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Seattle 2035 Comprehensive Plan Update  
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## **URGENT NEED TO REBALANCE THE DRAFT COMPREHENSIVE PLAN UPDATE**

To the Mayor, City Council, DPD, and Planning Commission:

The current draft “update” of Seattle’s Comprehensive Plan is in effect a new plan that would unleash unprecedented and unbalanced growth pressures upon those neighborhoods that the Comprehensive Plan since 1994 has designated as urban centers, hub urban villages, or (like Eastlake) residential urban villages. The current draft would impose on these urban centers and villages major new growth expectations while removing hundreds of protections in the current Comprehensive Plan that now ensure them some semblance of village-like livability.

The information that the City has so far given out at public events and on its web site discloses few of the hundreds of provisions of the current Comprehensive Plan that would be deleted or weakened. The City must revise this draft to make it more balanced; and it must tell the public about the actual changes from the current Comprehensive Plan that the proposed “update” would actually make.

**This “update” would repeal current protections for livability and public involvement.** Officially terming these neighborhoods as “urban villages,” as the Comprehensive Plan has done since 1994, was a promise that while growth would come, it would be no more than is consistent with the intimacy and charm of a village. The commitment was that urban problems like crime, noise, traffic danger, etc. would not be worsened by growth; that public investments would bring amenities like parks, sidewalks, etc.; that the growth expectations for urban villages would be scaled back if livability would otherwise be sacrificed by growth; and that the residents, businesses, and community organizations in each village would (especially through neighborhood planning) play a central role in decisions about how much it should grow and in what ways.

Contrary to those commitments, the current “update” would transform the Comprehensive Plan into an engine of growth at any cost. Goals and policies that currently protect sustainability, livability, and public participation would be either weakened or entirely deleted. The “urban village strategy” would be redefined to deny the urban centers and urban villages the balancing protections that they now enjoy in the current Comp Plan.

**Policies and goals in the Comp Plan have protections in state law; removing them would eliminate that protection.** Washington state law (the Growth Management Act) requires cities and counties each to have a Comprehensive Plan, to obey it, to amend it only once a year, and to do so in accordance with City laws and resolutions. Enforcement action can be imposed by the Washington state Growth Management Hearings Board and the state courts. Because so many policies and goals in the current Comprehensive Plan would be either deleted or moved to a plan other than the Comprehensive Plan, the public would lose major protections under state law; this must not be allowed to happen.

**Following are specific responses and comments on different parts of the proposed Comprehensive Plan update.** Most of the comments are about parts of the current Comprehensive Plan that are slated for elimination but should be kept. Some comments are about additions that should not be made. And a smaller number of comments are about City proposals that should be accepted, or proposals that we hope that the City will consider. Goals are those with a G and policies are those without a G. In most cases a proposed deletion is complete; but here a policy or goal is also deemed deleted if whatever language proposed in its place is not a meaningful replacement.

## **BALANCE GROWTH WITH LIVABILITY AND SUSTAINABILITY**

**1. Do not delete *Toward a Sustainable Seattle* from the Comp Plan’s title.** The proposed update would eliminate these words from the Comprehensive Plan’s title; since the Plan was first adopted in 1994, its title has been *Seattle’s Comprehensive Plan: Toward a Sustainable Seattle*. (The proposed new title is *A Comprehensive Plan for Managing Growth*.) *Effect of the proposed change: The Comp Plan’s title would all too accurately reflect what this proposed update seems intended to make it--a growth machine, no longer a means to ensure that growth is balanced with sustainability and livability*

**2. Do not delete the current priority for sustainability from the Comp Plan’s text.** Throughout, the current Comp Plan’s references to sustainability would be deleted. For example, the proposed update would eliminate the following from page vii of the current introductory Vision section: “Sustainability is the common-sense notion that the health of our environment, our economy, our bodies, and our community as a whole, are not only closely linked, but dependent on one another. The four core values described above -- economic opportunity and security, environmental stewardship, social equity and community -- are the pillars of sustainability. The overarching goal of this Comprehensive Plan is to promote sustainable development -- that is, development that reflects, protects, and advances these core values, through a smart and well-integrated approach to where and how we grow.” *Effect of the proposed deletion: the Comprehensive Plan would favor growth at any cost rather than seek a balance with sustainability and livability.*

**3. Do not delete goal UVG35, “Achieve development within urban villages at a pace appropriate to current conditions in the area.”** Growth is not sustainable if it is pressed at a pace faster than is physically or socially bearable. *Effect of the proposed deletion: would break a promise to urban villages that has been in the Comprehensive Plan since its adoption in 1994: Growth must be kept to a pace that does not damage or disadvantage the community.*

**4. Do not delete policy UV30, for balanced growth.** The proposed update would delete UV30, “Balance objectives for accommodating growth, supporting transit use and walking, maintaining compatibility with existing development conditions, maintaining affordable housing, and responding to market preferences for certain types of housing, through the density and scale of development permitted.” *Effect of the proposed deletion: would break a promise to urban villages that has been in the Comprehensive Plan since its adoption in 1994, namely that growth will be of a magnitude and kind that is compatible with local conditions and with affordability.*

**5. Do not delete policy UV69 for coordinating investment and growth.** The proposed update would delete UV69: “Maximize the benefit of public investment in infrastructure and services, and deliver those services more equitably by focusing new infrastructure and services, as well as maintenance and improvements to existing infrastructure and services, in areas expecting to see additional growth, and by focusing growth in areas with sufficient infrastructure and services to support that growth. *Effect of the proposed deletion: would eliminate guidance and incentives for equity in sharing the impacts of growth and of investment in and maintenance of infrastructure and the private investment that follows it.*

## **NEIGHBORHOOD CHARACTER AND AFFORDABILITY**

**6. Do not delete policy LU11:** “In order to maintain the character of Seattle’s neighborhoods and retain existing affordable housing, discourage the demolition of residences and displacement of residents, while supporting redevelopment that enhances its community and furthers the goals of the Plan.” *Effect of the proposed deletion: would reduce current protections for affordable housing and neighborhood character.*

**7. Do not delete goal LUG2:** “Foster neighborhoods in which current and future residents and business owners will want to live, shop, work, and locate their businesses. Provide for a range of housing types and commercial and industrial spaces in order to accommodate a broad range of families and individuals, income groups, and businesses.” *Effect of the proposed deletion: would reduce the Comp Plan’s neighborhood focus.*

**8. Affordability criteria must moderate efforts to promote density.** Much in the proposed update favors increased density, with the apparent assumption that affordability will benefit when it may not and in fact may suffer from related displacement. The environmental impact statement done as a part of the proposed update [section 3.6.3 Mitigation Strategies (for Housing)] stated:

Under all alternatives, including the No Action Alternative, housing affordability and risk of displacement will continue to be a significant concern. As described previously, housing affordability and displacement are driven by demand generated as a result of Seattle’s strong job market, land value, construction costs and other factors outside of the proposal and alternatives.

Nevertheless, the City recognizes the critical importance of these issues and recommends consideration of the following mitigation strategies. Housing affordability strategies should be tailored to meet specific objectives, for example: Creating an environment where the community retains the conditions that afford it good opportunities while providing for stability and economic mobility for people vulnerable to displacement; expanding choices in areas that are currently unaffordable for lower income people who may want to live or operate a business there; and stabilizing areas that are transitioning to higher levels of desirability due to amenities such as light rail service.

**9. Retain the current policy LU102 and reject the proposed LUG7 so that density will not be prioritized over affordability.** LU102 offers zoning incentives and other tools to provide for or preserve public benefits including “housing affordable to low- and moderate-income households. The proposed new LUG7 would use those same tools to push density without any reference to affordability.

**10. The proposed housing element contains some good provisions for neighborhoods.** H3.5 says to “Consider allowing additional housing types that respect existing neighborhood character in single-family areas, particularly within or near urban centers and urban villages” H4.7 says to adopt development standards and design guidelines that help achieve a variety of quality housing types and respond flexibly to unique neighborhood contexts.

**11. The proposed housing element seems be concerned mainly about the low end of displacement.** Its proposed policy H5.9 recommends addressing “the needs of communities most vulnerable to displacement due to redevelopment pressure through policies and funding decisions related to extremely low-, very low-, and low-income housing.” This seems too narrow a view. People who are above the low-income level may significantly at risk for displacement, and with few options.

**12. Do not add policy LU9.11 on midrise zones:** “Use midrise multifamily zones to provide additional housing opportunities in urban villages and centers.” *Effect of the proposed addition: Encourages midrise zoning with its taller buildings in parts of urban villages and centers whose neighborhood plan does not call for it. Disempowers neighborhood planning.*

**13. The proposed new goal LUG2 on zoning fails to give priority to neighborhood impacts or even mention them.** As proposed, LUG2 states that zoning will “Allow for a variety of housing types to accommodate housing choices for households of all types and income levels; support a wide diversity of employment-generating activities providing jobs for a diverse residential population, as well as a variety of services for residents and businesses; and accommodate the full range of public services, institutions, and amenities needed to support a fully developed, diverse, and economically sustainable urban community.” The goal needs to be revised to give priority to the local conditions that make for a successful neighborhood. *Effect of the proposed revision: zoning would increasingly be based on citywide priorities rather than on neighborhood conditions and needs.*

**14. Do not delete policy LU3 on rezones:** “Establish rezone criteria and procedures to guide decisions about which zone will provide the best match for the characteristics of an area and will most clearly further City goals.” This proposed deletion is one of many in which the proposed update would throw out policies in the current Comprehensive Plan which direct that land use decisions be respectful

of the local context. We are concerned that relying mainly on the Future Land Use Map could encourage a cascade of rezones that would ignore local conditions and neighborhood plans. It would be better to adopt a policy requiring that all rezones be consistent with neighborhood plans. *Effect of the proposed deletion: Encourages wholesale upzones without regard for local condition, plans, or preferences.*

**15. In new policy LU5.16 on view protection, the proposal should allow private view impacts to be considered when permitting or denying a conditional use, rezone, or other departure from the land use regulations.** As the proposed update encourages rezones, conditional uses, and other departures, it is important for potential view blockage by a new project to be a valid objection.

**16. Do not delete policy LU81 limiting building heights:** “Limit building heights to establish maximum heights, maintain scale relationships with adjacent buildings, and limit view blockage.” *Effect of the proposed deletion: lowers current obstacles to unlimited increases in building heights.*

**17. Do not adopt proposed policy GS4.20, “Consider taller building heights in key locations to provide visual focus and define activity centers.”** *Effect of the proposed addition: unusually tall buildings are more likely to shadow activity centers and to block views rather than provide visual focus.*

**18. Do not adopt proposed policy GS4.23, “Encourage street widths and building heights that are in proportion with each other by reducing setbacks from the street and keeping reasonable sidewalk widths for lower buildings.”** *Effect of the proposed addition: reduced setbacks aren’t a good thing in an urban village where yards and especially trees are lacking and much needed to green up the area. Plus: the proposal doesn’t make sense.*

**19. Do not delete policies LU1, LU5, LU76, LU164** that currently direct that zoning, rezoning, and conditional use changes reflect community preferences, and be consistent with neighborhood plans. *Effect of the proposed deletion: ignores community preferences and marginalizes the neighborhood planning process.*

**20. Do not delete policies LU59 and LU60,** which define and protect single family zoning. *Effect of the proposed deletion: lowers the Comp Plan's barriers to eliminating single family zoning.*

**21. Do not replace policy LU67 with policy LU8.9.** *Effect of the proposed replacement: could bring back the previously prohibited ultra small lot development in single family and multifamily zones.*

## **PUBLIC AND NEIGHBORHOOD INVOLVEMENT**

**22. Do not eliminate the commitment to public involvement in the current Comp Plan’s Vision section.** That section (proposed to be entirely deleted in the update) now reads (p. ix) as follows: “Citizen participation in City processes will build upon the dialogue between government and citizens that began with the development and adoption of the Plan. The City will strive to find improved means to communicate with and involve citizens in planning and decision-making. The City will strive to provide information that can be easily understood and to provide access for public involvement. This will include processes for amending and implementing the Plan.” *Effect of the proposed deletion:*

would undermine City efforts to reach out truthfully to the public and involve it meaningfully—a new neglect already reflected in how the current update process is failing to inform and involve the public.

**23. Do not remove the commitment to widespread public involvement in the current Comp Plan’s Urban Village element (proposed to be renamed and refashioned as the Planning for Growth element). But do add (and practice) transparency.** Both of the following provisions would be eliminated in the proposed update: UVG10, “Collaborate with the community in planning for the future.”; and UV8, “Involve the public in identifying needs for planning, and designing public facilities, programs, and services. Encourage and provide opportunities for extensive public involvement in City decisions, and encourage other agencies to provide similar opportunities.”

**24. The proposed Comp Plan update should not delete UVG10 and UV8 or replace them with a rather weak goal and policy.** The new goal would be GSG1, “Have strategies that prepare the City for the challenges and opportunities of growth and that represent the needs and desires of a broad cross-section of city residents and business owners.” ; and the new policy would be GS1.2, “Engage Seattle residents and businesses in discussions leading to the adoption of plans that guide growth, City government activities, and City services so that the outcomes reflect the public’s values and concerns.” These proposals are not worthy of replacing UVG10 and UV8, which should be kept. *Effect of the proposed change: The proposed new GSG1 and G1.2 fail to give any priority to widespread public involvement. The original language from UVG10 and UV8 (quoted above) should be retained.*

**25. The proposed new GS1.2 is good and should be added: “Maintain an updating process for this Plan that is predictable and transparent to the public.”** Unfortunately, this standard of transparency is not being met in the current update process.

**26. The proposed update would unjustifiably remove from most of the Comp Plan’s sections the policies and goals for community involvement.** The update would systematically remove all of the references to community involvement throughout the Comprehensive Plan. *Effect of the proposed deletion: eliminates the Comp Plan’s current openness and encouragement for public involvement.*

**27. Do not adopt the huge number of deletions in the element on neighborhood planning, and do not remove from most Comp Plan elements most other references to neighborhood plans and neighborhood planning.** The proposed Comp Plan update would virtually eliminate any recognition or priority for neighborhood planning. Among the policies proposed for elimination are those numbered N10 to N19 regarding its implementation:

N10: Establish a firm and clear relationship between the City’s budgeting processes and adopted neighborhood plans and, using the biennial budget, demonstrate how the urban village strategy is being carried out.

N11: Assess as part of the City’s budget process, neighborhood plan implementation needs and resources, taking into consideration the results of implementation activities for each area and public input into the budget process.

N12: Use adopted neighborhood plan goals and policies and the City’s neighborhood plan work plan matrices to help balance between competing goals in City decision making and the allocation of budget resources.

N13: Consider recommendations from neighborhood plans in the context of Seattle as a whole. Incorporate such requests into City prioritization processes, as appropriate, for capital expenditures and other decision making recognizing the City's legal, administrative and fiscal constraints.

N14: When allocating resources to implement neighborhood plans, at a minimum consider the following factors: Where the greatest degree of change is occurring; Where growth has exceeded current infrastructure capacities; Where there is a deficit in meeting service levels called for by the Comprehensive Plan or the expectation of other City policies or agency plans; Where there is an urban center or urban village designation; Where the neighborhood plan goals and policies or work plan matrix have specific prioritized plan recommendations endorsed by the City; Where resources would help spur growth in urban centers or urban villages; Where there are opportunities to leverage other resources, or partnerships; Where the resource would address priorities of more than one neighborhood; and Where the impact of a single, large activity generator will have detrimental effects on the infrastructure capacities of the neighborhood.

N15: In implementing neighborhood plans, work with neighborhood groups to refine and prioritize recommendations in light of changing circumstances and consistent with the adopted goals and policies of each neighborhood plan.

N16: Permit the addition of new strategies, including regulatory changes, through the neighborhood plan implementation process when existing tools are inadequate to meet implementation needs.

N17: Support and encourage the incorporation of cultural elements, such as public art and historic resources, in the implementation of neighborhood plans. In future planning efforts, include a broad range of creative skills to improve the value of the neighborhood projects.

N18: Monitor progress toward implementing Council adopted neighborhood plans and communicate results to City officials, neighborhood planning participants and interested citizens.

N19: Support neighborhood plan stewardship with the goal of promoting continued cooperation between the City and local neighborhoods in implementing adopted neighborhood plan goals and policies, carrying out neighborhood plan work plan activities and implementing this Comprehensive Plan. These efforts should be directed toward not only accomplishing specific projects, but also toward fostering the ability of neighborhoods to inspire people with the energy, interest and ability to work collaboratively with the City in implementing neighborhood plans.

The Neighborhood Planning element should NOT suffer deletion of the above ten policies numbered N10 to N19 that are in the current version. *Effect of the proposed deletion: eliminates the centrality of neighborhood plans and neighborhood planning to the current Comp Plan. In fact, it consigns neighborhood plans and planning to a negligible role.*

**28. As one example among many, the addition of policy LU9.1 (discussed in the above section on neighborhood character and affordability) would undermine neighborhood plans by promoting midrise zoning whether or not called for by the neighborhood plan.** The proposed new policy LU9.1 should NOT be adopted.

**29. Do not weaken goal GSG1 by stating that in amending the Comprehensive Plan, only a "broad cross-section of city residents and business owners" will be consulted.** *Keep the original language that makes clear that the Comprehensive Plan is not a top-down or centralized process, but a process of dialogue between the government and its publics.*

## OPEN SPACE, TREES, SHORELINES, AND COMMUNITY CENTERS

**30. Public land (including submerged parcels) that is surplus to its original agency should be kept in public ownership as open space, and sold for possible benefit to housing only if there is no open space use needed.**

**31. Do not delete policy LU34 which encourages yards:** “Limit the maximum amount of lot area covered by a structure to maintain compatibility with the scale and character of an area, to provide an adequate proportion of open area on a site relative to the area occupied by structures, and to provide occupants with sufficient access to light and air, as appropriate to the intended character and use of an area.” *Effect of the proposed deletion: Removes current expectations for yards, landscaping, and trees.*

**32. Do not delete policy LU39:** to “preserve and enhance the City’s physical and aesthetic character and environment by preventing untimely and indiscriminate removal or destruction of trees” and to provide incentives to property owners for tree retention.

**33. Do not delete policy LU41** for street trees.

**34. Do not delete policy UV39** to enhance the tree canopy and understory in urban villages. *Effect of the proposed deletions: Trees would no longer specifically be identified as important.*

**35. Do not weaken policy E10 favoring vegetative cover.** E10 in the current Comprehensive Plan is as follows: “Strive to increase the amount of permeable surface and vegetative cover in the city in order to mitigate the heat island effect of developed areas, control storm water flows and reduce pollution.” The proposed update is not preferable, as it would eliminate the reference to vegetative cover. New E1.4 would read: “Increase the amount of permeable surface by reducing hardscape surfaces where possible and maximizing the use of permeable paving elsewhere.”

**36. Do not delete policy E11 on aquatic areas.** The proposed update would eliminate E11: “Identify long-term goals and develop plan or strategies for improving the environmental quality of each of the city’s aquatic areas, including a long-term plan to restore and sustain Seattle’s creeks. Consider in these plans or strategies the use of incentives, regulations and other opportunities for action to restore and sustain the long term health of Seattle’s creeks and shorelines.”

**37. Proposed policy LU4.8 on minor communication utilities should be amended to not allow them in shoreline areas.**

**38. Do not delete policy CF9, which gives urban centers and villages a priority for public facilities.** The proposed update would delete CF9: “Encourage the location of new community based capital facilities, such as schools, libraries, neighborhood service centers, parks and playgrounds, community centers, clinics and human services facilities, in urban village areas. The City will consider providing capital facilities or amenities in urban villages as an incentive to attract both public and private investments to an area.” Eastlake is probably the only urban village that lacks either a public library, a community center, or a neighborhood service center. The only public meeting space is in the



local school, which is closed all summer. *Effect of the proposed deletion: The current priority for public facilities granted to urban centers and villages would be eliminated, just at the time they are being asked to take on still more growth.*

**39. Do not delete the current policy CF7 (proposed for elimination in the update):** “The City will consider capital improvements identified in neighborhood plans, in light of other facility commitments and the availability of funding and will consider voter approved funding sources.”

**40. Do not delete the current policy CF8 (proposed for elimination in the update):** “Explore tools that encourage sufficient capital facilities and amenities to meet baseline goals for neighborhoods and to address needs resulting from growth.”

## **TRANSPORTATION AND PARKING**

**41. Do not delete goals LUG6, LUG6.1, and TG17 and policies LU20, LU49, LU, LU50, T-39, T-40, and T-46** that currently direct that parking policies “account for local objectives,” recognize parking as a part of “moving people and goods,” consider “access to local businesses,” “parking spillover into residential areas,” and “truck access and loading,” and not “introduce serious safety problems or blighting influences” but rather “achieve vitality of urban centers and urban villages” and “preserve Seattle’s competitive position in the region.” While deleting those goals and policies, the Comp Plan “update” would introduce two new policies: LU63 to “rely on market forces” for onsite parking and T40 to give higher priority in the allocation of street space to “greening” (e.g. on-street parks) over “storage” (the City’s new negative term for parking). *Effect of the proposed deletions and additions: reduces balance and sanity in parking policies.*

**42. Proposed policy TG9 should be amended to include improvements in the measure of transit level of service to reflect actual loads and the lack of space or sitting room on some bus routes.**

**43. The transit mode shares shown in proposed Transportation figure 1 need improvement.** The 2035 target for South Lake Union is only 55 percent, much lower than for Downtown (85 percent), the University District (85 percent), Uptown/Queen Anne (75 percent) and even Seattle overall (65 percent). Eastlake is deeply affected by increasing levels of traffic from the South Lake Union area.

**44. Do not delete two policies that support the maintenance and expansion of public stairways.** The proposed update would delete T32, “Recognize that stairways located within Seattle’s public rights-of-way serve as a unique and valuable pedestrian resource in some areas of the City. Discourage the vacation of public rights-of-way occupied by stairways, and protect publicly-owned stairways from private encroachment. And T33, “Accelerate the maintenance, development, and improvement of pedestrian facilities, including public stairways.” *Effect of the proposed deletions: public stairways would be neglected if their priority in the current Comprehensive Plan were to be erased.*

**45. Do not delete policies T8 and T70 to discourage damage from heavy vehicles and to finance the needed repairs.** The proposed update would delete T8, “Pursue strategies to reduce and help prevent road damage from heavy vehicles.” and T70, “Pursue strategies to finance repair of road damage from heavy vehicles in a way that is equitable for Seattle’s taxpayers.” Road and bridge use

by vehicles that are heavier than normal weight limits (causing exponentially greater damage than vehicles within normal weight limits) has caused hundreds of millions of dollars in unnecessary damage. The Comprehensive Plan is where these important policies need to be so that the City will take timely action to prevent such damage and will recoup some of the repair cost from those causing it rather than from Seattle taxpayers. *Effect of the proposed deletions: would weaken City efforts to address damage from heavy vehicles.*

## **NEW PROPOSALS**

**46. Add a new section on community involvement.** A serious omission throughout the history of the Comprehensive Plan has been the lack of a community involvement element. Such elements are in the comprehensive plans for Portland, San Francisco, Bellevue, Spokane, and Tacoma; Seattle should catch up. Public involvement is not something to be feared or avoided; it is a valuable resources for planners, and is a fundamental value in a democracy. Yet the proposed update does not reflect this value in what is proposing or in the way it is dealing with the public about the proposals. *Effect of the proposed addition: Policy decisions would be higher in quality because of public input, and would also be better understood and supported by the public.*

**47. Adopt a new policy to limit the “Airbnb” type of short term rental that is displacing affordable housing.** Other cities are grappling with this issue, and Seattle needs to.

**48. Require public facilities and infrastructure to keep pace with growth and growth targets.** *Effect of the proposed addition: concurrency of growth with the facilities it requires. See the City Neighborhood Council letter for details.*

**49. Direct growth to where it is needed and can be accommodated.** Discourage building in urban centers and urban villages that have met their growth targets or whose infrastructure is under capacity. Encourage building in urban centers and urban villages that have fallen short of their growth targets or whose infrastructure has unused capacity. *Effect of the proposed addition: greater equity in sharing the impacts of growth and of investment. Greater incentive for investment in and maintenance of infrastructure.*

**50. Reinstate Policy L61 from the 1994 Comprehensive Plan.** The 1994 Comp Plan ordinance section L61 (pages 29-30 of the original document, but pages 35-36 of the [PDF scan of Ordinance No. 117221](#)) required the City to “monitor development activity annually to identify situations where the rate of growth is different from that anticipated by growth targets, either because: 1) it is occurring too rapidly and may be disruptive; or 2) there is insufficient growth to achieve planned conditions in designated villages.” This section L61 also required the City to “initiate ... a special review procedure” which “should include a review process with the affected community” that shall “consider the following, or other appropriate actions, if a determination is made that action is needed to address the rate of growth:

- a. Provide resources to ensure rapid completion or revision of a neighborhood plan to better address how growth is to be attracted or discouraged;
- b. Propose rezone actions or changes to development standards to reduce development activity, or, depending on the circumstances, increase development opportunities;

- c. Make commitments for specific public improvements to mitigate the impacts of added growth or as incentives to attract desired growth; and/or establish annual development targets to more closely monitor the rate of growth in the affected area.”

*Effect of the proposed reinstatement of policy L-61 from the 1994 Comprehensive Plan: would honor a promise made when the urban centers and urban villages were first established—namely that growth will occur where it can best be accommodated and is most wanted.*

**Conclusion.** We hope that City officials will take the above suggestions to heart and will adopt them in the update of Seattle’s Comprehensive Plan.

Sincerely,



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cc: Lake Union District Council and City Neighborhood Council