



April 15, 2022

City of Seattle
Office of Planning and Community Development (OPCD)
Via email PCD_Industry_And_Maritime_Strategy@seattle.gov

RE: Industrial and Maritime Strategy Draft Environmental Impact Statement

Dear Office of Planning & Community Development (OPCD):

Thank you for the opportunity to comment on the City of Seattle's Industrial and Maritime Strategy Draft Environmental Impact Statement. This letter is submitted on behalf of the Duwamish River Community Coalition, in collaboration with Georgetown Community Council (GCC), King County International Community Coalition (KCIACC), Duwamish Valley Safe Streets (DVSS), and the Duwamish Valley Affordable Housing Coalition (DVAHC).¹ We write to express our collective concerns regarding the Draft Environmental Impact Statement (DEIS) analysis, proposed land use updates, and community engagement process since its inception. From our world view, the DEIS is deeply connected to the history of white settlement, heavy industrialization, and discriminatory housing policies that have left the Duwamish Valley community fighting for the advancement of environmental and climate justice for decades to come. The City must remain accountable to its actions and prioritize the wellbeing of the Duwamish Valley community over industry and profit in the Industrial and Maritime Strategy.

The Industrial and Maritime Strategy is an opportunity for the City of Seattle to right the wrongs set forth by the white settlement and early industrialists of the Seattle area, an issue of zoning and land use change. In addition, the strategy presents a unique opportunity for the City to reconfigure processes for on-going, low-barrier, multilingual community engagement regarding land use updates for a more inclusive and fair engagement process. More so, the Industrial and Maritime Strategy should not move forward independently of the Comprehensive Plan, Seattle Transportation Plan and Freight Master planning.

¹ *The Duwamish River Community Coalition. DRCC/TAG is a non-profit that seeks to amplify and lift up the voices of the Duwamish River Valley community members, specifically those most harmed by the combined impacts of climate change, health disparities, and environmental and economic inequities. DRCC/TAG's mission is to elevate the voices of those impacted by Duwamish River pollution and other environmental injustices to advocate for a clean, healthy, and equitable environment for people and wildlife.*

While we are glad OPCD granted two extensions for public comment, including a special accommodation for Duwamish Valley neighbors, the community engagement process remained insufficient. For a community facing a myriad of intersecting challenges we advocated for full authentic community engagement as stated in the City of Seattle Duwamish Valley Program's environmental justice guiding principles and the Duwamish Valley Program's racial equity outcomes to avoid perpetuating the very injustices and inequalities in the Duwamish Valley.² The insufficiency also holds communities' frustration towards the City of Seattle's disregard of long-standing advocacy on issues, such as industrial pollution, that remain unresolved and will be made worse by an increasing population and activities proposed by the Industrial and Maritime Strategy (Alternatives 3 and 4).

While we champion workforce development and new housing opportunities for moderate to very low-income neighbors, existing environmental and health disparities must be eliminated before passing a strategy that will increase the number of residents who are exposed to environmental hazards, perpetuating the disproportionate exposure to environmental pollution in our geography. **To do this, we strongly urge the City to move legislation forward that increases environmental regulation standards, defines cumulative impacts and ensures all mitigation measures in the DEIS will be implemented without challenge.**

To protect and support industry and Port operations without procedural justice and higher environmental standards for the residential communities of South Park and Georgetown ignores the reality of today and should not be acceptable to any of us. In this way, the DEIS is not separate from the history of the Duwamish River and the vibrant communities in its proximity. Thus, land use planning must prioritize the recommendations made by the long standing communities that have borne the burden of industrialization in the City of Seattle for generations.

The Duwamish river is a living reflection of what the City has been as well as who and what the City of Seattle can be. This letter first explains why strong environmental standards and meaningful engagement of the diverse Duwamish Valley community is necessary to eliminate negative cumulative health impacts experienced everyday, and why the DEIS must check the integrity of its data analysis and mitigation measures to eliminate bias and injustice towards a community that has long been affected by racism rooted in environmental and land use planning and policy.

ANALYSIS

I. THE DEIS MUST ACKNOWLEDGE THE HISTORY OF SEATTLE AND THE INDUSTRIALIZATION OF THE DUWAMISH RIVER

Until the 20th century, the Duwamish River was a rich, meandering river with areas of mudflats and marshes. In the early 1900s, the lower section of the river was straightened and dredged for industrial development. By the 1940s, channelization had transformed a 9-mile estuary into the 5 miles we know today was the Duwamish River, a

² http://greenspace.seattle.gov/wp-content/uploads/2018/06/DuwamishValleyActionPlan_June2018.pdf

Superfund Site.³ More than 97% of the wildlife habitat that existed in the Duwamish River was destroyed. During this same time period, the City of Seattle was a segregated city; racial restrictive covenants and deed restrictions compounded by systems of discrimination prevented Black, Indigenous, Asian Americans, Pacific Islanders, Hispanic and Latino populations from renting, buying or occupying property in most parts of the city.⁴ Because of this, nonwhite Seattle neighbors were locked into census tracts of South Seattle and this residential pattern remains well established today.

The significance of including the history of the Duwamish River and segregation in the City of Seattle is to shed light on the intersectional nature of land use and zoning change and its role in discriminatory practices that still impact Seattle today. Therefore, the DEIS disregards its responsibility to respond to the pollution disparities caused by decades of exclusionary land use decisions and harm done to communities of color. This history is woefully underscored in the DEIS, lacking honest accountability for past harms still impacting community today.

Because of this, we view the DEIS as a process with serious implications that cannot be rushed and must undergo rigorous community review, environmental and public health analysis to ensure decisions do not leave neighborhoods like the Duwamish Valley highly exposed to environmental hazards, odors, noise, traffic and unfair opportunities to engage in decision-making processes during a global pandemic.

New research from the University of Washington and the University of California at Berkeley explains how residents in communities like the Duwamish Valley are exposed to greater levels of significant air pollutants compared to communities living in Home Owners' Loan Corporation (HOLC) better-graded sections of the same city.⁵ The census tracts in the Duwamish Valley are ranked highest in the state for diesel NOx pollution and disproportionate burden.⁶

Despite emerging research, long-standing community advocacy for strong environmental standards and consideration of cumulative impacts, the DEIS continues to move forward without resolution for stronger environmental standards that will increase health equity for current and future Duwamish Valley residents.

If the City of Seattle moves forward with the Industrial and Maritime Strategy, comprehensive rules for increased environmental standards and protections from displacement driven by market forces must be enacted before its adoption. In addition, UI areas must be expanded to buffer, strengthen preservation of homes and prevent future displacement of neighbors who deserve equitable access to the benefits of nature.

³<https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-sites/Lower-Duwamish-Waterway/Site-history>

⁴ https://depts.washington.edu/civilr/segregation_maps.htm

⁵ <https://pubs.acs.org/doi/10.1021/acs.estlett.1c01012>

⁶ Wash. Dep't of Health, Env't Health Disparities Map <https://fortress.wa.gov/doh/wtnibl/WTNIBL/> (Diesel Pollution and Disproportionate Impact").

II. THE DEIS EQUITY, ENVIRONMENTAL JUSTICE ANALYSIS, AND MITIGATION RECOMMENDATIONS ARE BIASED AND INCOMPLETE

Today, the Duwamish Valley is a predominantly non-white, “near port”, and environmental justice community along the Duwamish River in Seattle. Large swaths of the Duwamish Valley are in the top 5% of communities nationwide with the highest proximity to traffic and traffic volume, and highest exposure to diesel PM pollution.⁷ In addition, the Duwamish Valley Youth-led Moss Study found “hotspot” areas where high levels of ambient arsenic, chromium, nickel, cobalt exist.⁸

The DEIS concentrates solely on land use change and ignores a deep consideration for justice and intersectionality of community health and well-being. The equity and environmental justice analysis does not adequately reflect current public health data or incorporate community driven research stories into its data review. **Because of this, the authentic experiences of living in the Duwamish Valley in close proximity to industry are excluded, presenting a bias of how the information in the DEIS was collected, analyzed, interpreted and presented. In addition, existing data evaluated within the DEIS is inaccurate and must be addressed before moving forward to ensure credibility.**

Examples of inaccuracy include:

A. Public space:

“In Georgetown and South Park neighborhoods (within and outside of the Georgetown portion of the Greater Duwamish MIC) access to public space is comparable and, in some cases, better than the City as a whole. Georgetown and South Park scored 77 and 80 (Public Space Access Score out of 100) respectively in comparison to Seattle which scored 73.”⁹

Data points on public space paint a false picture and correlates with concerns regarding active transportation. The neighborhoods of South Park and Georgetown are surrounded by highways, centered in the heart of Seattle's freight corridor. In this way, access to public space is highly limited and often a risk to public safety. While community projects are underway, Georgetown and South Park have some of the lowest tree canopy coverage in Seattle and many existing parks remain inaccessible due to contamination cleanup and lack of welcoming infrastructure.

None of these alternatives aim to base their approach on a regenerative model of planning. None of them are rooted in the needs of the land and healing a space that remains a home to our cities most vulnerable in terms of both people and nature. Seattle has made great promises within the City's Equity and Environment Agenda and these alternatives fall short in all areas of this identified agenda.

⁷ U.S. Env't'l Pro. Agency, EJScreen 2.0, <https://ejscreen.epa.gov/mapper/> (“People of Color” Socioeconomic Indicator).

⁸ <https://static1.squarespace.com/static/5d744c68218c867c14aa5531/t/5f10f3cae34eb20502407d57/1594946507283/Duwamish+moss+Fact+Sheet+final.pdf>

⁹ Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.12, page 3-477

B. Air Particulates: Dust impacts from increased VMT in the area is not covered in the DEIS.

The soils in the Duwamish Valley are notoriously fine, therefore very dusty, and with many unpaved curbs and no sidewalks in many areas, which could result in crease dust/PM10 impacts in certain locations.

C. Air quality:

“Overall, the air quality in the Puget Sound has continued to improve to meet the standards, though the number of wildfire-impacted days has increased in the last five years.”¹⁰

Duwamish Valley lacks a comprehensive air monitoring network that provides sufficient disaggregated air quality data. For an environmental justice community, disaggregated data is critical for understanding “hotspots” or areas that hold high levels of pollution. The DEIS fails to include sufficient disaggregated data for the Duwamish Valley. These hotspot areas are not captured in the current monitoring stations closest to MICs reviewed in the DEIS, thus the claim that air quality has improved overall (including for the Duwamish Valley) is inaccurate.

D. Freight:

“Exhibit 3.10-40 Impacted Study Corridors—GreaterDuwamishMIC,2044 – The Duwamish Valley study areas excludes the majority of South Park and Georgetown neighborhoods, where freight also frequently travel and park in addition to the West Seattle Bridge detours.”¹¹

The Duwamish Valley is disproportionately impacted by diesel pollution because it is a high traffic transportation corridor. Three freeways border the Duwamish Valley: Interstate 5, Highway 99, and the West Seattle Bridge. During the two years that the West Seattle Bridge has been closed for repairs, an average of 100,000 vehicles per day have been rerouted through the Duwamish Valley.¹² Numerous major trucking routes pass through Georgetown and South Park, carrying freight from the Port of Seattle, and nearby industry. Goods movement is one of the largest sources of air pollution in Washington State, 75% of heavy duty trucks pass-through the Duwamish Valley. In this way vehicles miles traveled (VMT) is important to understand how much pollution a truck emits over the course of the year based on how many miles it traveled over the course of the year. To not include comprehensive data of the Duwamish Valley is a job half done.¹³

¹⁰ Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.2, page 3-29

¹¹ Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.10, page 3-418

¹² City of Seattle, West Seattle Bridge Program, <https://www.seattle.gov/transportation/projects-and-programs/programs/bridges-stairs-and-other-structures/bridges/west-seattle-bridge-program>.

¹³ Exhibit B. Fehr & Peers, City of Seattle – Zero Emission Area Data Collection, at 16 (Sep. 2, 2021).

Furthermore, the DEIS also fails to mention correlating public health data such as the high hospitalization rates for children and adults living in the Duwamish Valley compared to the rest of Seattle.¹⁴

III. MEANINGFUL ENGAGEMENT WITH A WHOLEHEARTED EFFORT TO REACH THE DIVERSITY OF THE DUWAMISH VALLEY COMMUNITY FALLS SHORT

The initial process to submit public comment was not designed for meaningful involvement of the Georgetown and South Park Duwamish Valley community, inhibiting procedural justice and fair opportunity to provide comment. Failing to properly inform the community for a public comment process with timely multilingual tools is an environmental injustice as the community holds significantly less resources compared to the industries also included in the DEIS. For example, it is unacceptable for a public comment period to be open without the existence of publicly accessible translated materials.

While the City's OPCD expressed aims to build relationships around the topic of the DEIS, diverse representation of the community remained low during the public comment process. This outcome conflicts with the race and social justice initiative commitments of all City staff, operations, policies and practices.

IV. MITIGATION RECOMMENDATIONS ARE NON-NEGOTIABLE AND MUST BE IMPLEMENTED

It is concerning that mitigation recommendations for the DEIS are not true commitments considered by the Strategy. **This means that impacted residents are asked to volunteer their time to provide feedback on mitigation measures without any reassuring commitment from the City to follow up and solve deep rooted issues regarding environmental hazards and chronic issues of injustice.**

More troublesome, trade offs and mitigation methods to resolve existing community concerns are not fully analyzed, future predictions for 2040 are unclear, and too much of the DEIS relies on a network of citywide initiatives not yet fully realized. Community needs clear environmental justice standards and equitable safeguards for anti-displacement in a rapidly changing city included in the mitigation analysis. It is unfair to resolve all environmental justice concerns by proposing redevelopment in the community while industry remains protected.

Areas that need significant mitigation and reassurance include:

- **Active transportation:** Environmental and transportation solutions noted are centered in small areas and don't take into account the systems of connectivity and intertwining that the area needs.

¹⁴ <https://southseattleemerald.com/2021/02/28/opinion-clean-air-everywhere-for-everyone-in-washington/>

“Significant impacts were identified to both active transportation and safety due to the projected increase in people walking and biking in areas with network gaps and the increased potential for vehicle conflicts (particularly trucks) with vulnerable users.... Therefore, it is expected that the Action Alternatives could have significant unavoidable adverse impacts to active transportation and safety.”¹⁵

- We support the comments of the Seattle Bike Advisory Board. Both people and natural systems don't exist within isolated areas; they are greatly impacted by the activities that surround them.
 - Each alternative only further perpetuates South Park and Georgetown remaining isolated and at odds with industrial usage all around them, treating them as islands unto themselves.
 - The impacts of the King County International Airport and paused expansion are not fully considered, including the fuel farm and current lead pollution from aviation activities and must be addressed.
- **Air quality:** Increased GHG emissions is a step backwards and fails to account for regional goals around emission reduction and must be addressed to avoid impacts related to climate change.

“All alternatives—in particular alternatives 3 and 4—contribute to increased GHG emissions through future growth and development in the study area. All Action Alternatives result in GHG emissions above the 10,000 MTCO₂e mandatory reporting threshold compared to Alternative 1 No Action.”¹⁶

- **Air pollution:** Mitigation for air pollution impacts on an increased population must lead to design safeguards and changes regarding the ways industry operates in close proximity to neighbors.

“Depending on the transportation routes that are used, emissions of air pollutants from mobile sources could concentrate along routes that pass through vulnerable communities, leading to inequitable exposure to air pollution.”¹⁷

- **Displacement:** The description of risk of displacement does not reflect community concerns regarding displacement pressures and affordability.

“Overall, parcels within the study area are at low or moderate risk for displacement.... While some loss of existing housing may be possible under this Alternative this is an expected part of a changing urban environment.”¹⁸

- Emphasis on affordable housing for moderate to very low-income residents

¹⁵ Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.10, page 3-427

¹⁶ Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.2, page 3-78

¹⁷ Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.2, page 3-57

¹⁸ Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.9, page 3-321

- Nevertheless, many of the locations proposed for UI zoning are limited for opportunities such as increased affordable housing while industrial and port operations receive the largest percent of protection under the proposal.
- **Sea Level Rise and disregard for the Superfund impacts:** Impacts of sea level rise and additional threats of climate change must be taken more seriously throughout all mitigation areas.

“The Duwamish River and Longfellow Creek are each listed as an impaired water body for fecal coliform bacteria, temperature, pH, and dissolved oxygen. Water quality treatment at redevelopment sites will reduce fecal bacteria and other pollutant impacts at sites that redevelop. Significant portions of both Georgetown and South Park neighborhoods are susceptible to sea level rise and all Alternatives, including the No Action Alternative, would increase the concentration of people in these vulnerable areas. Compliance with requirements of the SMP and frequently flooded areas requirements at redevelopment sites, in addition to adaptation measures listed in the mitigation section, may help reduce vulnerability to sea level rise in some portions of the subarea.”¹⁹

- **Fairness in zoning:** Increase mixed-use areas in Georgetown and South Park to allow for a larger percentage of community-driven anti-displacement efforts.

“Alternative 4 would also strengthen protections for core industrial uses in the MML zone on approximately 87% of industrial lands”²⁰

Without binding legislation for mitigation measures and a year-long comprehensive community engagement process, we believe the Maritime and Industrial Strategy will uphold the systemic environmental exposure disparities experienced by the Duwamish Valley community for years to come. **We join the Georgetown Community Council (GCC) in their recommendation to send a companion binding legislation to the City Council that codifies and funds recommended mitigation measures.**

V. ACT ON THE VISION AND ISSUES EXPRESSED IN THE COMMUNITY ADVISORY GROUP

In early 2020, Georgetown and South Park community members were invited by the City to discuss their vision and top issues for the Maritime and Industrial Strategy to address. This group strongly expressed the importance of including the elements of maintaining a diverse and vibrant community, environmental equity and pollution mitigation, healthy environment in communities and in industrial areas next to them, affordable housing, workforce development and housing, and job creation.

We believe the suggestions made by the community advisory group were not fully represented throughout all of the alternatives and the significant impacts predicted compromise current neighborhood goals related to the elimination of environmental and health inequities.

¹⁹Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Chapter 3, Section 3.3, page 3-97

²⁰ Seattle Industrial & Maritime Strategy, December 2021, Draft EIS Summary, page 1-4

In this way, the DEIS must consider an additional alternative that reflects all the priorities of the community for a fair consideration of proposed alternatives. We ask the City to include an additional alternative, alternative 5, that will mirror the realities of today for the future community, not industry, to believe in.

VI. RECOMMENDATIONS OVERALL

- A. Commit to a continued community engagement process that reaches far into the diverse and multilingual communities of the Duwamish Valley for the next year and duration of this EIS to legislation.
- B. Expand buffers and UI areas to allow for more affordable housing in addition to increased allotted mixed-use zoning in favor of community over industry.
- C. Draft a companion binding legislation with community for the DEIS that (1) sets a commitment to mitigate all impacts caused under this plan and (2) enforces higher environmental standards for pollution control inclusive of cumulative impacts and related health outcomes.
- D. Increase credibility of data and include disaggregated in the DEIS.
- E. Slow down the DEIS process to allow for the initiatives on which it relies to mitigate impacts make significant headway to avoid undue harm.
- F. Address current issues around pollution, compliance, and enforcement for a healthier environment.
- G. Fold the DEIS process into the comprehensive plan update.

CONCLUSION

For decades, the Duwamish Valley has raised serious concerns with regards to industrial pollution, lack of green public space, affordable housing, noise disturbance, public safety and visible air pollution and more. In closing, the Industrial and Maritime Strategy must embody the Racial Equity Outcomes described in the Duwamish Valley Action plan, including equitable access to city resources, accountability and decision-making.²¹ The community continues to wait for equitable safeguards from neighboring polluters while business as usual continues. This chronic issue must be addressed and land use change presents a unique opportunity to rezone more spaces for the community in order to restore environmental health and champion placekeeping, economic justice and resilience.

We strongly recommend the City of Seattle commit to frequent and authentic community engagement around land use in order to strengthen environmental standards for industrial neighbors before moving forward on a plan that protects industry over community for generations to come.

²¹ http://greenspace.seattle.gov/wp-content/uploads/2018/06/DuwamishValleyActionPlan_June2018.pdf

To address the long-lasting, cumulative impacts of pollution and systemic disinvestment in communities like the Duwamish Valley, it is essential for the City of Seattle to prioritize the recommendations of the Duwamish Valley community.

Sincerely,

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