nonresidential areas. In northwest Ballard where industrial land abuts nonindustrial land, the proposal is to rezone existing IC zoned land to II providing a similar transition as Alternative 1—No Action and maintaining the unlikely potential for high intensity/high impact uses to abut or encroach on nonindustrial areas. However, larger and taller buildings anticipated by the II,

particularly near transit stations, have the potential for impacts related to height, bulk, scale, and aesthetics adjacent to nonindustrial areas. Impacts of the proposal in Ballard are **moderate**.

Interbay Dravus and Interbay Smith Cove

The proposed land use changes in the Interbay Dravus and Interbay Smith Cove subareas are identical to those proposed in Alternative 3 and the resulting impacts are the same.

SODO/Stadium

The proposed land use changes in the SODO/Stadium Subarea are the same as Alternative 3 except for a small node of land on the west side of Harbor Avenue SW which is proposed to be changed from IB to UI. The impacts are similar to impacts identified in the other alternatives.

Georgetown/South Park

The proposed land use changes in Interbay are identical to those proposed in Alternative 3 and the resulting impacts are the same.

Other Industrial Zoned Lands

Alternative 4 proposes the same changes for land outside the MICs that Alternative 3 proposes and there are no impacts due to lack of transition between core industrial areas and nonresidential areas.

Summary of Impacts

Exhibit 3.8-16 summarizes adverse impacts under each alternative by subarea. The degree of impact varies within subareas and may only manifest in a subset of locations. The greatest adverse impact identified within each subarea is listed in **Exhibit 3.8-16**, below.

Exhibit 3.8-16 Summary of Land Use Impacts by Subarea and Alternative

Category of Land Use Impact		Alt. 1	Alt. 2	Alt. 3	Alt. 4
Consistency with Plans & Policies	Ballard	Moderate	Minor	Moderate	Moderate
	Interbay Dravus				
	Interbay Smith Cove				
	SODO/Stadium				
	Georgetown/South Park				
Compatible Uses	Ballard	Moderate	Minor	Moderate	Moderate
	Interbay Dravus	Moderate	Minor	Minor	Moderate
	Interbay Smith Cove	Moderate	Minor	Minor	Minor
	SODO/Stadium	Moderate	Minor	Moderate	Moderate
	Georgetown/South Park	Moderate	Minor	Moderate	Moderate
Transitions	Ballard	Moderate	Moderate	Moderate	Moderate
	Interbay Dravus	Moderate	Moderate	Moderate	Moderate
	Interbay Smith Cove	None	None	None	None
	SODO/Stadium	Minor	Minor	Minor	None
	Georgetown/South Park	Minor	Minor	Minor	Minor
Employment Mix	Ballard	None	None	None	Minor
	Interbay Dravus	None	None	None	None
	Interbay Smith Cove	None	None	None	None
	SODO/Stadium	None	None	None	None
	Georgetown/South Park	None	None	None	None

Source: City of Seattle, 2021.

3.8.3 Mitigation Measures

Incorporated Plan Features

Many of the potential land use impacts are mitigated down to non-significant level by incorporated plan features that are a part of the proposal. These aspects are described elsewhere in the Chapter; especially important mitigating features are highlighted below.

- **Reduced maximum size of use limits.** Proposed MML zone standards include maximum size of use limits of 10,000 sq. ft for offices, medical services (and others), a 7,500 limit for general retail sales, and 3,000 sq. ft. for bars and restaurants. These are significant reductions compared to current IG zones. The proposed UI zone also includes reduced

maximum size of use limits for stand-alone non-industrial uses. These reductions reduce the potential for incompatible use and employment mix impacts.

- **Incentive structure in the II zone.** The incentive bonus system would ensure that any new non-industrial development includes bona-fide, newly constructed industrial space. New development of high value uses supports the construction of new space for industrial uses. This contrasts with the existing IC zone, in which new development frequently includes no industrial space. This feature mitigates potential plan consistency, incompatible use, and employment mix impacts.
- **Limits on changes to MIC boundaries.** The proposed Comprehensive Plan policy to limit changes to MIC boundaries will mitigate potential future impacts related to incompatible land uses in all alternatives.
- **Limitations on Occupancy of Industry-Supportive Housing.** The limitation on occupancy mitigates potential incompatible use and policy inconsistency impacts. With a limitation on residents to persons engaged in and familiar with industrial operations and/or making/arts, new residents introduced into industrial areas would have greater understanding of the impacts (noise, odors etc.) compared to the general population. Residents would have better understanding of safety protocols and potential hazards of an industrial area. They would be less likely to levy complaints against industrial businesses, and more likely to use protections in appropriate situation such as safety glasses and hearing protection. Potential residents would be more likely to have full awareness of any potential hazards when choosing whether to live there compared to the general population. These factors significantly reduce adverse effects typically associated with introduction of residences into an industrial area.
- **Comprehensive Plan Policy Amendments.** Comprehensive Plan goal and policy amendments set a new vision and guidance for the city's industrial areas and address new aspects such as high-capacity transit. Without the foundational policy amendments all the Action alternatives would likely have significant adverse impacts on consistency with the current Comprehensive Plan policy framework. Since the plan amendments are an integrated part of the proposal, policy inconsistency is mitigated down to a non-significant level for all Action Alternatives.
- **Development standards in the UI zone.** Reduced setbacks would allow for construction on more small sites, which provides buffering affects. The standards also include increased requirements (compared to the IB zone) for urban style streetscape improvements and would introduce the green factor landscaping requirement. Development standards for development in the UI zone These features reduce the potential for transition impacts.
- **Completion of MIC subarea plans.** The proposal includes completion of subarea plan updates for the Greater Duwamish MIC and BINMIC. The plans would be updated to reflect the umbrella policy updates in the Comprehensive Plan, and the land use and zoning changes described in this EIS. Data and information included in Chapters of this EIS and related studies would be integrated into the subarea plans. Additionally, the plans would address more location specific strategies for integration of amenity features, open spaces,

configuration of circulation improvements and other non-land use features. Completion of the plans will mitigate potential use compatibility, transition impacts.

Regulations & Commitments

Many of the potential land use impacts are mitigated down to non-significant level by the presence of existing regulatory commitments that would apply with or without the proposal.

- **Shoreline Master Program (SMP).** The existing SMP regulations are unchanged and will continue to apply to all new development. SMP regulations supersede underlying zoning. Many of the SMP regulations supporting protections for industrial maritime activities at the shorelines in industrial areas under all alternatives. These designations require water-dependent and water-related uses at the shoreline and will provide protection from incompatible land uses for all alternatives for land that is within 200' of the shoreline.
- **SEPA Project Level Review.** The existing State Environmental Policy Act (SEPA) regulations are unchanged and will continue to apply to all new development at the time of project level review. SEPA project level review would apply to any development proposal that includes 4 or more residential units, or 12,000 or more sq. ft. of non-residential development. Site specific factors would be considered at the time of project level SEPA review, and development projects could be conditioned to address any localized impacts pursuant to Chapter 25 of the SMC and other State RCW 43.21C.
- **Noise Ordinance.** Application of the City's Noise Ordinance (SMC 25.08) can mitigate impacts from poor transitions from industrial areas to nonindustrial areas by limiting noise impacts to adjacent areas.

Other Potential Mitigation Measures

Though no significant adverse land use impacts are identified, it would be possible to further mitigate the identified moderate and minor land use impacts with the following actions. Incorporation of these actions would reduce the likelihood that any of the impacts could potentially become significant.

- **Apply maximum size of use limits to industrial zones in Alternative 1.** If Alternative 1—No Action is selected, expected use incompatibility impacts and policy conflict impacts could be reduced by incorporating maximum size of use reductions for office and retail uses (similar to the MML zone) into the existing Industrial General zones. This could be stand-alone legislation. The maximum size of use limits could be applied to areas only within designated MICs in order to provide continued flexibility for IG zoned areas outside of MICs.
- **Limit the geography of industry-supportive housing and monitor.** Incompatibility, transition, and policy inconsistency impacts could be mitigated to a lower level if the proposed industry supportive housing allowances are initially limited to a smaller geography. Limits could test the concept in a pilot area, or the proposed UI zone could include versions with and without the expanded housing allowances. The City and partners could monitor the initial effects of the expanded housing allowances for an initial test

period of 3–5 years, then consider applying to more areas. Stakeholders in industrial areas such as community organizations, Business Improvement Areas (BIAs) and trade groups could be involved in the monitoring process through formation of a stewardship group.

- **Update zoning at edge areas outside of the study area in the future.** Changes include limiting significant housing development in adjacent mixed-use zones to reduce potential impacts related to inadequate transitions from industrial to nonindustrial areas, particularly where core industrial zones are located close to these transitions**.** Changes could include application of the proposed Urban Industrial zone to more areas outside of industrial areas, including in some urban villages.
- **Contributions towards equitable development.** There have been historic impacts from industrial activities on populations including indigenous communities that preceded this proposal. It is plausible that continuation of land uses according to City and regional policies could perpetuate past harms according to some populations including indigenous peoples. As a voluntary measure unrelated to impacts of any of the proposal's alternatives, current owners of land could support equitable development for indigenous groups by developing a broad-based system of contributions to community building and resilience. The contributions could take forms such as donations to ongoing community development initiatives identified in the Duwamish Valley Action Plan, or participation in the Duwamish's Real Rent program. As infrastructure investments are made in the study area, promote equitable phasing and locations to reduce historic impacts with input from affected community members. Examples include improving parks and streetscapes to reduce heat island effects, improving existing transitions to residential areas, improving noise attenuation to residential areas, and reducing existing risks of sea level rise.
- **Design Guidance for development in the UI and II zones when abutting nonindustrial areas.** Non-codified design guidance to address impacts associated with height, bulk, scale, and aesthetics, and design treatments appropriate for the edges of industrial areas could be a resource for developers and community members alike in developing projects that abut nonindustrial areas.

3.8.4 Significant Unavoidable Adverse Impacts

Across all alternatives the City found minor and moderate impacts related to land and shoreline use:

- **Inconsistency with Plans and Policies:** Some degree of inconsistency between the expected land use pattern and plans and policies was found for all the alternatives. Since consistency of land use patterns with plans and policies requires interpretation and balancing with many policies, it is common for some inconsistency to exist, while maintain an overall predominant level of consistency. Alternative 1—No Action would have moderate inconsistencies due to the likely continuing trend of stand-alone retail and office development and mini storage locating in industrial zones and MICs under existing zoning. This is inconsistent with certain policies prioritizing industrial and maritime uses in these

areas. Moderate inconsistencies would be present under alternatives 3 and 4 due to the introduction of increased amount of industry-supportive housing, which can be viewed as inconsistent with some regional and local policies limiting residential uses in MICs. Alternative 2 would have the fewest, and only minor, inconsistencies because Alternative 2 would reduce the prevalence of non-industrial uses in industrial areas through new standards in the proposed MML zone in larger areas than alternatives 3 and 4, and Alternative 2 does not include expanded allowances for housing.

- **Incompatible Land Uses:** Moderate incompatible use impacts are expected in all subareas under Alternative 1 due to the potential for stand-alone retail and office developments and mini storage to locate in industrial areas causing potential incompatibility with industrial uses. Alternatives 3 and 4 would see moderate incompatible use impacts in some subareas—most notably Ballard, Stadium/SODO, and Georgetown/South Park—where introduction of new buildings with dense employment in the II zone and industry-supportive housing in the UI zone could create incompatibilities between new activity patterns and adjacent areas of continued industrial uses. Alternative 2 would have the fewest, and only minor, land use incompatibilities since the application of the II and UI zones would be more limited in scale.
- **Inadequate Transitions:** Potential for inadequate transitions from industrial to nonindustrial areas is highest for the Ballard and Interbay/Dravus subareas. Moderate impacts at transitions would be expected in Interbay/Dravus under all the alternatives, and in Ballard under alternatives 1, 2, and 3. In general, portions of the study area that abut residential and urban village locations without strong physical edge features such as greenbelts, major roadways or topographical changes have greater potential for inadequate transition. Future land use under the UI zone is expected assuage potentially inadequate transitions to residential and urban village areas, thus Alternative 4, which includes more UI zoning in the Ballard subarea would have moderate transition impacts. Minor transition impacts are identified for the Georgetown/South Park subareas under all the alternatives, and for the Stadium/SODO area under alternatives 1, 2, and 3. No transition impacts are expected for Interbay/Smith Cove under any alternative primarily because of the strong physical edges around the subarea.
- **Employment Mix Impacts:** With one exception, no employment mix impacts are expected. In all subareas and under all alternatives, the projected employment mix would remain 50% or more industrial—one of the threshold criteria for regional designation as a MIC. A minor employment mix impact was identified in Alternative 4 for the Ballard subarea, where the percentage of industrial employment is projected to fall to a level approaching the 50% threshold.

Under all of the alternatives, any inconsistencies with plans and policies, incompatible land uses, undesired employment mixes, or inadequate land use transitions described above would be minimized and reduced to less than significant levels via incorporated plan features and existing regulations and commitments. No significant unavoidable adverse impacts to land or shoreline use are anticipated under any of the alternatives.