

June 11, 2025

MEMORANDUM

To: Select Committee on the Comprehensive Plan
From: Lish Whitson, HB Harper, Ketil Freeman, Analysts
Subject: The Comprehensive Plan's Growth Strategy Element

On June 13, the Select Committee on the Comprehensive Plan will discuss [Council Bill \(CB\) 120993](#), permanent legislation implementing 1) Engrossed Second Substitute [House Bill \(HB\) 1110](#), 2) other State mandates, and 3) policies in the One Seattle Comprehensive Plan's Growth Strategy Element (see [CB 120985](#)).

This memorandum provides a brief summary of the Growth Strategy Element of the Comprehensive Plan. It then discusses the following topics as issues for consideration in review of CB 120985:

1. Neighborhood, Urban and Regional Center Locations and Boundaries
2. Frequent Transit Corridors
3. Places with Critical Areas or other Limitations

Considerations discussed in this memo are intended to highlight the types of choices the Council collectively or individually could make in deciding how to balance the benefits and burdens associated with accommodating residential and employment growth over a 20-year horizon. For most considerations identified over the course of Council deliberations there are not correct or incorrect approaches, rather there are policy judgments about competing priorities that may vary person-to-person.

Growth Strategy Summary

The Washington State Growth Management Act ([RCW 36.70A](#)) requires the City of Seattle to plan for 20 years of growth, as determined by regional governance organizations. For the planning period 2019 – 2044, King County's Countywide Planning Policies (CPPs) allocate to Seattle a target of 112,000 new housing units and 169,500 new jobs, which represent approximately 36 percent and 35 percent of anticipated residential and employment growth, respectively, countywide for the 25-year planning period.¹ Seattle's current targets, adjusted for growth in the intervening years, are 80,000 new housing units and 159,000 new jobs. This summary discusses zoned capacity; the growth strategy, with a focus on geographies that will accommodate future residential growth; and the relationship of the growth strategy to areas served with high-capacity transit and frequent transit.

¹[2021 King County Countywide Planning Policies](#) (last amended December 23, 2025 and ratified April 2, 2025), Table DP-1, p.23.

Zoned Capacity

In 2021, Seattle had zoned capacity to accommodate approximately 172,000 new housing units and 246,000 new jobs.² Since the growth targets were first adopted, the City has absorbed some of that capacity by adding over 40,000 new housing units.³ However, the City has also added employment and residential capacity through changes to industrial zoning and will add further capacity in the future through required updates to regional center plans and light rail station area planning for the West Seattle Link Extension (WSLE) and the Ballard Link Extension (BLE). The Mayor’s proposed Comprehensive Plan contemplates a Citywide zoned residential development capacity for approximately 300,000 new homes. Implementation of HB 1110 alone will increase zoned capacity by approximately 65,000 units.

The Growth Strategy

The Growth Strategy element of the Comprehensive Plan answers the question of where residential and employment growth will be located, identifies a hierarchy of geographies (called “Place Types” in the Comprehensive Plan) to accommodate future growth and establishes policies for designating those geographies and accommodating growth within those geographies.

Those geographies include Regional Centers, Urban Centers, Neighborhood Centers, Manufacturing and Industrial Centers, and Urban Neighborhoods.⁴ Regional Centers, Urban Centers, and Manufacturing and Industrial Centers are all geographies the designation criteria for which are defined in the CPPs.⁵ Neighborhood Centers and Urban Neighborhoods are Seattle-specific geographies.

A table summarizing proposed policies related to Regional Centers, Urban Centers, Neighborhood Centers, and Urban Neighborhoods is set out below. The proposed Future Land Use Map (FLUM) from the Comprehensive Plan showing the locations and boundaries of these geographies, which is the mapped policy that guides future zoning decisions to implement the plan, is Attachment 1 to this memorandum.

² [2021 King County Urban Growth Capacity Report](#), June 2021. Exhibit 31, p.51.

³ [Quarterly Report Dashboard - Residential Permitting Trends](#).

⁴ Other areas identified in the growth Strategy Element include major Institutions, which are hospitals, colleges, and universities; industrial areas outside of Manufacturing and Industrial Centers; parks, and open space; and cemeteries.

⁵ [2021 King County Countywide Planning Policies](#) (last amended December 23, 2025 and ratified April 2, 2025). Appendix 6, p. 106.

Planning Geography (Place Type)	Selected Proposed Policies
<p>Regional Centers (currently Urban Centers)</p> <ul style="list-style-type: none"> ▪ Seven Regional Centers ▪ Regional Centers have specific estimates for new housing units and jobs 	<p>Designate as Regional Centers places of regional importance due to the presence of substantial housing, office, retail, and/or entertainment uses at higher densities and access to regional transit. (GS 3.1)</p> <p>Allow a wide range of higher-density housing types in Regional Centers. High-rise tower construction may be appropriate in Regional Centers. (GS 3.3)</p>
<p>Urban Centers (currently Urban Villages)</p> <ul style="list-style-type: none"> ▪ 25 Urban Centers ▪ One new Urban Center proposed: Pinehurst-Haller Lake 	<p>Designate as Urban Centers those areas that play an important citywide role with a wide range of housing, jobs, shops and services, and access to regional or local transit. Areas with light rail stations outside Regional Centers should generally be designated as Urban Centers unless major topographic constraints or industrial zoning would limit growth in these areas. (GS 4.1)</p> <p>Allow a wide range of housing types in Urban Centers. Urban Centers should generally allow buildings of 3 to 8 stories. Buildings greater than 8 stories may be appropriate in Urban Centers near significant transit investments, especially light rail stations, or near existing concentrations of amenities and services. (GS 4.3)</p> <p>Allow various sizes of Urban Centers based on local conditions, but generally include those areas within a 10-minute walk (half-mile) of a current or future light rail station or 8-minute walk (2,000 feet) of the central intersection if no light rail exists. (GS 4.5)</p>
<p>Neighborhood Centers</p> <ul style="list-style-type: none"> ▪ 30 Neighborhood Centers Proposed 	<p>Designate as Neighborhood Centers areas with a locally focused commercial core and/or access to frequent transit where diverse housing options could allow more people to live within walking distance of shops, services, transit, and amenities. (GS 5.1)</p> <p>Zoning in Neighborhood Centers should generally allow buildings of 3 to 6 stories, especially 5- and 6-story residential buildings to encourage the development of apartments and condominium. (GS 5.3)</p> <p>Determine the boundaries of Neighborhood Centers based on local conditions, but generally include areas within a 3-minute walk (800 feet) of the central intersection or bus rapid transit stop. (GS 5.4)</p>
<p>Urban Neighborhoods</p> <ul style="list-style-type: none"> ▪ Primary geography for HB 1110 implementation – middle housing ▪ Can include corner stores 	<p>Designate as Urban Neighborhood those areas outside centers that are appropriate for primarily residential development with limited non-residential uses. (GS 6.1)</p> <p>Allow a mix of lower-scale housing types, generally up to 3 stories, such as detached homes, duplexes, triplexes, fourplexes, sixplexes, stacked flats, and cottage housing throughout Urban Neighborhoods. (GS 6.2)</p> <p>Allow moderate-scale housing of 4 to 6 stories in areas currently zoned for such housing and along arterials where zoned densities may be increased to provide more housing options near frequent transit. (GS 6.3)</p>

High-Capacity Transit and Frequent Transit

The growth strategy and designation of geographies is informed by and supportive of the regional and local transit network. The CPPs require that Regional Centers have existing or planned high-capacity transit and that Urban Centers have existing or planned high-capacity transit, which can include Bus Rapid Transit (BRT), or frequent transit with at least 15-minute headways for 16 hours per day.¹ New or expanded Regional Centers and Urban Centers are informed by requirements for these geographies related to walksheds to transit stops.

Seattle-specific geographies are similarly designated through consideration of proximity to frequent transit. Among other factors, Neighborhood Centers are designated through proximity to transit, including locations within a 3-minute walk of BRT stops, and higher zoned densities are contemplated for areas identified as targeted for frequent transit. Targeted headways, which do not necessarily reflect current headways, are shown on the Frequent Transit Network Targets Map from the Seattle Transportation Plan: Transit Element, Attachment 2 to this memorandum.

Policy Considerations

Because, at a citywide level, Seattle's current zoning capacity can accommodate anticipated future growth, Council can consider changes to proposed planning geographies without running the risk of reducing capacity below the allocation prescribed by the CPPs.

In making amendments, the Council can rely on district-specific knowledge or other factors² to modify boundaries of planning geographies or to increase or decrease the number and location of some types of planning geographies. Such changes could include adding or reducing the number of Neighborhood Centers or modifying the boundaries of proposed planning geographies.

However, there are some limits to Council's consideration of any amendments to planning geographies. Those include:

1. Whether proposed changes to boundaries of Regional or Urban Centers, the designation criteria for which are prescribed by the CPPs, would cause the Regional or Urban Center to be ineligible for its countywide designation; and
2. Whether the proposed changes are within the scope of environmental review documented in the Final Environmental Impact Statement.

¹ Ibid.

² The Office of Planning and Community Development (OPCD) in making changes to boundaries to planning geographies considered environmental factors, historic resources, infrastructure constraints, and access to transit and amenities.

High-Capacity Transit

The growth strategy contemplates expanded boundaries for proposed Regional and Urban Centers and locations for new Neighborhood Centers based on proximity to existing investments in high-capacity transit. For example, the Growth Strategy contemplates an expansion of the First Hill / Capitol Hill regional center and proposes new Neighborhood Centers based on the location of completed BRT facilities. The growth strategy also contemplates expansions to Urban Centers based on planned, but not completed investments in high-capacity transit, such as creation of a Graham Urban Center around the location of the planned light rail station. However, there are other areas that are planned to be served by high-capacity transit that are not contemplated for a designation as Urban Centers. For example, the Smith Cove station area of the WSLE is proposed to remain part of the Ballard-Interbay-Northend Manufacturing Industrial Center. Designations for such areas could follow station area planning efforts.

Council could consider whether to modify proposed center designations or adjust center boundaries based on an assessment of progress towards delivery of high-capacity transit and how that delivery may change over the 20-year planning period.

Frequent Transit Corridors

Proposed center designations, including those for Neighborhood Centers, are informed by the Frequent Transit Network Targets Map from the Seattle Transportation Plan. That map shows targeted transit headways of between less than 10 minutes and 15 minutes by transit corridor. However, targeted headways do not necessarily correspond with current service levels.

The City's current map of frequent transit areas, which is used to determine whether a development is exempt from parking requirements, does not include some areas targeted for frequent transit service that are proposed for Neighborhood Centers or expanded Urban Centers.³ For example, the Admiral Urban Center is not mapped as currently having frequent transit service and proposed Neighborhood Centers in Magnolia and Madison Park, which are targeted for frequent transit service with 15 minute headways, do not currently provide transit service at that level. However, service at that level may be provided in the future. The City purchases additional transit service from King County Metro with sales tax revenue levied through the Transportation Benefit District. Achieving transit frequencies contemplated by the Comprehensive Plan will require an ongoing commitment of resources that exceed current levels of investment.

The frequency of current transit service is not a dispositive factor in designating Neighborhood Centers, other factors such as access to neighborhood amenities, like access to parks, shops and services contribute to the designation. In addition, the plan seeks to designate centers across the city to provide opportunities for residential development close to public facilities and services in all neighborhoods.

Council could consider the extent to which transit frequency plays a role in individual center designations and add or remove neighborhood centers or modify the boundaries of centers based on current or planned transit frequency.

³ Frequent transit service areas are established by Seattle department of Construction and Inspections Director's Rule. Current frequent transit service areas are set out in [SDCI DR 3-2023](#). The Land Use Code defines frequent transit service as having 15-minute average headways between 6 a.m. and 7 p.m. – 13 hours per day. See [Seattle Municipal Code Section 23.84A.038](#). The CPPs define frequent transit service as 15-minute headways 16 hours per day. [2021 King County Countywide Planning Policies](#), Table DP-1, p.23.

In addition to the role of frequent transit service as one criterion in locating Neighborhood Centers, Policy GS 6.3 provides for upzones along arterials with frequent transit routes in urban neighborhoods, outside of centers. This is intended to focus growth along the route. Alternatives 4 and 5 of the Comprehensive Plan Environmental Impact Statement analyzed upzones within a ten-minute walk of frequent transit, rather than only rezoning parcels facing the arterial. Amending this policy to reflect Alternative 5 would provide additional opportunities for growth across the City, and reduce development pressure in any single area. It would also increase opportunities for stacked flats.

Places with Critical Areas or Other Limitations

Seattle's natural and built environment contain both environmentally critical areas and active non-residential land uses and physical infrastructure that can be incompatible with residential use and development.

Examples of environmentally critical areas include areas that are hazardous for development, such as areas with steep slopes, areas that are landslide prone, and flood prone areas, and areas with habitat value for plants and animals, such as riparian corridors and fish and wildlife conservation areas. Development within these areas is governed by regulations for Environmentally Critical Areas⁴ and other environmental regulations.

Examples of active non-residential uses and physical infrastructure that can be incompatible with residential uses include areas that experience more air pollution due to proximity to roadways with higher volumes of vehicle traffic and areas that experience higher sustained noise levels due to noisy land uses like the King County Airport.

The growth strategy contemplates expanding Urban Centers and adding new Neighborhood Centers in areas that are wholly or partially characterized by either environmentally critical areas or potentially incompatible land uses. Because Seattle is fully urbanized, these circumstances already exist in current land use patterns. For example, portions of the Greenwood Urban Center are located within a peat settlement prone area and the proposed Georgetown Neighborhood Center, which is in an area with existing residential uses, is located within 1000 feet of Interstate 5 and beneath the approach to the King County airport.

Council could consider whether to add or remove centers or modify the boundaries of centers based on proximity to environmentally critical areas or to mitigate potential health impacts to future residents.

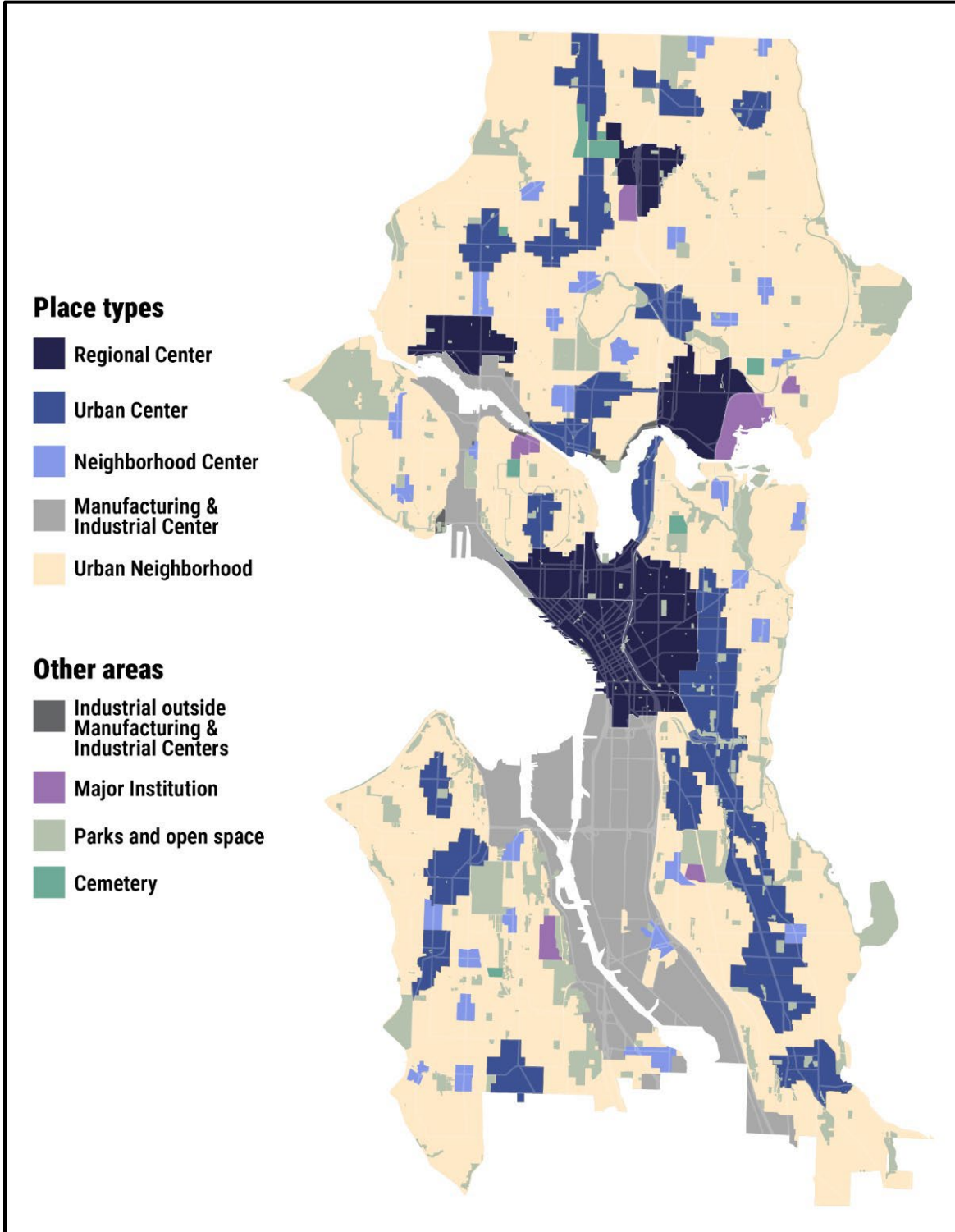
Attachments:

1. Future Land Use Map
2. Frequent Transit Network Targets
3. Frequent Transit Service Areas for Parking Exemptions

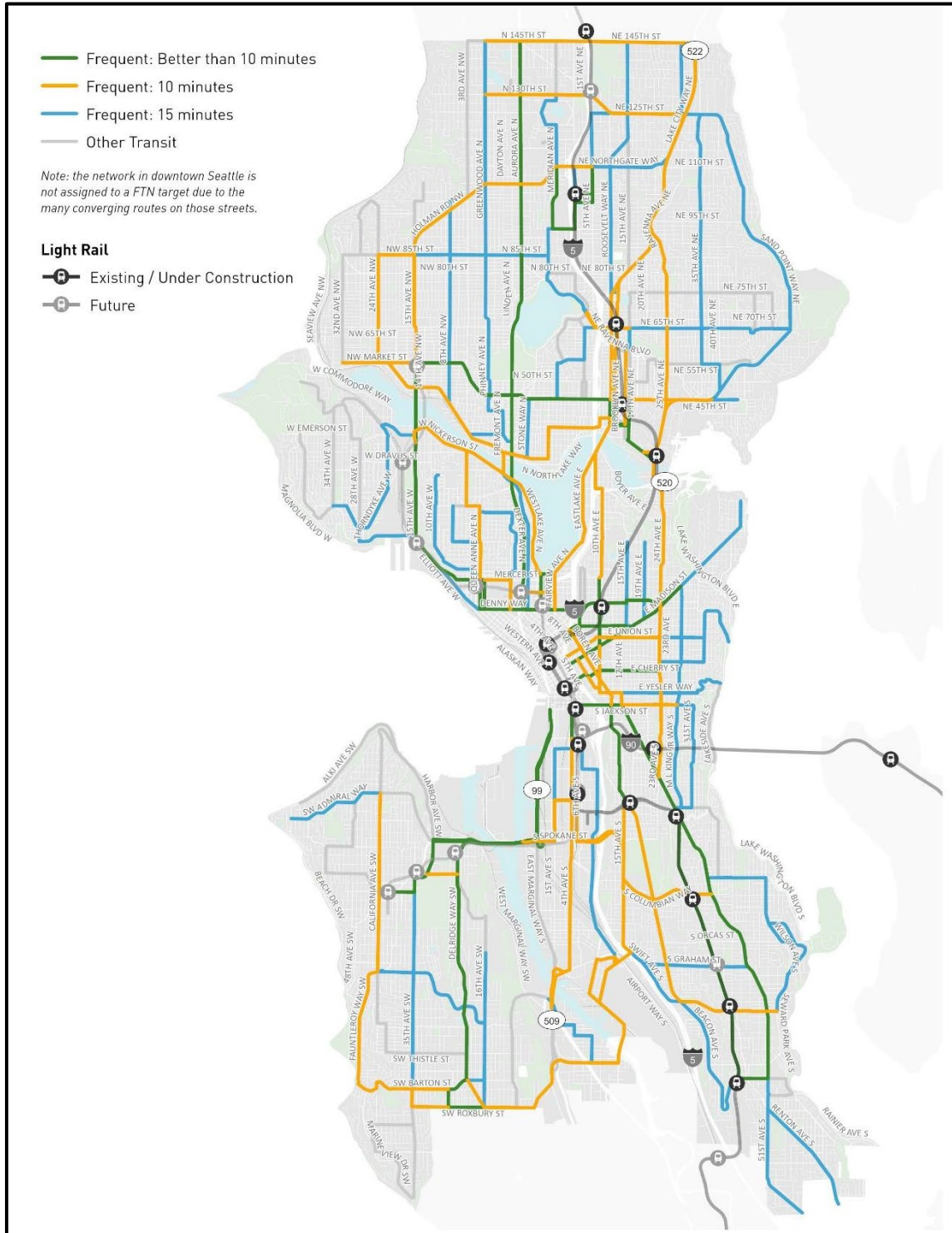
cc: Ben Noble, Director

⁴ [Seattle Municipal Code Chapter 25.09](#).

Attachment 1 – Future Land Use Map



Attachment 2 – Frequent Transit Network Targets



Attachment 3 - Frequent Transit Service Areas For Parking Exemptions

