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**Appeal Details**

**Address:**  
**Decision Elements:** SEPA;

**Interest:** See attached  
**Objections:** See attached

**Desired Relief:** Appellants Washington State Major League Baseball Stadium Public Facilities District and Seattle Building & Construction Trades Council seek an order from the Examiner (a) finding the City's adoption of the FEIS and FEIS addendum, to be clearly erroneous and not supported by law or fact, (b) reversing the City's adoption of the FEIS and FEIS addendum, and (c) remanding the matter to the Seattle Office of Planning and Community Development for further environmental review under SEPA to cure the deficiencies outlined above.

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**Uploaded Material**

1. **2026 05 28 PFD SEPA Appeal FINAL.pdf**  
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BEFORE THE HEARING EXAMINER  
FOR THE CITY OF SEATTLE

In Re: Appeal by  
  
WASHINGTON STATE MAJOR  
LEAGUE BASEBALL STADIUM  
PUBLIC FACILITIES DISTRICT; and  
SEATTLE BUILDING &  
CONSTRUCTION TRADES COUNCIL,  
  
of the City of Seattle’s adoption of a Final  
Environmental Impact Statement and FEIS  
Addendum for the Greater Duwamish  
Manufacturing and Industrial Center  
Subarea Plan

**NOTICE OF APPEAL**

**INTRODUCTION**

This appeal is brought by the Washington State Major League Baseball Stadium Public Facilities District and the Seattle Building & Construction Trades Council.

Appellant Washington State Major League Baseball Stadium Public Facilities District (“PFD”) is a municipal corporation that owns T-Mobile Park in Seattle and oversees its operation for the public. T-Mobile Park is located in the City’s Stadium Transition Area Overlay District, which is located in the northern portion of the Greater Duwamish Manufacturing and Industrial Center. The PFD ensures that the interests of the people of the state, the users of the ballpark, and the people who live and work in the neighborhoods surrounding the ballpark are met with balance and fairness. In 1995 the Washington Legislature authorized King County to create the Ballpark PFD, and the King County Council formally established the PFD by ordinance that fall. The PFD’s mission is to maintain and enhance the City’s iconic baseball park in order to promote the success of Major League Baseball in the State of Washington, to enhance fan enjoyment, and to contribute to an economically successful, safe, desirable, innovative, and walkable stadium neighborhood. The PFD has interests beyond the ballpark’s walls, working to leverage its value by encouraging

1 positive outcomes in transportation, zoning and development, and livability issues in the  
2 surrounding neighborhoods of Seattle.

3 Appellant Seattle Building & Construction Trades Council is a regional labor coalition that represents  
4 over 15,000 unionized construction workers across 19 affiliated local unions in Seattle and King  
5 County. It operates to strengthen collective bargaining power, advocate for safe working conditions,  
6 and promote workforce solidarity. The council represents the voice of building trades workers in  
7 regional policy discussions, ensuring living-wage jobs and prioritizing union needs in legislative  
8 matters. It works collaboratively with employers, government agencies, and the community to foster  
9 an equitable construction industry by providing quality apprenticeship and skill development  
10 programs and coordinates joint efforts among local trade unions to facilitate negotiations, contract  
11 enforcement, and labor dispute support.

## 8 APPELLANT INFORMATION

### 9 Appellants

10 Washington State Major League Baseball Stadium Public Facilities District  
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12 Seattle, WA 98124  
13 (206) 664-3076  
14 info@ballpark.org

14 Seattle Building & Construction Trades Council  
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17 (206) 441-0550

### 16 Counsel for Appellants

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## 20 DECISION BEING APPEALED

21 This appeal challenges the City of Seattle’s adoption of the Final Environmental Impact Statement  
22 (“FEIS”) for the Industrial and Maritime Strategy, along with an FEIS addendum, for the purpose of  
23 evaluating the environmental impacts of the Greater Duwamish Manufacturing and Industrial Center  
24 Subarea Plan. A copy of the City of Seattle’s Notice of Adoption is attached hereto as Attachment A.  
25 The notice includes links to electronic copies of the documents being appealed.  
26

1 **APPEAL INFORMATION**

2 **1. Appellants’ Interests in this Appeal**

3 For more than two decades, the Washington State Major League Baseball Stadium Public Facilities  
4 District (“STAOD”), a unique zoning district created by the City of Seattle in 2000 to maintain the  
5 health and vibrancy of the area surrounding T-Mobile Park and Lumen Field, to contribute to a safer  
6 pedestrian environment for those attending sporting events, and to support the pedestrian-oriented  
7 character of the area as well as the surrounding industrial zone. Although the City has struggled to  
8 fully realize its vision for the STAOD not only as a destination sports and entertainment district, but  
9 also as a seven-day-a-week vibrant neighborhood, a significant component of the City’s vision has  
10 always looked forward to the eventual construction of much-needed workforce housing south of T-  
11 Mobile Park.

12 In 2025, one of the broadest coalitions ever assembled around a Seattle land use measure supported  
13 the City’s passage of Council Bill 120933, which sought to bring the STAOD into conformity with  
14 rest of the City’s Urban Industrial (“UI”) zone through the establishment of a Stadium Makers District,  
15 a mixed-use area combining workforce housing with light industrial maker spaces, retail, and  
16 entertainment uses adjacent to the stadiums. CB 120933 was ultimately overturned by Washington’s  
17 Growth Management Hearings Board for failure to follow required procedures. Even so, the City has  
18 continued to preserve the possibility of future housing in the STAOD through the adoption of the “One  
19 Seattle Plan” Comprehensive Plan Update in December of 2025. Among other things, the One Seattle  
20 Plan was drafted specifically to preserve the possibility of future housing in the STAOD if supported  
21 by “a City-initiated comprehensive study and review of industrial land use policies or as part of a  
22 major update to the Comprehensive Plan.” *See* One Seattle Plan at 52, Policy LU 13.3. The One Seattle  
23 Plan was also drafted to preserve the possibility of future housing in the STAOD “east of First Avenue  
24 S.” *Id.* at 53, Policy 13.8. In turn, these Comprehensive Plan Policies are consistent with the intent of  
25 the STAOD, an area that is intended “to allow a mix of uses that will encourage redevelopment and  
26 maintain the health and vibrancy of the area during times when the sports facilities are not in  
operation.” SMC 23.74.002.A. The Washington State Major League Baseball Stadium Public  
Facilities District owns Urban Industrial lands to the east of 1<sup>st</sup> Avenue South and supports this vision.

19 Contrary to the recently adopted One Seattle Plan, the City’s proposed adoption of the Greater  
20 Duwamish Manufacturing and Industrial Center Subarea Plan would completely eliminate the  
21 possibility of future housing in the STAOD, placing a blanket ban on future housing and undermining  
22 that area’s redevelopment as envisioned by the Seattle Municipal Code and the PFD’s mission.  
23 Specifically, Policy DLU 5.1 of the Greater Duwamish Manufacturing and Industrial Center Subarea  
24 Plan would add the following prohibition: “do not allow any residential uses and do not amend codes  
25 to enable even limited residential uses or residential uses under conditions.” Such a complete ban on  
26 future housing and code amendments would not just hinder redevelopment of the STAOD and the  
allowance of future residential uses—it would effectively tie the City’s hands for at least the next ten  
years, precluding lawmakers from even considering the passage of reasonable, responsible, well-  
supported legislation to allow any form of housing in the STAOD, undermining the PFD’s mission  
and posing a material detriment to the community. The impacts of these proposed changes are  
significant and long-lasting.

1 Members of the Seattle Building & Construction Trades Council work, celebrate, and recreate in the  
2 STOAD, including attending games, concerts, events, and graduations at T-Mobile Park and Lumen  
3 Field, and visiting local restaurants. Members of the Seattle Building & Construction Trades Council  
4 walk on 1<sup>st</sup> Avenue South and Occidental Avenue to get to the stadiums and support safe, walkable  
5 pedestrian-friendly environments to limit conflicts with freight operations. The Seattle Building &  
6 Constructions Trades Council are parties to binding agreements that ensure that future private  
7 development in the Stadium District within approximately 15 acres of Urban Industrial zoned land  
8 would be constructed with union labor, providing the opportunity support a substantial number of  
9 living wage jobs and apprenticeships and guarantee that construction of future mixed-use residential  
10 and maker’s space industrial projects will be built by its union members and high training and labor  
11 standards.

12 Since 2000, Seattle’s vision for the STAOD has been to encourage redevelopment and maintain the  
13 health and the vibrancy of the area. The City’s current Comprehensive Plan policies contemplate  
14 STAOD residential uses, especially dwellings for workers east of 1<sup>st</sup> Avenue South. As currently  
15 proposed and evaluated by the City under SEPA, the Greater Duwamish Manufacturing and Industrial  
16 Center Subarea Plan would frustrate that vision, completely eliminating any possibility of future  
17 housing in a manner that would both (a) harm the PFD and the members of the Seattle Building &  
18 Construction Trades Council and (b) be inconsistent with the City’s Comprehensive Plan and Seattle  
19 Municipal Code.

## 20 **2. Objections to the challenged decision**

21 In furtherance of this appeal, Appellants make the following objections to the City’s adoption of the  
22 Final Environmental Impact Statement for the Industrial and Maritime Strategy, along with an FEIS  
23 addendum, for the purpose of evaluating the environmental impacts of the Greater Duwamish  
24 Manufacturing and Industrial Center Subarea Plan.

- 25 1. The adopted FEIS and addendum, fail to take the requisite “hard look” at environmental  
26 impacts and do not provide a reasonably thorough evaluation of impacts on housing,  
consistency with land use plans and policies, and land and shoreline use—including direct,  
indirect, and cumulative impacts—caused by the proposed Greater Duwamish  
Manufacturing and Industrial Center Subarea Plan, including that plan’s impacts on the  
provision of needed affordable and workforce housing in the City of Seattle. For this reason,  
the City’s adoption of the FEIS is clearly erroneous and should be reversed.
2. The absolute prohibition on future housing in the STAOD contained in the Greater  
Duwamish Manufacturing and Industrial Center Subarea Plan is inconsistent and  
significantly conflicts with the One Seattle Plan’s goals and policies—including that plan’s  
broad “Vision of Housing Abundance”—including the following housing, growth, and land  
use goals and policies: Goal H G1 and Policies H 1.1 through 1.4; Goal H G2 and Policies  
H 2.1 through H 2.5; Goal H G3 and policies H 3.1 through H 3.19; Goal H G4 and Policies  
H 4.1 through 4.11; Goal H G5 and Policies H 5.1 through H 5.14; Goal H G6 and Policies  
H 6.1 through 6.8; Goal H G7 and Policies H 7.1 through H 7.10; Goal H G8 and Policies  
H 8.1 through H 8.6; Goal GS G1 and Policies GS 1.1 through GS 1.10; Goal GS G2 and  
Policies GS 2.1 through GS 2.2; Policies GS 3.1 through GS 3.7; Goal GS 10 and Policies

1 GS 10.1 through GS 10.8; Goal LU G1 and Policies LU 1.1 through LU 1.8; Goal LU G2  
2 and Policies LU 2.9 through 2.18; Goal LU G3 and Policies LU 3.1 through 3.7; Goal LU  
3 G4 and Policy LU 4.16; Goals LU G13.1 and LU G13.2, and Policies LU 13.1 through LU  
13.38; Goal LU G14 and Policies LU 14.1 through 14.4.

- 4 3. The Greater Duwamish Manufacturing and Industrial Center Subarea Plan would  
5 significantly conflict with purpose of the STAOD as specified in the Seattle Municipal Code,  
6 resulting in undisclosed and unevaluated significant adverse impacts under WAC 197-11-  
7 330(3)(e)(iii).
- 8 4. The inconsistencies created by the absolute prohibition on future housing are not discussed  
9 in the adopted documents, as required by WAC 197-11-440(6)(d)(i).
- 10 5. The impacts of the absolute prohibition on housing—including land and shoreline use and  
11 consistency with plans and policies as defined by the FEIS itself—are likely to be significant  
12 and must be evaluated in a supplemental environmental impact statement
- 13 6. In adopting the FEIS and FEIS addendum, the City of Seattle failed to follow the  
14 requirements of WAC 197-11-080 in its analysis of potential housing and land use impacts,  
15 including the production of a worst-case analysis.
- 16 7. The adopted FEIS uses the wrong legal standard for “significance” under SEPA, requiring  
17 such impacts to be “acute” and/or “severe.”
- 18 8. In adopting the FEIS and addendum, the City of Seattle violated WAC 197-11-600 by failing  
19 to evaluate the impacts of the Greater Duwamish Manufacturing and Industrial Center  
20 Subarea Plan in a Supplemental Environmental Impact Statement, as required by WAC 197-  
21 11-600(4)(d). Nor was the issuance of an addendum appropriate under WAC 197-11-  
22 600(4)(c), since the original FEIS never evaluated the long-term ban on any and all housing  
23 in the STAOD UI zone now proposed in the Greater Duwamish Manufacturing and  
24 Industrial Center Subarea Plan.

### 19 **3. Relief Requested**

20 For the reasons above, Appellants Washington State Major League Baseball Stadium Public Facilities  
21 District and Seattle Building & Construction Trades Council seek an order from the Examiner (a)  
22 finding the City’s adoption of the FEIS and FEIS addendum, to be clearly erroneous and not supported  
23 by law or fact, (b) reversing the City’s adoption of the FEIS and FEIS addendum, and (c) remanding  
24 the matter to the Seattle Office of Planning and Community Development for further environmental  
25 review under SEPA to cure the deficiencies outlined above.  
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Dated this 28<sup>th</sup> day of May, 2026.

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Major League Baseball Stadium Public  
Facilities District and Seattle Building &  
Construction Trades Council*

# ATTACHMENT A



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**NOTICE OF ADOPTION OF FINAL ENVIRONMENTAL IMPACT STATEMENT (FEIS)  
AND ISSUANCE OF FEIS ADDENDUM FOR THE GREATER DUWAMISH  
MANUFACTURING AND INDUSTRIAL CENTER (MIC) SUBAREA PLAN**

**Pursuant to SMC 25.05.600 and WAC 197-11-600**

**Proposal:** The City of Seattle Office of Planning and Community Development (OPCD) proposes to adopt the Greater Duwamish Manufacturing and Industrial Center Subarea Plan as a section of the Seattle Comprehensive Plan and is adopting the Final Environmental Impact Statement for the Industrial and Maritime Strategy and issuing a FEIS addendum pursuant to the State Environmental Policy Act.

The Greater Duwamish MIC subarea plan is a nonproject action that advances the goals and policies set out as part of the Industrial and Maritime Strategy and the Seattle Comprehensive Plan with specific additional policy guidance for the Greater Duwamish MIC. The Subarea Plan does not alter or amend the Comprehensive Plan's growth strategy, land use designations, or adopted growth targets.

**Adoption of FEIS:** On September 29, 2022, OPCD issued a FEIS for the proposed Industrial and Maritime Strategy ("Industrial and Maritime Strategy EIS"). The Industrial and Maritime Strategy was a multi-year process that updated plans, policies, and regulations relating to industrial land use in the City of Seattle. The Industrial and Maritime Strategy FEIS considers the impacts of three action alternatives and one preferred action alternative on the built and natural environment, identifies mitigation strategies, and summarizes whether there are significant unavoidable adverse impacts.

OPCD has reviewed the proposed Greater Duwamish Manufacturing and Industrial Subarea Plan and the Industrial and Maritime Strategy FEIS. The Industrial and Maritime Strategy FEIS, along with the addendum being issued, meets OPCD's environmental review standards and needs for this proposal.

**Study Area:** The proposal addresses all land within the Greater Duwamish Manufacturing and Industrial Center.

**Addendum:** Pursuant to SMC 25.05.600, OPCD issues this FEIS addendum to provide additional information and analysis that does not substantially change the analysis of significant impacts and alternatives in the Industrial and Maritime FEIS. Preparation of an EIS addendum is appropriate here because it considers the potential impacts of the Subarea Plan on the built and natural environment. - OPCD finds that adoption of the Subarea Plan is also appropriate because it falls within the range of impacts analyzed in the Industrial and Maritime Strategy FEIS and there are no new significant adverse impacts associated with the Subarea plan that were not already discussed and considered in the FEIS.

**Timing of Implementation:** The City Council is considering adopting the Greater Duwamish Manufacturing and Industrial Subarea Plan into the Comprehensive Plan in late summer or early fall of 2026.

**How to Comment/Comment Period:** Comments on this FEIS addendum may be submitted to [Jim.Holmes@Seattle.gov](mailto:Jim.Holmes@Seattle.gov) by 5PM on May 28, 2026.

**Appeals:** The proposal to adopt the Greater Duwamish Manufacturing and Industrial Center Subarea Plan is a non-project action. A SEPA FEIS addendum is not subject to administrative appeal.

To appeal adoption of the FEIS, an appeal to the City's Hearing Examiner must be sent in writing. Appeals may be filed online at [www.seattle.gov/examiner/efile.htm](http://www.seattle.gov/examiner/efile.htm), or mailed to the City of Seattle Hearing Examiner, P.O. Box 94729, Seattle, WA 98124-4729. Appeals must be received prior to 5:00 P.M. on May 28, 2026 and be accompanied by a \$120.00 filing fee. The fee may be paid by check payable to the City of Seattle or a credit/debit card (Visa and MasterCard only) or payment by telephone at 206-684-0521.

**Information Available:**

Copies of the FEIS Addendum, the FEIS, and the proposed Greater Duwamish Manufacturing and Industrial Center Subarea Plan and other related studies and documents can be found on OPCD's website at:

[www.seattle.gov/opcd/current-projects/industrial-and-maritime-strategy#projectdocuments](http://www.seattle.gov/opcd/current-projects/industrial-and-maritime-strategy#projectdocuments)

If you are unable to access the materials through the sources above, or have questions regarding the proposal, please contact Jim Holmes, Senior Planner, OPCD, at 206-684-8372, or by email at: [jim.holmes@seattle.gov](mailto:jim.holmes@seattle.gov).