



**CITY OF SEATTLE
ANALYSIS AND DECISION OF THE DIRECTOR
OF THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

Project Name: Regulatory Reform Ordinance proposal (Ordinance #1)

Applicant Name: City of Seattle - Department of Planning and Development

Address of Proposal: Certain zones throughout the city as detailed below

SUMMARY OF PROPOSED ACTION

The Department of Planning and Development is proposing to amend the Land Use Code (Title 23) in support of growth consistent with the Comprehensive Plan and economic recovery and stimulus. Amendments would support increased opportunities for entrepreneurial activity, flexibility in future development, and expanded capability for provision of accessory housing. The amendments are summarized as:

1. Address rules for home business entrepreneurship (would apply in single-family, multifamily and other zones where residential use is allowed);
2. Address temporary and intermittent use permitting, including expansion of permissibility of outdoor food vending (in Lowrise 2 and 3 zones in urban centers and light rail station area overlays, and commercial zones where intermittent and temporary uses are allowed);
3. Increase flexibility of permissible uses in Lowrise 2 and 3 zones in urban centers and station area overlays, to allow certain ground-floor commercial uses with size of use limits;
4. Increase flexibility of permissible ground-floor uses in commercial zones along arterials, by allowing more residential uses and consolidating locations where non-residential ground-floor use requirements apply to primarily Pedestrian designated areas;
5. Address rules for accessory dwelling units in single family and multifamily zones, including loosening height restrictions and authorizing detached accessory dwelling units on “through lots;”
6. Accommodate an alternative height measurement technique (currently used in multifamily and commercial zones) for development in the South Lake Union Urban Center;
7. Enable the continued ability to require transportation impact evaluation and mitigation for a particular size range of mixed-use development that would be newly exempted from SEPA environmental review.
8. Increase SEPA environmental review thresholds to higher levels for new residential or mixed-use development that is located in Urban Centers or Station Area overlays, a change that is exempt from review by this SEPA environmental determination.

The following table includes a summary of the proposed amendments:

Amendment Category	Summary of proposed amendments
1. Rules for Home Business Entrepreneurship	<ul style="list-style-type: none"> • Allow for advertising of the home business and its location • Remove a one-per-day delivery limitation, add a two-per-day limitation for heavy vehicle deliveries • Enable home businesses in all accessory structures • Enable interior/exterior alterations for accessory home businesses • Increase allowable number of non-resident employees from 1 to 2 persons • Clarify noise and smoke as types of spillover impacts
2. Temporary and intermittent use permitting	<ul style="list-style-type: none"> • 3-day intermittent uses possible rather than 2-day limit • Most temporary use permits become Type I decisions (non-appealable) instead of Type II (appealable) • Outdoor general sales/services and food/beverage sales allowed in Lowrise 2, 3 zones • Allow signs, with limits, for permitted non-residential uses in Lowrise 2, 3 zones and for permitted outdoor temporary uses
3. Ground-floor commercial uses in Lowrise 2 and 3 zones within Urban Centers, Station Area Overlay District	<ul style="list-style-type: none"> • Define a range of possible permitted ground-floor commercial uses in Lowrise 2, 3 zones that are located in Urban Centers or the Station Area Overlay District • Delete a required 800-foot proximity of ground-floor commercial uses in Midrise or Highrise zones to NC zones
4. Flexibility for ground-floor uses in commercial zones along arterials	<ul style="list-style-type: none"> • Narrow the applicability of rules that require presence of ground-floor commercial uses for commercial-zoned properties along arterials, to apply primarily in areas with Pedestrian overlay zones • Maintain a 13-foot ceiling height requirement even where additional residential uses would be enabled
5. Address rules for accessory dwelling units	<ul style="list-style-type: none"> • Remove a height restriction on detached accessory dwelling units that prohibits such units from being more than 15 feet higher than rooftop height of principal structure • Enable detached accessory dwelling units on “through lots” that have streets on two opposite sides, when one yard may be interpreted as a rear yard • Clarify that accessory dwelling units may occur within townhouse and rowhouse structures and on unit lots, within rules and definitions
6. Enable a different height measurement technique	<ul style="list-style-type: none"> • Enable choice between two height measurement techniques for new developments, to avoid inadvertently restricting building bulk due to localized slope conditions

Amendment Category	Summary of proposed amendments
<p>option for South Lake Union Urban Center</p>	
<p>7. Maintain an ability to require a transportation impact evaluation, for SEPA-exempted projects</p>	<ul style="list-style-type: none"> • Enable the current level of transportation impact evaluation to continue for development proposals that will be exempted from SEPA environmental review • Define flexibility in the types of evaluations required according to development size or complexity • Define range of impact-mitigating conditioning bases

Public Comment

Proposed changes to the Land Use Code require City Council approval. Public comment will be taken on the proposed amendments at a future City Council Public Hearing.

ANALYSIS - SEPA

This proposal is an adoption of legislation, which is defined as a non-project action. This action is not categorically exempt (SMC 25.05.800). A threshold determination is required for any proposal that meets the definition of “action” and is not categorically exempt. Based on SMC 25.05.800.T and WAC 197-11-800(20), the proposed changes to agency SEPA procedures are categorically exempt from this SEPA review, and therefore are not included in the impact analyses in this SEPA Determination.

The disclosure of the potential impacts from this proposal was made in an environmental checklist submitted by the applicant dated July 7, 2011. The information in the checklists, the Director’s Report and Recommendation, other information provided by the applicant, and the experience of the lead agency with review of similar regulations and proposals, form the basis for this analysis and decision.

ELEMENTS OF THE ENVIRONMENT

Adoption of the recommended Code amendments would result in no immediate adverse short-term impacts because the adoption would be a non-project action. The discussion below evaluates the potential for significant long-term adverse environmental impacts that could conceivably occur as a result of the proposed amendments, using a programmatic-level impact evaluation approach meant to disclose potential long-term and cumulative impacts.

The elements of discussion presented below reflect interpretation of the net difference that the proposal’s contents could make on future development/use patterns, and also interpretation of whether the net differences would create added potential for adverse or significant adverse environmental impacts. The discussion highlights what are believed to be the most salient interpretive points about the potential for adverse impacts, but inclusion of these points does not mean they are evaluated as significant adverse impacts. Conclusions regarding the potential for significant adverse impacts are made within each topical discussion and at the end of each subsection.

Natural Environment

Earth, Air Quality, Water (Drainage, Water Quality), Plants and Animals, Environmental Health

Home business entrepreneurship

A wide range of home-based businesses already operate in homes across the city, most of which may be professional, clerical or business services that have no meaningful natural environmental implications because they are conducted indoors. However, a range of current activities may involve indoor business activity oriented to small goods manufacture, auto repair, craftwork or other activities that may use potentially hazardous substances such as oils, paints, sealants, cleaning fluids, etc., and may generate by-products such as leftover fluids, residues, sawdust or other particulates.

Through rule changes that increase flexibility, the proposal would encourage increased activities of this nature, including in accessory structures such as garages, and thus would contribute to incremental increases in potential for spills or improper disposal of hazardous substances, increased potential for air emissions of pollutants, and other forms of spillover impacts. The relatively low estimated frequency in the distribution, scale and types of these activities across the city would probably change only slightly within the context of the entire affected area, but there is a possibility of increased proximity of such activities to one another over time.

Current and amended rules would continue to provide protection against substantial violations that might heavily pollute the natural environment, and neighbors of such activities would continue to be afforded the same level of protection against spillover impacts as today. Complaint-based enforcement undertaken by the City would be able to respond to and minimize the potential extent and duration of spillover impacts.

Temporary/intermittent uses, Ground-floor uses in selected lowrise and commercial zones

An increased presence of temporary uses for food or other vending across additional portions of the city would increase the potential for additional increments of pollutants emitted into the natural environment due to spillage or improper disposal, byproducts of cooking activities or similar effects. If this occurred, it would be expected predominantly to affect air quality and drainage runoff water quality in the immediate vicinity of such activities. Anticipated impacts would likely be isolated and difficult to predict. For example, a given property that might host such activities might be flat and accidental spillage might not make its way to city drainage systems or natural drainages.

Accessory dwelling unit proposals

Enabling accessory dwelling units to be developed in more locations would generate additional potential for construction-related disturbance of earth and drainage systems, potentially affecting localized water quality and urban plant/animal habitats. The latter is more likely where future building sites might locate near greenbelts or other lightly developed vicinities. Future development-specific reviews, if required, would provide the opportunity for requirement of mitigation measures in addition to City development rules, to help avoid or minimize impacts that would vary related to site-specific conditions. Upon occupation, there would be added potential for air emissions and improper disposal of typical household chemicals (and those associated with possible home-based businesses).

Height measurement and transportation study requirements

These proposals have little or no potential to adversely affect the natural environment. To the extent that additional infill development is accommodated, the height measurement technique could indirectly contribute to lesser regional natural environmental impacts by virtue of achieving denser development patterns within Seattle. Therefore, the environmental impact potential from these elements of the proposal is likely to be minimally adverse or positive in nature.

Conclusions regarding natural environmental impact potential: The discussion above suggests that localized environmental impacts associated with newly permitted or expanded uses and activities would be possible, through potential increases in pollutant emissions and additional potential for land-disturbing construction. However, the existing and proposed rules that would affect these potential uses and activities, the relatively small magnitude and potential for such impacts, and the probability of future site-specific development reviews, would provide sufficient controls such that substantial pollutant emissions or disturbances are not anticipated. Therefore, this analysis concludes that minimal-to-minor levels of adverse natural environmental impacts are probable.

Built Environment

Land Use, Relationship to Plans & Policies

The proposal would result in no direct impacts to land use-related elements of the environment because it is a non-project proposal. The proposal would aid in encouraging future development consistent with the intent of Comprehensive Plan policies and growth strategies, by encouraging denser mixed-use land use patterns within urban centers and station area overlay districts. Other implications would include additional possible mixing of commercial uses within heretofore residential-only zones, and additional residential infill development possibilities within low-density residential areas through additional accessory dwelling unit accommodations. While these would be evolutionary steps in the accommodation of different land use patterns through future growth/development, the overall adverse impact implications with respect to land use are not interpreted to be significant nor are they anticipated to result in potential for significant adverse incompatibilities of land use or inconsistencies with the City's planning and policy directions.

The various elements of the proposal would generate differing levels and types of land use impact implications, summarized as follows.

Home business entrepreneurship

The proposal could lead to more entrepreneurial activities in more locations in low-density residential zones. The retention of rules that prohibit spillover impacts on adjacent properties, and prohibitions on most outdoor activities, and limitations on business visits (by appointment only) would minimize the probable potential for adverse compatibility impacts on surroundings. No particular clustering of such entrepreneurial activities is expected, other than a general applicability to primarily single-family residential areas. Additional potential for deliveries by vehicles (with limits on heavy vehicle deliveries) could increase street activity levels, which could be experienced by nearby residents. Activities and uses that would not be consistent with the home occupation rules would continue to be prohibited and subject to enforcement. While

the potential for spillover impacts to occur more frequently would represent an adverse impact of the proposal, this is not interpreted to represent a probable significant adverse impact due to the relatively low frequency of such activities and the mitigating effects that would be provided by the continuation of the home occupation regulations and enforcement.

Temporary/intermittent uses

Additional flexibility for temporary and intermittent uses including food vending would likely lead to more widespread presence of such activities in portions of the city, including most likely in Urban Centers and near station areas. While such outdoor activities and uses could generate relatively minor levels of additional spillover impact potential (such as risk of air emissions or noise annoying nearby residents and greater activity levels in various locations), these are not interpreted to have significant adverse land use impact potential. This is due to the relatively minor magnitude of such potential impacts and the probable effectiveness of enforcement actions if complaints are made. To the extent that spillover noise or other effects might be possible, such uses and activities would be subject to compliance with City noise limits and other rules, and enforcement actions if complaints are received. Other effects, such as the potential for increased competition with permanent businesses nearby, might occur but are not identified as significant adverse types of land use impacts.

Ground-floor uses in selected lowrise and commercial zones

Additional flexibility for ground-floor commercial uses to locate in Lowrise 2 and 3 zones in Urban Centers and station area overlays would increase the diversity of use mixes in these zones, with an added potential for spillover impacts related to noise and activity upon other residents nearby on or off the properties where these uses would be present. These spillover impacts, if they occurred, would be subject to compliance with City noise limits and other rules, and enforcement actions if complaints are received.

This type of added flexibility of land use mix is not anticipated to create significant incompatibilities of land use – adverse spillover impacts only rarely occur in other zones where mixing of uses is allowed, and in fact the mixing of uses is a hallmark of healthy, vital urban districts in Seattle and other cities. The intent to foster denser mixes of uses in urban centers and other growth districts is a key strategy for Seattle’s Comprehensive Plan and regional growth management efforts, by which larger-scale development impacts across the region are avoided or lessened by growing more efficiently in cities, and greater neighborhood vitality is achieved.

The proposal to accommodate increased presence of residential uses in ground floors of uses in commercial zones could generate some added potential for complaints brought about by proximity of residential and commercial uses. However, DPD’s experience in monitoring Seattle’s development patterns over the past 15 years does not suggest that significant adverse impacts of incompatible land uses are likely to occur. Rather, the typical non-residential uses present in ground floors of mixed use developments are predominantly closed in evening hours, or provide local commercial retail services, or are otherwise small-scale operations with a low probability of generating substantial conflicts with residential uses. Where conflicts might occur, for example complaints due to proximity of a residential use to a noisy restaurant, a range of probable enforcement actions could be taken in a manner meant to resolve any violation that might occur.

Accessory dwelling unit proposals

Accommodating more development of detached accessory dwelling units (DADUs) would result in a denser use pattern with a greater residential presence in areas that are generally low-density and single-family in nature. On “through lots” the proposal would allow for construction of DADUs in yards that would be identifiable as rear yards but that nonetheless also could have direct visual exposure to nearby public streets.

Some DADUs could be enabled in locations where they would be more visually noticeable than other DADUs built to date, due to a relaxing of a regulatory height limit that is in relation to the existing residential structure, and accommodation of DADUs on through lots. Therefore, additional residential development accommodated by the proposal could result in visually noticeable additions of new dwelling units to low-density neighborhoods. This would represent a probable adverse type of land use impact but it is not interpreted to be a significant adverse land use impact because, in part, the residential character and low-density character of any given neighborhood district as a whole is not likely to be compromised by the intermittent addition of more DADU residences over time. Predominant development patterns in any given neighborhood are still likely to remain compatible, visually and in terms of land use patterns, with a typical low-density residential character.

Height measurement and Transportation study requirements

The proposal for developers to have the option to use an alternative height measurement technique in South Lake Union could potentially accommodate additional building bulk in upper levels of future development. Differences in building bulk if the proposed technique is used would be relatively subtle, but may accommodate more building bulk in upper levels than existing measurement techniques, because the existing technique causes more bulk at lower levels to be counted within permissible densities thus reducing the total floor area that can be provided in upper levels. This potential effect is most apparent on sloping sites. Due to the probable effects on building bulk massing, a change that allows use of an alternative measurement technique would represent an adverse land use/environmental impact, but it would not represent a significant adverse impact due to the probable minor magnitude of difference and the probable positive effects on building design and height/bulk/scale shaping that would occur through typical design review processes.

The transportation study requirement would not be expected to generate any adverse land use impact potential, due to a minimal relationship to land use factors and this requirement’s proposed intent to maintain a status quo regarding transportation studies for future development.

Conclusions regarding land use environmental impact potential: The proposal, including its various elements, would generate a range of potential environmental impacts that would be adverse but are not interpreted to be probable significant adverse impacts, due to their relative magnitude and the probability of effective enforcement. Spillover impacts, such as noise, air emissions and similar effects could occur as a result of additional future home business entrepreneurship, additional outdoor/temporary use presence, and additional presence of commercial uses at ground floor. Typical construction and post-construction impacts related to construction noise and human occupation would likely occur with additional detached accessory dwelling units. However, such impacts would not be likely to result in significant adverse

impacts upon land use compatibility or the character of affected areas, and the proposal would be consistent with the intent of the city's Comprehensive Plan and other policies that advocate for denser growth in Urban Centers, in greater proximity to areas best served by transit, and other areas of the city.

Public View Protection, Shadows on Open Spaces, Historic Preservation

Home business entrepreneurship, Temporary/intermittent uses, Ground-floor uses in selected lowrise and commercial zones

Due to their nature, these portions of the proposal would have a low probability of generating any adverse impacts in relation to these elements of the environment. They could affect future development activities within properties but would have little or no relationship to creating adverse impacts related to public viewpoint blockage toward scenic features, scenic routes, views toward the Space Needle, or landmarks. To the extent that future development affected by the proposal might occur on a property that might generate shadow impacts on public open spaces, view or historic/cultural landmark-related adverse impacts, such future development proposals could be subject to SEPA review and/or design review processes, and would be subject to the protective policies and regulations in the City's codes addressing historic/cultural landmarks and potential enforcement if violations occur.

Accessory dwelling unit proposals

This proposal would have a low probability of generating changes in the visual environment affecting public protected views, generating shadow impacts, or located near historic landmarks. While no such impacts can be confirmed as probable, it cannot be ruled out that future development of accessory dwelling units might occur on a property with a relationship to views, open spaces or landmarks. If near a landmark, City policy and regulation could be cited to effectively avoid or minimize impacts to a landmark. If near or within a publicly protected view, the likelihood of significant adverse impacts to the view itself would be low because most public viewpoints are located on high points, on public lands and/or directed toward broad scenic vistas of water, mountains and territorial views. A review of a Seattle views inventory document supports this analysis.

Height measurement

The proposed option of a different height measurement technique could alter future building bulk arrangements on properties in South Lake Union. As such, it could conceivably contribute toward slight increases in impact potential related to shadows on public spaces, relationship to landmarks, and/or relationship to scenic routes such as Fairview Avenue. While the probable effects on bulk could be subtle, they could result in slightly more bulk potential in upper floors of buildings. Design review and other reviews such as those related to landmark relationships would be expected to identify and avoid potential adverse-impact outcomes of these types.

Transportation study requirements

The transportation study requirement would not be expected to generate any adverse impact potential, due to a minimal relationship to these elements and this requirement's proposed intent to maintain a status quo regarding transportation studies for future development.

Conclusions regarding environmental impact potential: The proposal would generate minimal or low-probability potential for adverse environmental impacts with regard to impacts on public views, shadows on public open spaces, and historic landmarks.

Noise, Light/Glare

Home business entrepreneurship

The proposal would generate a minor potential for additional noise and light/glare impacts, due to a potentially more widespread incidence of home-based business activity. This would likely occur in a widely-distributed pattern across the city, and not likely grouped in any particularly adverse manner. The proposal could lead to an increased level of business entrepreneurship in homes across the city, some of which would be expected to occur in accessory structures such as stand-alone garages. Such entrepreneurial activities, in any structure, could generate additional noise that could annoy neighboring residents, despite the rule that prohibits such spillover impacts. The impact potential would depend upon the nature of the activity; those involving physical processes such as building or reconditioning things could generate more noise than professional or clerical work. Rules governing home occupations would continue to provide protection against substantial noise and light/glare violations, and neighbors of such activities would continue to be afforded the same level of protection against spillover noise and light/glare impacts as today. Essentially, complaint-based enforcement undertaken by the City would respond to and minimize the potential for adverse spillover impacts.

Temporary/intermittent uses

Accommodating additional outdoor entrepreneurial activity in the form of temporary food vending uses or similar vending activities on properties would generate a minor potential for additional adverse noise impacts where such activities could occur. This would include on private properties in commercial zones and selected multifamily Lowrise zones located in Urban Centers or station area overlay districts. In many cases, these areas are already subject to noise generated by typical daily commercial activities and are typically in or near local business districts or strip commercial areas, factors which mean that existing ambient noise levels tend to have a masking effect on small-scale noise generation. As an activity assumed to occur predominantly during daytime hours, on a small-scale and temporary basis, the probability of significant adverse impacts due to such activity would be minor. All such activities would be subject to the City's noise rules that are lowered in nighttime hours such that generation of substantial noise would not be permissible, and instances of violations would be enforceable on a complaint basis as they are today.

Ground-floor uses in selected lowrise and commercial zones

Accommodating business activity in selected lowrise multifamily zones in Urban Centers or station area overlay districts would generate a minor potential for additional adverse noise impacts. Ground-floor commercial uses, such as restaurants and other retail uses could generate adverse noise that could be experienced within existing residences nearby or potentially within new residences in the same building. All such activities would be subject to the City's noise rules that are lowered in nighttime hours such that generation of substantial noise would not be permissible, and instances of violations would be enforceable on a complaint basis as they are today.

The proposed ability to accommodate more residential presence in ground floors of commercial zones conceivably could contribute to circumstances where new residents would be exposed to adverse noise levels from nearby commercial activities either from adjacent properties or within the same property. Similar juxtapositions of uses are possible today, with a relatively infrequent record of noise complaints. Therefore, this proposal is interpreted as creating only a minor potential for adverse noise impacts.

Accessory dwelling unit proposals

The accommodation of new accessory dwelling units on more properties would generate additional potential for construction noise or resident-generated noise that could annoy nearby residents. Such impacts would be adverse, would range from minimal to moderate, and would depend upon factors such as topography, and positioning of structures and access routes. However, new dwellings would be subject to compliance with the City's noise regulations. To the extent that inappropriate noise levels would be generated by any resident in an existing or newly developed building, enforcement action would be possible using relatively stringent nighttime noise limits, for example, which would address the most sensitive time of day relative to noise. Thus, significant adverse noise impacts as a result of additional presence of accessory dwellings are not anticipated.

Height measurement and Transportation study requirements

The allowance for an alternative height measurement technique could potentially result in development of new buildings in South Lake Union with slightly more usable area than if current height measurement techniques were used. This might generate a slight increase in potential for noise and light/glare impacts from any given site, but the probable magnitude of those adverse impacts would be minor and incidental. The proposal to require transportation studies for certain sized projects does not generate noise impact concerns.

Conclusions regarding environmental impact potential: The discussion above suggests that localized noise impacts associated with newly permitted or expanded uses and activities would be possible but relatively minor to moderate in potential magnitude, and subject to enforcement of City noise rules that would effectively minimize significant impact potential.

Transportation, Parking

The proposal would result in no direct impacts to transportation or public services or utilities because it is a non-project proposal. The proposal would aid in encouraging future development consistent with the intent of Comprehensive Plan policies and growth strategies, by encouraging denser mixed-use patterns within Urban Centers and station area overlay districts, as well as greater reliance upon transit systems and lesser reliance upon single-occupant vehicles. This would also support the City's transportation-related policy directions.

Future development may contribute to higher volumes of vehicle traffic in all of these Urban Centers or station area overlay districts, depending upon how automobile-reliant future new residents and employees would be. However, future development in Urban Centers, station areas, urban villages and other similar transit-accessible areas would also increase proximity to frequent transit service, and thus the probability that future residents will use transit service more frequently, on a per capita basis. The proposal would also increase the probable proximity of local-serving businesses and services to city residents, which may lead to substitution of vehicle trips with pedestrian or bicycle trips instead.

The various elements of the proposal would generate differing levels and types of potential transportation impacts, summarized as follows.

Home business entrepreneurship

To the extent that additional home entrepreneurship is encouraged and some such businesses need additional regular vehicle deliveries or attract a regular flow of customers by appointment, some low-density residential areas could experience increases in vehicle trip volumes. This could vary widely from 1 to 5 vehicles per day, likely up to approximately 25 to 35 vehicles per day in the worst case, as a result of a given home entrepreneur's business. The relative impacts on a given area could vary depending upon the characteristics of the street, e.g., narrower streets potentially could experience more impacts of traffic congestion than wider streets. Recognizing that context and characteristics of individual streets can make a difference in interpretation of adverse traffic and parking impacts, the proposed rules retain a provision that prohibits substantial on-street parking congestion and substantial increases in traffic. This would allow complaint-based enforcement to mitigate problems if the characteristics of a given home business situation result in severe or disruptive levels of traffic or parking impacts.

Temporary/intermittent uses

The proposed accommodation of temporary and intermittent uses, including uses such as outdoor food vending on private property, would likely generate additional vehicle traffic to areas where such uses would occur. Patterns of such activity could range from limited busy periods such as lunch or dinner time "rushes" to the attraction of small but steady volumes of visitors. In the worst case, traffic volumes and parking volumes generated by a popular use might cause localized congestion and increased traffic levels during some parts of a typical day. Where located along or near established commercial districts, such patterns would not be expected to generate significant adverse transportation impacts upon the area (due to the nature of existing use and activity patterns) although some spillover traffic/parking effects on the closest residential streets would be possible.

The proposal would also accommodate such activities within Lowrise 2 and 3 zones that are in Urban Centers and station areas. For a very popular use that would generate many visitors on a regular basis, the localized transportation and activity impacts could be more noticeable and potentially more adverse if local streets are narrower. However, much would depend upon the nature of the activity. A relatively incidental outdoor sales activity, such as a single food cart or other product sales cart, would not be expected to generate meaningful additional adverse traffic potential, and could be interpreted as an accessory activity that complements another business and adds slightly to its traffic generation.

Ground-floor uses in selected lowrise and commercial zones

Similar to the evaluation for temporary and intermittent uses, the accommodation of commercial uses into ground floors of buildings in LR2 and LR3 zones would generate additional potential for adverse traffic and/or parking impacts on local streets depending upon the nature of the use. While it is possible that on-site parking could be provided to serve business customers, such parking would not be required. This is not interpreted to represent a probable significant adverse impact due to a relatively low probability that ground-floor uses would become so popular as to generate substantial on-street traffic or parking impacts, and due to this proposal only applying to Urban Centers and station areas where more activity and density of use is already expected.

Another part of the proposal, the increased accommodation of residential uses at ground floor of buildings in commercial zones, could encourage future development that would generate additional traffic in an area. However, such development patterns would likely represent a buildout potential with lesser traffic/parking impacts than would a pattern with more commercial uses. This is because many commercial uses would be assumed to generate higher vehicle traffic volumes per square foot of floor area than residential uses. In practice, this proposal is likely to only result in added residential presence in some cases rather than to the maximum extent possible under the code. This would tend to limit the potential for adverse traffic/parking impacts.

Accessory dwelling unit proposals

The potential for adverse transportation impacts from additional accessory dwelling units accommodated by the proposal would be slight to minor. The probable pattern would be a gradual and widely distributed addition of accessory dwelling units over time. This would limit the effects on any given neighborhood and mean only a slight increase in potential new traffic due to new residential units, in a manner similar to traffic generated by other low-density existing residential units.

Height measurement and Transportation study requirements

The proposed alternative height measurement technique for South Lake Union could make a difference in allowing slightly more usable floor area to be achieved on some properties. This would generate a slightly increased potential for additional traffic generation, which would represent a probable adverse but not significant adverse impact potential, due to its relative magnitude in comparison to existing development. To the extent that such additional area is developed, it would be subject to voluntary traffic mitigation contribution options, or other traffic mitigation techniques when reviewed as a development proposal.

The continued ability to require transportation impact evaluations for a particular size range of mixed-use development would not be anticipated to generate adverse transportation impacts. This essentially would maintain existing development evaluation practices that help ensure that significant traffic impacts, if identified, are appropriately mitigated in a proportional manner.

Conclusions regarding environmental impact potential: Each element of the proposal would generate additional potential for adverse transportation impacts with future development or activities, in terms of additional probable traffic volumes generated by new uses, and the potential for added congestion or similar spillover impacts. Such impacts due to home businesses and temporary/intermittent uses could occur on narrower local streets, which could contribute to the degree of impacts experienced.

In some cases, such as for accessory dwelling unit accommodations, the potential degree of adverse impact would be minimal.

Public Services, Utilities

Over the long-term, the cumulative effect of the proposal on provision of public services and utilities is likely to avoid significant adverse impacts and could even generate positive impacts in a regional or citywide context, through encouragement of more efficient clustering of development in areas already served by city utilities and public services. While utility conditions

