

**CITY OF SEATTLE
SEPA ENVIRONMENTAL CHECKLIST**

A. BACKGROUND

1. Name of proposed project, if applicable:

Reg Reform Ordinance (Ordinance #1)

2. Name of applicant:

City of Seattle, Dept. of Planning and Development

3. Address and phone number of applicant and contact person:

Applicant's Contact: Gordon Clowers, Planning and Developmt. Specialist II
(206) 684-8375

Department of Planning and Development
700 5th Avenue, Suite 2000
PO Box 34019
Seattle, Washington 98124-4019

4. Date checklist prepared:

July 7, 2011

5. Agency requesting checklist:

City of Seattle, Department of Planning and Development

6. Proposed timing or schedule (including phasing, if applicable):

Approval by Seattle City Council and Mayor in 3rd-4th quarter 2011

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

No.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

None, except for the SEPA determination associated with this proposal.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

This non-project proposal affects a wide variety of properties throughout the city, and some pending decisions on affected properties are possible but have no known bearing on this proposal.

10. List any government approvals or permits that will be needed for your proposal, if known.

Mayor and Seattle City Council approval

11. Give brief, complete description of your proposal, including the proposed uses and the site of the project. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The Department of Planning and Development is proposing to amend the Land Use Code (Title 23) and Environmental Policies and Procedures (Title 25) 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.

- 12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.**

The proposal includes changes that would affect certain zones within the city (as described in the response to question #11 above), including a number of provisions that would affect the designated Urban Centers and Station Area Overlay Districts near light rail stations.

B. ENVIRONMENTAL ELEMENTS

1. Earth

- a. General description of the site (circle one):
Flat, rolling, hilly, steep slopes, mountainous, other:**

Seattle's topography encompasses a full range of flat and hilly areas.

- b. What is the steepest slope on the site (approximate percent slope)?**

Hilly edges throughout the city range above 40% in a number of locations.

- c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.**

A wide variety of soil types and classifications are present throughout the city, including glacial tills, sands, clays, gravels and varied mixes of these soil types.

- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.**

Unstable soils throughout the city are predominantly mapped by the city's critical area maps.

- e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.**

None is proposed in relation to the recommended non-project actions.

- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.**

No. The proposal is non-project in nature. See section D of this checklist for additional commentary. Individual projects that may utilize the provisions of this proposal will be subject to additional environmental review if they meet or exceed thresholds for environmental review.

- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?**

The affected area is not a single development site, and the proposal is non-project in nature.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

None proposed. Individual projects that may utilize the provisions of this proposal will be subject to additional environmental review if they meet or exceed thresholds for environmental review.

2. Air

a. What type of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.

None for this non-project proposal; see section D.1 of this checklist for more commentary.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

No.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

None proposed.

3. Water

a. Surface:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

There are numerous water bodies in and around the city. There is not a single site for this non-project proposal.

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

No.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and

indicate the area of the site that would be affected. Indicate the source of fill material.

None identified for this non-project proposal. See Section D of this checklist for additional commentary.

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.**

No.

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.**

No.

- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

No. See Section D of this checklist for additional commentary. Individual projects that may utilize the provisions of this proposal will be subject to additional environmental review if they meet or exceed thresholds for environmental review.

b. Ground:

- 1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.**

No. This is a non-project proposal. See section D of this checklist for any discussion of groundwater relationships.

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals ...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

Not applicable. This is a non-project proposal. See section D of this checklist.

c. Water Runoff (including storm water):

- 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow**

into other waters? If so, describe.

Not applicable. This is a non-project proposal.

2) Could waste materials enter ground or surface waters? If so, generally describe.

No. This is a non-project proposal. See section D of this checklist.

d. Proposed measures to reduce or control surface, ground, or runoff water impacts, if any:

None proposed.

4. Plants

a. Check or circle types of vegetation found on the site:

- deciduous tree: alder, maple, aspen, other
- evergreen tree: fir, cedar, pine, other
- shrubs
- grass
- pasture
- crop or grain
- wet soil plants: cattail, buttercup, bulrush, skunk-cabbage, other
- water plants: water lily, eelgrass, milfoil, other
- other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

None. This is a non-project proposal. See section D of this checklist.

c. List threatened or endangered species known to be on or near the site.

This is a non-project proposal. See section D of this checklist.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

None.

5. Animals

a. Circle any birds and animals that have been observed on or near the site or are known to be on or near the site:

This is a non-project proposal. See section D of this checklist.

birds: hawk, heron, eagle, songbirds, **other:**

X Typical songbirds, hawks, etc. present in Seattle possibly including eagles.

mammals: deer, bear, elk, beaver, **other:** squirrels

X Typical range of mammals as present in Seattle and its stream vicinities.

fish: bass, salmon, trout, herring, shellfish, **other:**

None.

- b. List any threatened or endangered species known to be on or near the site.**

This is a non-project proposal. See section D of this checklist.

- c. Is the site part of a migration route?**

This is a non-project proposal. See section D of this checklist.

- d. Proposed measures to preserve or enhance wildlife, if any:**

None proposed

6. Energy and Natural Resources

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.**

A full range of available energy types could be used with future development that might be affected by this non-project proposal.

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.**

This is a non-project proposal. See section D of this checklist. Individual projects that may utilize the provisions of this proposal will be subject to additional environmental review if they meet or exceed thresholds for environmental review.

- c. What kinds of energy conservation features are included in the plans of this proposal?**

None. This is a non-project proposal.

List other proposed measures to reduce or control energy impacts, if any:

None proposed.

7. Environmental Health

- a. **Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.**

None identified for this non-project proposal. See section D of this checklist.

- 1) **Describe special emergency services that might be required.**

None identified.

- 2) **Proposed measures to reduce or control environmental health hazards, if any:**

None identified.

b. Noise

- 1) **What types of noise exist in the area which may affect your project (for example: traffic, equipment operation, other)?**

This is a non-project proposal; thus area noise would not affect a particular project site. Noise exposure varies in different parts of the city, from traffic and typical commercial activity noises in commercial areas, to industrial noises, to less-intensive noise environments in many residential environments across the city.

- 2) **What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from site.**

This is a non-project proposal. Elements of the proposal addressing accommodation of ground-floor and outdoor commercial uses, accessory dwelling units and home occupations, could generate added noise in different parts of the city, over the long-term. See section D of the checklist for other commentary. Individual uses or developments that may utilize the provisions of this proposal will be subject to additional environmental review if they meet or exceed thresholds for environmental review.

- 3) **Proposed measures to reduce or control noise impacts, if any:**

None proposed.

8. Land and Shoreline Use

a. What is the current use of the site and adjacent properties?

The proposal relates to most zones across the city, encompassing a full range of land uses. See section D of this checklist.

b. Has the site been used for agriculture? If so, describe.

This is a non-project proposal relating to most zones across the city. Some agricultural use was present in the city in the distant past.

c. Describe any structures on the site.

This non-project proposal relates to most zones across the city, encompassing the full range of structure types within the city. See section D of this checklist.

d. Will any structures be demolished? If so, what?

No. This is a non-project proposal.

e. What is the current zoning classification of the site?

This non-project proposal relates to most zones across the city. See section D of this checklist.

f. What is the current comprehensive plan designation of the site?

This non-project proposal relates to most zones across the city. See section D of this checklist. All of the affected area is designated Urban. A number of the proposal's elements address changes that would affect the Urban Centers and Station Area Overlay Districts.

g. If applicable, what is the current shoreline master program designation of the site?

This non-project proposal relates to most zones across the city, but is not intended to affect shoreline master program designations or rules.

h. Has any part of the site been classified as an "environmentally sensitive" area?

This non-project proposal relates to most zones across the city. See section D of this checklist for additional commentary.

i. Approximately how many people would reside or work in the completed project?

This non-project proposal relates to most zones across the city, rather

than a particular project site. See section D of this checklist

j. Approximately how many people would the completed project displace?

None identified. This non-project proposal relates to most zones across the city, rather than a particular project site. See section D of this checklist.

k. Proposed measures to avoid or reduce displacement impacts, if any:

None proposed.

l. Proposed measures to ensure the proposal is compatible with existing and project land uses and plans, if any:

None proposed. See section D of this checklist.

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

None. This is a non-project proposal.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

None. This is a non-project proposal.

c. Proposed measures to reduce or control housing impacts, if any:

None proposed.

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

No structures are proposed. This is a non-project proposal.

b. What views in the immediate vicinity would be altered or obstructed?

None known; this is a non-project proposal.

c. Proposed measures to reduce or control aesthetic impacts, if any:

None proposed.

11. Light and Glare

- a. **What type of light or glare will the proposal produce? What time of day would it mainly occur?**

This is a non-project proposal with no direct light/glare impacts. Future uses relevant to the rules addressed in this proposal could influence light and glare generation.

- b. **Could light or glare from the finished project be a safety hazard or interfere with views?**

This is a non-project proposal with no direct light/glare impacts. Future uses relevant to the rules addressed in this proposal could influence light and glare generation, but would not be anticipated to generate safety hazards or view interference.

- c. **What existing off-site sources of light or glare may affect your proposal?**

None known.

- d. **Proposed measures to reduce or control light and glare impacts, if any.**

None proposed.

12. Recreation

- a. **What designated and informal recreational opportunities are in the immediate vicinity?**

None identified. This is a non-project proposal affecting most zones in the city.

- b. **Would the proposed project displace any existing recreational uses? If so, describe.**

No. This is a non-project proposal.

- c. **Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:**

None proposed.

13. Historic and Cultural Preservation

- a. **Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or**

next to the site?

None known, other than the citywide inventory of landmarks; this is a non-project proposal affecting properties across the city. It does not particularly address landmarks or historic/cultural sensitive sites, and existing rules regulating such sites would not be anticipated to be affected by the proposal.

- b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.**

See the response to question #13a above.

- c. Proposed measures to reduce or control impacts, if any.**

None proposed.

14 . Transportation

- a. Identify public streets and highways serving the site, and describe the proposed access to the existing street system. Show on site plans, if any.**

This is a non-project proposal; the affected area is served by the entire street/highway network in the city.

- b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?**

Yes, the entire city is served by public transit.

- c. How many parking spaces would the completed project have? How many would the project eliminate?**

This is a non-project proposal rather than a single-site development proposal. Individual future development projects that may be affected by regulatory provisions of this proposal will be subject to additional environmental review if they meet or exceed thresholds for environmental review.

- d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private):**

No. This is a non-project proposal. No new roads or street improvements are anticipated to be needed as a result of this proposal. See section D of this checklist.

- e. Will the project use (or occur in the immediate vicinity of) water,**

rail, or air transportation? If so, generally describe.

No. This is a non-project proposal. See section D of this checklist.

- f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.**

This is a non-project proposal. See section D of this checklist.

- g. Proposed measures to reduce or control transportation impacts, if any.**

None proposed.

15. Public Services

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.**

This is a non-project proposal that could indirectly lead to future development that would increase the need for public services. See section D of this checklist.

- b. Proposed measures to reduce or control direct impacts on public services, if any.**

None proposed.

16. Utilities

- a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other.**

All utilities are available, in varying degrees, across the city. This is a non-project proposal.

- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in immediate vicinity which might be needed.**

None proposed. This is a non-project proposal.

C. Signature

The above answers are true and complete to the best of my knowledge. I

understand the lead agency is relying on them to make its decision.

Signature:

Date

Submitted: _____

This checklist was reviewed by: _____

William K. Mills, Senior Land Use Planner, Department of Planning and
Development

Any comments or changes made by the Department are entered in the body of
the checklist and contain the initials of the reviewer.

**D. SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS
(Do not use this sheet for project actions)**

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

This non-project proposal would result in no direct impacts with respect to water, air, toxic/hazardous substances or noise as it would not directly result in future development of any particular property.

The proposal's potential to generate adverse impacts of these kinds is minor. Elements of the proposal would accommodate additional commercial activities and development in portions of the city, and additional residential development, which could generate additional noise, air emissions, water discharges and toxic/hazardous substance storage and potential for accidental release. Consistent with the proposal's amendments, such activities might occur in a more widespread fashion across the city than under today's rules, with added potential for increased proximity of commercial uses and activities to residences.

At the same time, most or all of these additional activities accommodated through the proposal would be small-scale and site-specific in nature with only a minor and incidental potential to cause air, water and toxic emissions. Examples of effects might include spills or washout of waste fluids onto private properties or into stormdrains, and air emissions such as exhaust from cooking food that might disperse in the direction of adjacent properties. Potential discharges to stormwater and drainage systems would also be possible to the extent the proposal would encourage future development of additional detached accessory dwelling units within low-density residential areas, due to construction impacts of ground disturbance and drainage, and post-construction potential for runoff from roofs, patios and driveways.

Potential for added noise production would vary among the additional possible uses and activities. If new home entrepreneurship is stimulated by the changes in rules, more business/entrepreneurial activities could occur in accessory structures or main structures on residential properties, and the pattern of home entrepreneurship activity could become more widespread across the city, as indirectly encouraged by the proposal. At the same time, such activities would continue to be subject to rules that prohibit spillover impacts on adjacent properties, including noise among many other possible side effects, and would be subject to enforcement if unauthorized activities occur and complaints about impacts are made. Additional commercial activities, at the ground floor and/or in outdoor areas, could generate additional noise in portions of the city, such as in

Urban Centers and station area overlay districts in commercial zones and in Lowrise 2 or 3 zones. These activities would also be subject to the City's rules addressing noise limits in daytime and nighttime hours. The latter limits are relatively stringent, such that the probability of long-term noise impacts during the most sensitive periods is low and subject to enforcement on a complaint basis. To the extent that additional traffic or vehicle circulation may be generated, such traffic could generate additional noise. Additional possible development and presence of accessory dwelling units in more properties across the city would generate the potential for added construction noise and post-construction noise due to occupation of dwelling units.

Proposed measures to avoid or reduce such increases are:

None proposed. The proposal and the City's codes and policies include provisions meant to define rules, limits and enforcement in a manner that would help avoid, minimize or mitigate impacts of the proposal.

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

This non-project proposal would result in no direct impacts with respect to plants, animals, fish or marine life, as it would not involve development of the affected properties. Also, the potential for impacts on these resources from net potentially increased levels of future development (directly or indirectly encouraged by the proposal) is minimal due to their limited probable presence in affected areas. Seattle has many micro-habitat areas and edges such as shorelines and greenbelts that afford the best urban plant and animal habitats, and many portions of its neighborhoods may also be suitable for urban-adapted wildlife. To the extent that the proposal might generate net positive effects on plant/animal habitat, it could concentrate additional growth in urbanized areas such as Urban Centers, which could reduce or delay further potential development elsewhere in the city or in the region where there is available higher-quality habitat. The proposal to accommodate more frequent presence of accessory dwelling units in more low-density residential properties would counter these net effects to some degree, in that more areas in or near edges of green spaces could be developed. This would remove or replace backyard open spaces suited to some urban wildlife use with more residentially-occupied spaces. This would represent a potential adverse impact to plant/animal habitat. However, these are not interpreted to represent significant adverse impacts of plants/animals or fish or marine life due to this proposal, due to a relatively limited magnitude of change, limited extent of change, and limited presence of high-quality plant/animal habitat that might be affected.

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

None proposed.

3. How would the proposal be likely to deplete energy or natural resources?

The non-project proposal would result in no direct impacts on these resources as it would not involve development or consumption of energy or natural resources. If the proposal indirectly leads to additional development or a faster pace of future development, it could lead to incremental additions to energy/natural resource depletion. However, this would likely be offset over the long-term by the probable concentrating effects of the proposal on future development, near areas with good transit service. This concentration and focus of regional and in-city growth patterns in Seattle would likely lead to substantive region-wide and Seattle-wide improvements in overall energy efficiency, leading to tremendous levels of avoided energy consumption for travel alone. Per capita energy consumption for construction of housing and other structures and for residency would also likely be substantively less than if housing was instead provided in more far-flung locations regionally. Such effects would be consistent with the directions and policies of the Seattle Comprehensive Plan and regional growth management planning.

Proposed measures to protect or conserve energy and natural resources are:

None proposed, other than compliance with City rules and policies that would apply to future development to avoid impacts on protected natural resources.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

The proposal would result in no direct impacts to environmentally critical areas or the other listed types of environmentally sensitive features as it would not involve development of properties with these resources. Also, the indirect potential impacts of the proposal are not likely to differentially affect any of these particular resources, of which historic/cultural resources and wetlands would be the most frequent or these resources present across the city. Current City and State rules governing wetlands and historic/cultural resources would continue to apply. This means that while historic/cultural sites and wetlands or floodplains could conceivably be present on properties that are affected in some way by this proposal, the probable effects of the proposal are not likely to induce more rapid development in a manner that would harm or eliminate these resources.

Proposed measures to protect such resources or to avoid or reduce impacts are:

Adherence to current City of Seattle rules and regulations that pertain to environmentally critical areas would be required of future development.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

The proposal would result in no direct impacts to land and shoreline use as 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. Other implications would include additional possible mixing of commercial uses in 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 in a programmatic-level analysis as follows.

1. Home business entrepreneurship: additional accommodation of such business activities in accessory structures, allowance for an additional non-resident employee, and other changes to advertising and remodeling rules 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 activity levels on streets that 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.
2. Additional flexibility for temporary and intermittent uses including food vending would likely lead to more widespread presence of such activities across 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.

3. 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 – such effects only rarely occur in other city 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 intended 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, including greater extents of natural environmental impacts, are avoided or lessened by growing more efficiently in cities.
4. Discussion under item 3 above is also relevant to the proposal for increased flexibility for presence of residential uses in ground floors of uses in commercial zones. While this could generate some added potential for complaints brought about by proximity of residential and commercial uses, the experience of Seattle’s development patterns in 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, 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 if proximity of a residential use to a noisy restaurant led to complaints, a range of probable enforcement actions could be taken in a manner meant to resolve any violation that might occur.
5. Accommodating more development of detached accessory dwelling units (DADUs) would result in additional structures with a residential presence in areas that are generally low-density and single-family in nature. Allowed densities would not change, as accessory units are already permitted in all single family zones in the primary structure. On the through lots that are the primary subject of these changes, the proposal would allow for construction of DADUs in yards that would be identifiable to most people as back 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 prominent than other DADUs built to date, due to amendment of a 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. The relative potential for visual changes and incremental alteration of local land use character with a denser pattern would represent a probable adverse type of land use impact but this 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 addition of more DADU residences over time. Rather, the likely progression would be a gradual expansion of housing types,

densities and arrangements through new residential development distributed intermittently within various neighborhoods of the city. In this manner, any given low-density neighborhood would evolve toward a slightly different development character that would still remain comparable to and compatible with a typical low-density residential character. This type of change would be expected to continue to be consistent with the City's public policy and planning objectives for such areas.

Proposed measures to avoid or reduce shoreline and use impacts are:

None proposed.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

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. This future development would likely contribute to higher volumes of vehicle traffic in all of these urban centers or station area overlay districts. However, it would also tend to increase average proximity of residents and businesses to locations with frequent transit service, thereby increasing the capability and probability that future residents will use transit service more frequently, on a per capita basis, to move around the city. 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.

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 through encouragement of more efficient clustering of development in areas already served by city utilities and public services. While utility conditions vary widely in different parts of the city, including in and near urban centers and station areas, the long-term development pattern supported by the proposal would likely be more efficient than other possible density patterns that might be more dispersed. This principle also is particularly relevant when compared on a regional basis, where per-capita costs and inefficiencies of utility and public service provision for a comparable amount of residential housing likely would be significantly greater than if growth is more densely accommodated in Seattle's designated growth centers.

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

1. 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 primarily 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. The relative impacts on a given area could vary depending upon the characteristics of the street and a property's relative

location to arterial traffic routes. 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 occur if the characteristics of a given situation suggest a finding of adverse traffic/parking impacts, which would help avoid and mitigate the potential for these impacts.

2. 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 modest 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. 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 onto the closest residential streets would be possible. The proposal also accommodates such activities newly 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 depending upon local street conditions. 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.
3. Similar to discussion under item 2 above, the accommodation of commercial uses into ground floors of buildings in LR2 and LR3 zones would generate additional potential for adverse traffic/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, this would not be a guaranteed outcome in every case. This is not interpreted to represent a significant adverse impact due to a relatively low probability that ground-floor uses would become so attractive of customers as to generate substantial on-street traffic or parking impacts, and due to the proposal accommodating this activity only in urban centers and station areas where more activity and density of use is already expected.
4. The increased accommodation for 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 that would generate less traffic/parking impacts than would a pattern with more commercial uses. This is because many commercial uses would be assumed to generate higher volumes per square foot of floor area than residential uses. In practice, this requirement is likely to only result in added residential presence in some cases and not to a maximal extent possible under the code. This would tend to moderate and limit the potential for adverse traffic/parking impacts.
5. 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 due to new residential units, in a manner similar to traffic generated by other low-density existing residential units.

6. The different height measurement technique for South Lake Union could make a difference in future site-specific development to achieve density that otherwise would not be possible. This would generate an 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 and traffic generation patterns in that area. To the extent that such additional area is developed, it would be subject to voluntary traffic mitigation contributions or other traffic mitigation techniques when reviewed as a development proposal.
7. The continued ability to require transportation impact evaluation and mitigation 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.

Proposed measures to reduce or respond to such demand(s) are:

None proposed.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

It is believed that the proposal would not result in conflicts with local, state or federal laws or requirements for protection of the environment.