



**ANALYSIS AND DECISION OF THE DIRECTOR
OF THE DEPARTMENT OF CONSTRUCTION AND INSPECTIONS**

**SEPA Threshold Determination
for
Permanent Home Occupation Regulations**

Project Proponent: City of Seattle

BACKGROUND AND PROPOSAL

Background Information

Prior to the current proposal, adoption of Ordinance 126293 was a non-project action that updated and amended various provisions of the Land Use Code addressing home occupations, as an interim regulation and response to economic and operational difficulties caused by COVID-19 and related emergency proclamations.

Ordinance 126293 temporarily reduced requirements and conditions in Seattle's Land Use Code on the operation of home occupation businesses. Those interim regulations were subject to a SEPA analysis and Determination of Non-Significance in 2021. The interim regulations expired in November 2022.

Current Proposal

The current proposal originated with a request by Councilmember Strauss to evaluate and propose code amendments to achieve permanent home occupation regulations similar to the interim regulations. The intent is to create flexibility on a permanent basis for Seattle residents to operate businesses, referred to as home occupations in the Code, as an accessory use at their residence. The current proposal retains most of the flexibility enacted in Spring 2021 by Ordinance 126293, intended in part as a response to COVID-19, which expired in November 2022. The current proposal also makes a few other adjustments to the provisions to similarly achieve flexibility. Home occupation provisions are in Section 23.42.050 of the Land Use Code.

The proposal includes:

1. Eliminate the requirement that customer visits are by appointment only;
2. Eliminate restrictions on the visibility of the home occupation from the exterior of a structure and allow interior and exterior alterations of structures that would accommodate home occupations so long as development standards are met;
3. Allow home occupations to be conducted in outdoor areas, while retaining provisions that prohibit spillover impacts such as noise, odor, dust, light and glare;
4. Eliminate a limit of two employees who are not residents;
5. Allow for increases in on-street parking congestion or traffic in the vicinity related to home occupation uses, except for automotive retail sales and services uses;

6. Clarify that a home occupation-related vehicle may park anywhere that parking is permitted on the lot, including required parking spaces;
7. Prohibit a home occupation from being a drive-in business;
8. Increase the limit of home-occupation-related vehicles that operate at the home occupation site from 2 to 6;
9. Clarify that the limit on number of vehicles associated with a home occupation refers to the number of vehicles operating at the home occupation site and not to other vehicles that are not at the site;
10. Eliminate a limit on the number of daily deliveries allowed to a site. The current limit is one per weekday and zero on weekends and holidays;
11. Allow one sign up to 5 square feet (720 square inches) bearing the name of the home occupation, an increase from the prior limit of 64 square inches.

Public Comment

The proposed changes to the Land Use Code required City Council approval. Opportunity for public comment occurred during Council meetings and hearings. The ordinance and this environmental review and SEPA Determination will be available online for public comments.

ANALYSIS – OVERVIEW

Environmental review resulting in a Threshold Determination is required pursuant to the State Environmental Policy Act (SEPA), WAC 197-11, and the Seattle SEPA Ordinance (Seattle Municipal Code (SMC) Chapter 25.05).

The following report describes the analysis conducted to determine that the action is not likely to result in *probable significant adverse environmental impacts*. This threshold determination is based on:

- the language of the proposed amendments and related contents as described above;
- the information contained in the *SEPA checklist* (dated September 19, 2022), including annotations made by SDCI staff;
- review of materials prepared as background information about the code amendments, prepared by City staff; and
- the experience of the SDCI analyst in reviewing similar documents and actions.

ELEMENTS OF THE ENVIRONMENT

Short-Term and Long-Term Impacts

A. Natural Environment

Earth, Water, Water Quality, Plants/Animals/Fisheries/Marine Life

The current non-project proposal is not expected to generate probable significant adverse impacts for these natural environmental elements, either directly or in its potential for indirect or cumulative impacts related to future development influenced by the action.

Seattle is mostly urbanized in its development patterns, but it also has retained greenbelts, hillsides, stream, river, bay, and lake environments with diverse kinds of plant, animal, fish and marine habitats. This includes many shoreline edges hosting birds, fish, and other marine life.

- Wildlife on land largely includes those species habituated to urban areas and fragmented vegetated areas in the city, with common types including squirrels, opossum, coyotes, and a variety of bird species including eagles. Threatened, protected, or endangered species that could be present near future development include heron, and salmon in locations downstream via natural drainages.
- Seattle has numerous soil types, including mineral soils dominated by clay, silt, or sand, as well as organic soils such as peats and mucks. No agricultural soils or prime farmland are located within the Seattle corporate limits. As a densely urbanized area, many of Seattle's native soils have been extensively altered by filling, grading, and other activity.
- The Seattle area is known to be in an active seismic area, as is the entire Puget Sound region.
- Seattle's surface waters include marine areas (Puget Sound), rivers, lakes, and creeks. Rivers and creeks include but are not limited to the Duwamish waterway, Longfellow, Fautleroy, Taylors, Thornton, and Pipers Creek. Freshwater lakes include the Lake Union/Ship Canal, Green, Haller, and Bitter Lakes and numerous ponds and wetlands.

The current non-project proposal would result in no direct adverse significant adverse impacts to earth, water, plants, animals, fish, or marine life environmental elements because it does not propose development of new buildings but rather authorizes home occupation businesses in existing structures or outdoors on existing lots. The order of magnitude of such businesses may run to several hundreds or even more than one thousand in low-density residential zones across the city. However, the nature of the added or revised provisions in this proposal do not suggest a particular physical implication that would substantially affect earth or water resources in a significant adverse manner.

However, in relation to potential cumulative impacts: discontinuing the need for customer appointments, removing employee limits, discontinuing limits on numbers of deliveries, raising the limit on number of occupation-associated vehicles, and limiting the range of uses for which transportation and parking congestion impacts are considered, could conceivably lead to increased volumes of customer visits and more total volumes of vehicle trips. Because automobile trips can lead to added increments of pollutant emissions onto surfaces (rubber, oil deposits onto roads), the proposal could generate adverse impacts upon stormwater runoff into natural systems. Also, accommodating home occupation uses in outdoor locations to a greater degree could increase the potential for depositing of oils or other debris in places where stormwater runoff could wash such pollutants off the site.

Environmentally sensitive resources (such as endangered species habitat, wetlands, floodplains, riparian corridors) are relatively scarce across most of Seattle's urban residential areas; this means there would be limited chances of a home occupation being close enough to such a resource to create meaningful direct adverse impacts on them. Also, the nature of most home occupations, as relatively low-intensity activities mostly occurring within structures, would have a low probability of creating direct or indirect damage upon these sensitive environmental

resources where they are present in Seattle. However, related to the disclosure of potential adverse impacts related to water and air and noise due to elements of the proposal (including the allowance of outdoor home-occupation related activities to a greater degree), future home occupation activities related to this non-project action could conceivably generate these types of impacts, which could contribute to degradation of quality of plant, animal, and fisheries habitats in nearby and downstream areas. The potential for instances of these impacts would be dispersed in many places across the city. Because there is a lack of probable geographic concentration of home occupation uses that might create substantial amounts of outdoor debris and pollutant deposition, and a probable low intensity of use in any given location, and a probable majority of home occupation uses occurring within structures, the probable magnitude of adverse impacts of these kinds on these habitat types would be minor.

Also, for environmentally critical areas such as steep slope and landslide hazards, the proposal would not eliminate existing City regulatory protections that prevent or minimize the potential for significant alteration of these areas, which would help avoid impacts of on-site activities to those resources.

Air Quality, Noise, Energy, Natural Resources Depletion, Environmental Health

This non-project action would result in no direct significant adverse impacts to these environmental elements because it does not directly propose development. Similarly, this analysis identifies no probable significant adverse indirect or cumulative environmental impacts of these kinds, even though the proposal would make it easier to open or operate a home occupation business.

Air Quality, Toxic/Hazardous Substances, Noise

The current proposal would not directly, indirectly, or cumulatively be likely to generate significant increases in discharges or emissions of toxic or hazardous substances, to the air, or significantly increase the production of noise. Rather, it provides more flexibility in code requirements to accommodate a broader range of business activity in home occupations that are accessory to residential uses, throughout the city. Existing home occupation businesses widely vary but the most common types are self-employed professional or administrative services, many varieties of personal services, trades services (like plumbers and electricians), goods production or sales, and child care. These existing uses include a relatively small increment that already generate noise and/or use of toxic substances, and air emissions in the worst case. Under existing regulations, these kinds of spillover impacts onto neighboring properties are prohibited and are subject to enforcement. No amendments are proposed for these spillover-protective provisions.

Air Quality, Toxic/Hazardous Substances

Comparing the proposal to the home occupation provisions that preceded the interim provisions, discontinuing the need for customer appointments, deleting employee limits, and limiting the range of uses for which transportation and parking congestion impacts are considered, could conceivably lead to increased volumes of customer visits and accommodate more total volumes of vehicle trips. Also, accommodating home occupation uses in outdoor locations to a greater degree could increase the potential for depositing of oils, equipment exhaust, dust, or other debris in places where stormwater runoff could wash it off the site. Because automobile trips can lead to added increments of pollutant emissions such as rubber, oil, and dust onto surfaces and into the air (vehicle exhaust, dust), the proposal could generate adverse impacts of minor degradations to

localized air quality. These would represent a potential adverse impact but not a probable significant adverse impact, due to the dispersed nature and small number of likely air-polluting activities from home occupations, and the reasonable probability that there would be no differences (or the differences would be negligible) when comparing air quality conditions with and without the current proposal.

Regarding potential for added toxic/hazardous substance use, given the nature of the proposal's amendments of provisions, which do not relate to enabling greater use of such substances, there is not a probability of significant adverse impacts caused by this proposal. However, the presence of more home occupation uses over time could include additional uses for which toxic/hazardous substances are a part of a business process, and thus an increased potential for adverse toxic/hazardous material-related spillage impacts could occur.

Noise

The interim home occupation provisions accommodated more business-related activity, more employee-related activities on a property and comings and goings of customers, and accommodated more parking on local streets by employees or customers. The current proposal would allow for a continued degree of flexibility for these kinds of activities. Specific aspects of the proposal would accommodate more customer visits, more employees at a home occupation, more deliveries, operation of more on-site vehicles, more home occupation-related activities in outdoor locations, and probable additional traffic volumes and use of parking on local streets. These future kinds of activities could create additional noise, which could result in additional instances of annoyances and complaints by nearby parties. Types of noise, times of day, and magnitudes of noise levels generated by a home occupation could vary widely depending on the nature of the home occupation, as well as the context of the property (for example, within a residential neighborhood or a mixed use or commercial use district).

However, the existing code's regulations against spillover impacts would remain in place, against noise, odor, light, glare, dust, and other similar impacts. This is also true for City noise limits in Chapter 25.08. Complaints on home occupations could still occur and violations would be enforced through compliance with Chapter 25.08. These might include actions like ceasing or modifying outdoor activities, or limiting hours of noisy or impacting operations. Given the comparability between the existing condition and future condition regarding regulatory controls, there is not a substantial potential for significantly higher noise levels to occur on a sustained long-term basis related to the proposal, on a project-by-project or cumulative basis.

Energy and Natural Resource Depletion

The current proposal would not directly, indirectly, or cumulatively generate significant adverse impacts on energy or natural resource depletion. See the Utilities analysis in this threshold determination for further discussion.

B. Built Environment

Land and Shoreline Use, Height/Bulk/Scale, Housing, Relationship to Plans and Policies

The contents of the current proposal are not likely to generate significant adverse impacts on land use and shoreline use patterns or result in probable significant land use incompatibilities, directly, indirectly, or cumulatively.

Flexibility was accommodated in the interim home occupation provisions

The interim home occupation provisions had defined a higher degree of flexibility than prior provisions to conduct home occupation businesses that are accessory to residential uses throughout the city. Existing home occupation businesses widely vary but the most common types are self-employed professional or administrative services, many varieties of personal services, trades services (like plumbers and electricians), goods production or sales, and child care. The flexibility already granted through the interim regulations has allowed for differences in activities and structural improvements such as using existing residential parking spaces for home occupation activities, and making interior or exterior building alterations that may be in publicly-visible places. This conceptually can include adding equipment in principal or accessory buildings and using it for a home occupation. It has also allowed for more home occupation related activity of a physical nature, such as more employee-related activities on a property, and comings and goings of customers, including more potential parking and traffic congestion on local streets by employees or customers (except for automobile sales and service uses). The range of permissible activities conducted for a home occupation might create differences in noise levels, for which complaints potentially could be made by persons nearby.

Impact analysis

Compared to the home occupation provisions *preceding* the interim provisions, a few differences could lead to incrementally different activity levels under the proposal: 1) allowing customer visits without appointments; 2) allowing more than two employees on a home occupation site (except child care uses that already can have more); 3) allowing more deliveries to a home occupation; 4) raising limits on number of vehicles that can be used on the site; 5) allowing home occupation activities in outdoor locations to a greater degree; and 6) a narrowing of parking and traffic impact generation interests to only automobile sales and service home occupation uses. For non-automobile-sales-and-service-related home occupations that attract regular customer activity, these provisions could lead to higher activity levels on and near properties with home occupations. Occupations (other than child care uses that are already allowed to have bigger operations) could have more employees, and attract more activity on adjacent streets and on property frontages through more customer visits and more deliveries. Potentially adverse differences in availability of parking and generation of localized traffic congestion could occur. Allowing home occupation uses to occur outdoors to a greater degree could mean that certain activities in some cases would be more visible to neighboring properties, and with an associated potential for increased exposure of neighboring properties to noise levels or odors that might lead to complaints about spillover impacts. However, disturbances related to factors like noise and odor impacts would continue to be restricted by existing code provisions that would be continued in the current proposal. These provisions would continue to apply to activities occurring such as customer visits, and disturbances of this kind would be subject to enforcement.

Land Use Code development standards applicable to future home occupation uses would continue to apply going forward. Thus, the proposal is not likely to create new non-conformities related to the arrangement of home occupation uses on a given property. This would help avoid future potential for incompatibilities that might be generated by non-code-compliant juxtapositions of uses, activities, and site improvements. This includes potential height, bulk, or scale differences of future improvements relevant to home occupation uses.

Other amendments in the proposal are relatively limited in their extent and substance, including rearranging provisions' phrasing without changing their meaning, clarifying language, and increasing a permissible home occupation sign size from approximately 0.5 square feet to 5 square feet in size (the same size that was accommodated in the interim provisions). These proposed amendments have either no potential for new adverse land use environmental impacts, or, regarding sign size, represent a relatively minor change in the visual environment that allows for adequate identification of a home occupation business to a potential business visitor. This analysis concludes that compared to existing sign regulations that limit the presence of on-site signage identifying home occupation uses and activities in primarily residential-zoned properties, the increased size and probable cumulative proliferation of such signs under the proposal in predominantly residential zoned areas would generate an adverse land-use-related impact due to the potential amount of cumulative changes in the appearance of the built environment. However, these sign changes would avoid generating significant adverse impacts due to the still relatively restricted sign size limit and a probable broadly scattered pattern of their presence.

Existing protections against spillover impacts would remain in the proposed provisions

Site improvements and activities associated with home occupations would continue to be held to development standards, and nuisance control code provisions prohibiting spillover impacts such as light, glare, noise, odor, dust, and similar impacts also will continue to be in place. Continued enforcement of complaints per codes, with or without implementation of the proposal, will help avoid, reduce, or resolve future nuisance situations that might occur. Given this, most potential worst-case adverse land use-related compatibility or spillover impacts of home occupations in the future would continue to be avoided or minimized.

Impact analysis conclusions

Given all of the factors described above, the worst-case potential for land use compatibility impacts of the proposal are interpreted to be adverse but not significant adverse in magnitude. A wide variety of home occupation uses would be possible, and for some that could experience a high level of popularity, a high level of visitation could conceivably occur either temporarily or over sustained periods of time. These could lead to intermittent generation of effects such as excessive noise and related complaints made by nearby residents, which could generate a need for warnings or other enforcement actions to address or cease the impact-generating activities and discourage future impacting events. Factors that suggest the cumulative future impacts of the current proposal would not generate significant adverse impacts include:

- A large majority of home occupation uses (involving administrative, design, and consultative activities, for example) are not likely to generate excessive customer visits on a daily basis or spillover effects in streets or onto nearby properties;
- Retention of the current provisions that prohibit spillover effects of home occupations from occurring at property lines;
- The ability to continue to enforce street control rules that would prevent unlawful actions like blocking public streets with parked vehicles; and
- The responsibility for City staff to enforce the home occupation provisions on a case-by-case basis according to the particular facts in a given situation.

Housing

The current proposal has only a limited potential to indirectly impact the presence of existing housing, because operation or expansion of home occupation uses conceivably could lead to conversion of living spaces that might include accessory dwelling units. However, such conversion of accessory dwelling spaces away from residential uses would likely be a rare occurrence. Also, the premise of a home occupation assumes that the person conducting the home occupation continues to live at the site. This suggests that the action will not likely induce permanent displacement of housing units or demolition of buildings containing housing. And, the proposal makes no change to the provision that home occupation responsible parties live on the site. This determination therefore identifies no probable significant adverse housing impacts.

Relationship to Plans and Policies

The non-project action supports flexibility in land use provisions to support home-based business and employment, to maintain or restore economic opportunity, vibrancy, and related social benefits. These are objectives aligning with Comprehensive Plan goals and principles relevant to the city, such as:

***Goal GS G1** Keep Seattle as a city of unique, vibrant, and livable urban neighborhoods, with concentrations of development where all residents can have access to employment, transit, and retail services that can meet their daily needs.*

***Goal LU G9** Create and maintain successful commercial/mixed-use areas that provide focus for the surrounding neighborhood and that encourage new businesses, provide stability and expansion opportunities for existing businesses, and promote neighborhood vitality, while also accommodating residential development in livable environments.*

Historic Preservation and Cultural Preservation

Seattle contains numerous landmarks, properties, and districts that are listed on, or proposed for, national, state, and local preservation registers. In addition, while Seattle today comprises a highly urbanized and developed area, it is also an area with potential for the presence of cultural artifacts from indigenous peoples.

The current proposal is not likely to affect whether historic sites or structures might be redeveloped. Existing historic sites or structures are effectively protected by current regulations and so they may only be demolished in rare circumstances that occur with consent of the City. The proposal analyzed in this environmental checklist does not contain provisions addressing home occupations in historic sites or structures, and makes no changes that would increase the probability of future development of new buildings, but rather accommodates the continuing possibility of an increased pursuit of home occupation activities. This kind of activity encouraged by the proposal would lead to a minimal potential for adverse historic site or cultural resource impacts. Further, any structure already landmarked would be required to obtain a certificate of approval from the Department of Neighborhoods/Landmark Board.

Most cultural sites and resources at risk from future development in Seattle are in unknown locations due to their being buried under soils, although certain vicinities such as near-shore areas are known to have greater potential for presence of such resources given past activities of indigenous peoples. The current proposal does not include provisions that would specifically alter the likelihood of future development occurring in any given location or type of vicinity such as

near-shore areas. And the action does not include provisions that are likely to increase total site clearing and grading of future permanent development.

Also, implementation of the current proposal would not affect the strength of the City's regulatory protection of cultural sites or resources if they are discovered during future development, which is addressed by other State and local regulations, policies, and practices. With or without the current proposal, such processes are mandated to stop construction, assess the resources, and take appropriate next steps for the cultural resources' protection or preservation.

Transportation, Parking, Public Services and Utilities

The current proposal is not likely to generate significant direct, indirect, or cumulative adverse impacts on transportation, parking, public services, or utilities.

Transportation and Parking

The current proposal would make permanent a number of home occupation provisions that were interim standards. Doing this would continue an approach that has fewer limitations on how home occupations may be conducted on a site. This includes factors such as allowing a greater number of employees to be present at the site, allowing customer visits without appointments, and accommodating additive levels of home-occupation-related parking and traffic congestion on nearby streets except for those generated by automobile sales and service uses. Compared to likely outcomes under the interim regulations, because these capabilities would be the same, no new levels of potential significant adverse transportation-, parking-, public services-, or utilities-related impacts are identified.

However, compared to the home occupation provisions that existed prior to the interim ordinance, the proposal would result in a probable net difference in generation of adverse transportation and parking impacts.

The non-project proposal includes amendments that would accommodate more employee vehicle trips, more delivery trips, more occupation-related-vehicle trips, and more customer vehicle trips. It would also narrow project-related parking and traffic impact interests to only those generated by automobile sales and service home occupation uses. For non-automobile-sales-and-service-related home occupations that could attract regular customer activity, these provisions could lead to higher activity levels. Occupations (other than child care uses that are already allowed to have bigger operations) could have more employees, and attract more activity on adjacent streets and on property frontages through more customer visits. Potentially adverse differences in availability of parking and generation of localized traffic congestion could occur.

These could lead to an additional increment of street traffic, on-street parking volumes, and increased congestion across a wide variety of local and arterial streets. It is not possible to narrowly identify which specific parts of the transportation network might be tangibly impacted by this non-project proposal applicable throughout the city. Home occupations would likely continue to occur in a dispersed geographical pattern, with great variety in how many transportation trips any given home occupation might generate. It is likely that a great majority of home occupations would generate relatively low numbers of trips ranging from perhaps 2 to 20 vehicle trips per day; and could include home occupations generating a regular flow of greater than 20 customer vehicle trips over the course of a day; and could include occasional instances of

popular home occupations that could generate higher levels of visitation either temporarily or over sustained periods of time. Although these varying levels of additional home occupation related trips could generate adverse congestion on local streets, it is unlikely that any particular street improvement needs would occur as a direct result. This relates to a probable temporary and highly variable demand generation for any given home occupation use over the long-term. Street improvement projects tend to be diagnosed, planned, and funded on the basis of long-term needs and demonstrable patterns of traffic volumes and circulation. It is unlikely that the effects of any given home occupation use or combination of nearby home occupation uses would necessitate lane expansion or turning lane or signalization improvement needs. This is interpreted based on the responsible official's knowledge of traffic impact analysis and City transportation planning practices.

Parking utilization in the wide variety of streets potentially affected by home occupation uses varies widely, ranging from local streets with low-to-moderate rates of available on-street parking use on a daily basis to other local or arterial streets where most on-street parking may be used a majority of the time. Existing residential uses contribute to a large increment of the existing on-street parking demand in any given area, particularly when residential households own and use multiple vehicles. Impacts on parking availability from any given future home occupation use could vary from occasional short-term use by customers of easily available spaces, to increasing competition among motorists for parking on streets where most parking spaces are used. In the worst-case, home occupation uses that generate high volumes of daily customers for a sustained period of time would contribute incrementally to adverse increases in competition for on-street parking. Similarly, customer-related vehicle traffic or other vehicle trips related to home occupation uses could contribute to denser traffic flows and thus more congestion on streets, including non-arterial streets, which could lead to more frequent occasions of on-street traffic congestion and, in the worst-case, inappropriate actions such as double-parking or similar disruption of normal street traffic flows.

Public Services

With additional activity levels possible at certain home occupations due to customer visits, outdoor activities, and numbers of employees, there is a chance that public disturbance and nuisance-related situations could arise at properties with home occupations, and/or due to traffic or parking congestion situations if they would disrupt local street use and accessibility (Sano, Seattle Police Department, 2022). If this occurs, it could result in an additional increment of demand for police and fire/emergency services and a greater number of service calls would occur. While this could generate adverse impacts upon these service providers, due to a relatively low probability of sustained activity over time, these incidental possible increases in service demand would not likely generate significant adverse impacts upon police and fire/emergency service providers in terms of staffing or equipment needs or related costs.

Utilities

Proposed provisions relating to larger signs, customer visits without appointments, outdoor activities and deliveries, and deleting a limit on employee count would not result in probable adverse impact differences in relation to energy consumption. While additional employees at a home occupation site could cause increases in total energy consumption, it is unlikely that the increases in energy use would be large in magnitude of change or would exceed a local energy infrastructure system's ability to provide such energy to the home occupation site. Also,

simply adding employees to a home occupation would not necessarily increase energy consumption if, for example, the use's work activity is a low-intensity activity such as using computers occurring in the same space that a smaller number of employees would use. This outlook would also apply to other typical utilities – water, sewer – provided at sites that might be engaged in home occupations.

DECISION – SEPA

This decision was made after review by the responsible official on behalf of the lead agency of a completed environmental checklist and other information on file with the responsible department. This constitutes the Threshold Determination and form. The intent of this declaration is to satisfy the requirement of the State Environmental Policy Act (RCW 43.21C), including the requirement to inform the public of agency decisions pursuant to SEPA.

[X] Determination of Non-Significance. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030(2)(c).

[] Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030(2)(c).

Signature: _____/s/_____ Date: _____ November 28, 2022
Gordon Clowers, Sr. Planner
Seattle Department of Construction and Inspections