

# Introduction and Background

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# Chapter 1 – Introduction and Background

## Introduction

Development of the Draft and Final Environmental Impact Statements (DEIS/FEIS/EIS) for the 2044 Shoreline Comprehensive Plan has involved the following steps:

1. Scoping: Scoping meeting open to the public and agencies and a 30-day public and agency comment period. The public, tribes, and local, state, and federal agencies are invited to comment on the proposal, alternatives, impacts, and potential mitigation measures to be further studied in the DEIS.
2. Analysis for the DEIS: Analysis of potential impacts of the proposal and reasonable alternatives.
3. Publishing of DEIS: Publishing of the DEIS for review and comment by the public and agencies.
4. Development and issuance of this FEIS, which responds to comments received on the DEIS (Chapter 10) and provides additional content and corrections to the DEIS in each chapter.

Potential impacts analyzed under the alternatives were studied programmatically within the following topic areas, as further addressed in Chapters 4 through 9:

- 4 Consistency with Plans and Policies
- 5 Land Use Patterns, Built Form, Housing, and Employment
- 6 Natural Environment
- 7 Transportation
- 8 Public Services
- 9 Utilities

The FEIS adds a tenth chapter: 10 Responses to Comments on the DEIS.

The DEIS and FEIS are documents of reference for the 2044 Comprehensive Plan concurrently undergoing formal review as part of the adoption process. The DEIS and FEIS are not subject to formal adoption. Rather, they are supportive documents to the 2044 Comprehensive Plan, which serves as “the proposed action/proposal” the City is reviewing to determine action (in this case, the action would be adoption of the 2044 Comprehensive Plan to serve as a guide for growth, planning, and implementation of infrastructure improvements and services in Shoreline for the next 20 years).

## Purpose and Objectives of the Proposed Action

As required by the Growth Management Act, Chapter 36.70A RCW (GMA), the City of Shoreline has completed draft amendments and updates to its comprehensive plan with the intent to create a new plan that guides growth in Shoreline for the next 20 years—the Shoreline 2044 Comprehensive Plan—Picture It! Plan It! Build It! The City completed the previous programmatic DEIS for the comprehensive plan and published the DEIS for public and agency review on October 15, 2024.

The DEIS analyzed the environmental impacts of amendments submitted by the public, agencies, and the City through the annual docketing process. The 2024 docket was considered by the Planning Commission and Council and includes the following items:

1. Adopt the Major Update of the 2024 Comprehensive Plan.
2. Adopt a new Parks, Recreation, Open Space, and Arts Element.
3. Amend the Comprehensive Plan Land Use Map Designation of the Department of Natural Resources (DNR) Owned Portion of the Fircrest Campus From Campus to a designation more appropriate after study has been completed.
4. Add a new Community Design Policy – “Assure that any residential street with a public ROW greater than 60 ft and all undeveloped City rights-of-way be considered for use as a “Green Streets” or local pathways to supplement city parks, tree canopy and benefits of access to the natural environment while reducing the need to purchase land”.
5. Revise Map in the Transportation Element – Figure 7 - Existing Sidewalks.
6. Add a New Transportation Element Policy under the subheadings of Pedestrian System, Bicycle System, and Transportation Improvements, that states, “Work with regional partners and the community to locate, design, fund, and construct a shared bicycle and pedestrian bridge across N. 205th Street (SR 104) to connect, for safe crossing, the City portion of the Interurban Trail with the City of Edmonds portion of the Interurban Trail”.

The updated comprehensive plan will help guide decision making and actions citywide over the next 20 years and encompasses the outcomes from recently completed functional plans in addition to amending various elements to reflect community values, current conditions, and legal mandates. The DEIS and FEIS were developed to understand potential impacts and needed mitigation measures to address various levels of growth that may occur over the next 20 years. Consistent with the requirements of the Washington State Department of Ecology (DOE) pertaining to the State Environmental Policy Act (SEPA), the DEIS and FEIS provide a *programmatic* level of analysis given that the comprehensive plan is a “non-project” action.

The DEIS and FEIS were developed in alignment with SEPA as administered through the Washington State DOE. As stated in the *SEPA Handbook*, “*The Primary purpose of an EIS is to provide an impartial discussion of significant environmental impacts, and reasonable alternatives and mitigation measures that avoid or minimize adverse environmental impacts. This environmental information is used by agency officials – in conjunction with applicable development regulations and other relevant information – to make decision to approve, condition, or deny the proposal.*”

The following objectives apply to the alternatives analyzed in the DEIS (with the outcomes of the analysis republished in this FEIS):

1. Ensure compliance with the provisions of the Washington State Growth Management Act (GMA) as administered by the Washington State Department of Commerce, King County Countywide Planning Policies (CPPs), and the Puget Sound Regional Council regional plan—VISION 2050 that also includes Multi- County Planning Policies (MPPs).

2. Update and refine the goals, policies, and strategies in Shoreline’s GMA-compliant Comprehensive Plan to implement the community’s vision statement and accommodate the future needs of the community as it grows.
3. Support a mix of housing types affordable to all levels in compliance with state legislative requirements.
4. Support a mix of employment types, including retail, commercial services, office, and medical services.
5. Provide for multimodal transportation improvements and infrastructure to support the community’s vision, plans, and policies.

## Alternatives Evaluated

The DEIS analyzed the potential impacts of three different alternatives for future growth through the year 2044 and identified mitigation measures to address potential impacts related to the two action alternatives (Alternative 2 and Alternative 3). The FEIS republishes the outcomes of this alternatives analysis.

- **Alternative 1—No Action Alternative:** This alternative provided a basis of understanding what the implications of not taking action may be—in this case, not updating the comprehensive plan. The City does not intend to pursue this course, but SEPA requires study of a “No Action” alternative.
- **Alternative 2—Moderate Pace of Growth:** This alternative assumed that the level of growth that occurs over the next 20 years would be consistent with the growth targets allocated to Shoreline by King County.
- **Alternative 3—More Rapid Pace of Growth:** This alternative assumed that the same level of growth analyzed under Alternative 2 would occur more rapidly – such as in 10 years, rather than 20, and that the same level of mitigation, projects, and improvements would be needed, but within a shorter timeframe to serve that growth.

Refer to Chapter 2—Proposal and Alternatives for additional information including assumed levels of population, housing units, and jobs for the alternatives.

## Description of the Study Area

Shoreline is located in King County, Washington, situated north of Seattle within the Metropolitan area and the greater Puget Sound region. Shoreline is bordered by Edmonds to the north, Lake Forest Park to the east, Seattle to the south, and the Puget Sound shoreline and waters to the west. The city spans approximately 11 square miles and offers residents a blend of urban and suburban features due to its proximity to Seattle and access to major transportation routes, including Interstate 5 and State Route 99; light rail and Bus Rapid Transit networks; and its location on the Interurban Trail with connections to the Burke-Gilman and the Trail Along The Rail segments being built out as part of the regional bicycle network.

Shoreline is characterized by its well-established neighborhoods, extensive local parks, and a variety of community amenities. The city’s comprehensive park system includes popular spots like Richmond Beach

Saltwater Park and Kruckeberg Botanic Garden. The City of Shoreline fosters a strong commitment to the environment through many programs and adopted an updated Climate Action Plan in December 2022.

The local economy is diverse, featuring a mix of small, locally owned businesses, larger enterprises, and a range of service-oriented establishments. Shoreline's community is supported by a well-regarded school system, community college, and active local organizations that contribute to its desirable livability.

Shoreline's strategic location with convenient regional transit access, major transportation corridors, links to the regional trail networks, alongside its proximity to Seattle and the University of Washington, make it an attractive option for those seeking livable neighborhoods in proximity to urban destinations. The city was recognized by Seattle Magazine in 2005 and 2008 as the Best Place to Live for its school system, parks, commute time, affordable homes, and "booming business community. In 2024, Fortune Magazine ranked Shoreline at number 21 in the nation, the only city in Washington to be included in its 50 Best Places for Families. As the city continues to transform, it maintains a focus on enhancing quality of life, fostering community engagement, and promoting sustainable development.

In addition to its geographical and infrastructural attributes, Shoreline is a community with evolving demographic and socioeconomic characteristics. The city's population is diverse and continues to grow, bringing dynamic changes to housing, education, and public services. Shoreline 2044, the Comprehensive Plan addresses these changes to guide the future development in a sustainable and inclusive manner over the long term of the next 20 years.

The study area for the Comprehensive Plan and EIS consists of the entire city limits. See **Figure 1.1**.

## **Environmental Review and SEPA Process, Scoping, and Public Involvement**

### **Purpose of Environmental Review**

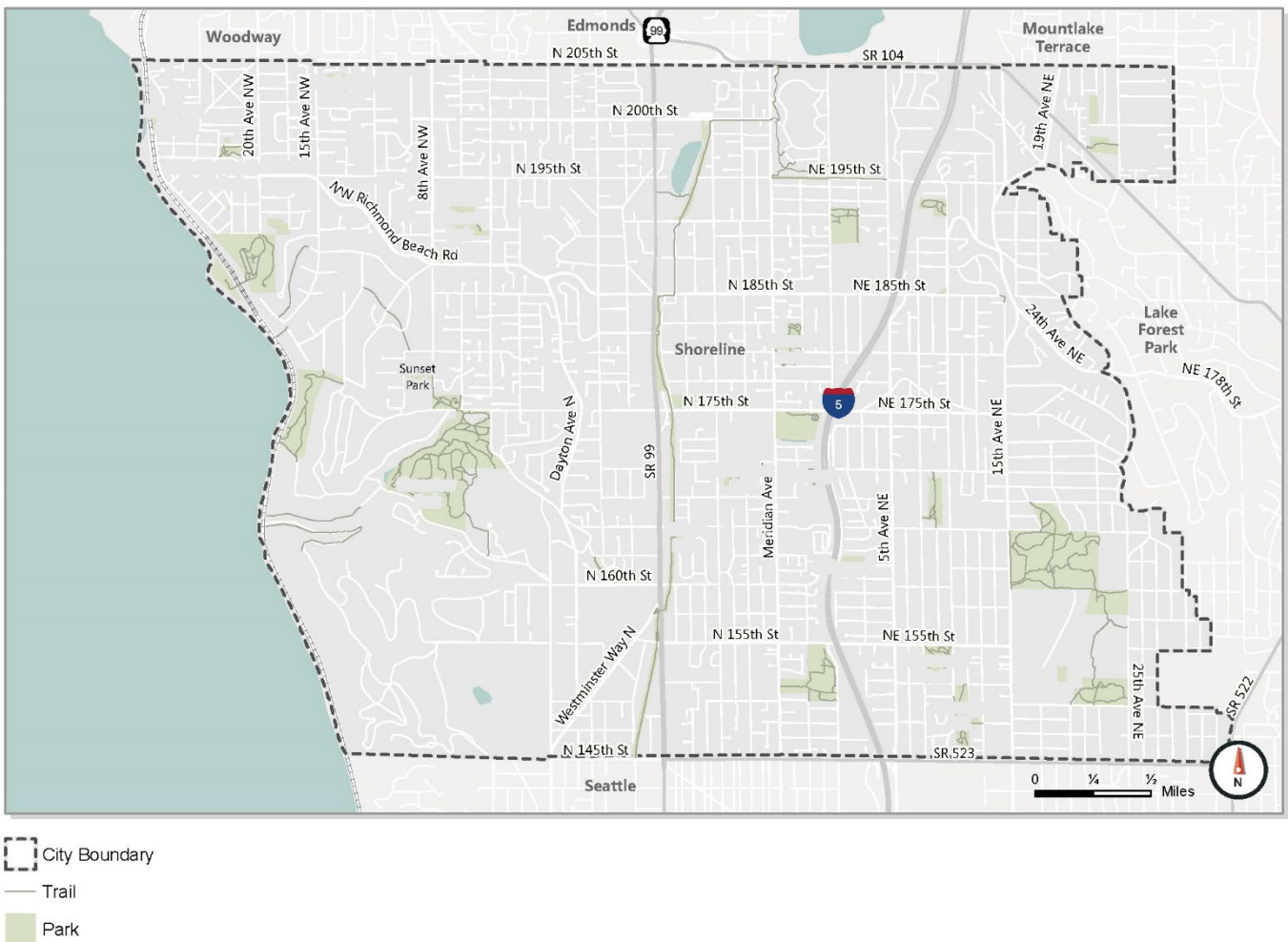
The State Environmental Policy Act (SEPA), enacted in 1971, is a process designed to study the environmental consequences associated with governmental decisions. These decisions encompass a wide range of activities, including the issuance of permits for private projects, the construction of public facilities, and the adoption of regulations, policies, and plans. Environmental impacts must be deliberately studied whether the decision is initiated by private entities or the government itself. Certain land use actions qualify for "categorical exemption" and are exempt from SEPA review, as outlined in WAC 197-11-720 and WAC 197-11-800.

For proposals subject to SEPA review—whether "project actions," such as constructing public buildings or infrastructure, or private projects, or "non-project actions," such as crafting plans, ordinances, programs, or administrative rules—the lead government agency must undertake a "threshold determination." This assesses whether the project is likely to yield significant adverse environmental effects. Detailed regulations governing this review process are established by the Department of Ecology under chapter 197-11 WAC.

The threshold determination yields either a Determination of Nonsignificance (DNS) or a Determination of Significance (DS). In cases where there could be the potential for impacts, a Determination of Significance is issued, and preparation of a comprehensive environmental impact statement (EIS) is required. Preparation of an EIS for non-project actions, such as comprehensive plans, is also advised when there has been an extended timeframe from the previous related EIS, which is the case for Shoreline. The initial Comprehensive Plan EIS was developed in 1998, created with the City’s first comprehensive plan after incorporation. Since that time the Town Center Supplemental EIS, North City Supplemental EIS, 145<sup>th</sup> and 185<sup>th</sup> Light Rail Station Subareas Planned Action EISs, and various other SEPA documents have been developed. Completion of this EIS process provides the opportunity to bring the City’s programmatic citywide planning work into updated compliance with SEPA.

Through the SEPA review process, agency decision-makers, applicants, and the public gain insights into how proposed actions may impact the environment. The SEPA process provides the opportunity to inform public and agencies about proposed actions and reasonable alternatives, potential impacts, and related mitigation measures and supports the decision-making process for plan review and adoption.

**Figure 1.1 Map of the City of Shoreline**



## Scoping and Public Engagement

The City issued a Scoping Notice on November 1, 2023, requesting comments on the scope of the EIS from the public and agencies and provided an open 30-day comment period through November 30, 2023. Scoping and the related public comment period were noticed through official publications, announcements on the City's website, social media, and email announcements.

A public open house was held on November 15, 2023 during the scoping period. A summary of comments gathered through the scoping period is provided below. These comments helped to inform the importance of topics to be addressed in the DEIS. A full report on SEPA Scoping and related documentation, as well as scoping outcomes is provided in the Appendix.

- Continue to prioritize the preservation of Shoreline's urban tree canopy.
- Continue to increase housing types and densities as a means to reducing housing costs. Continue to increase housing densification near light rail stations and public transit.
- There also were perspectives shared about concerns related to traffic and too much density in some areas.
- Preserve green spaces and continue to provide high quality parks and recreation opportunities.  
Specific opportunities mentioned:
  - Enhancement of park safety, especially during nighttime hours.
  - Expand bike and pedestrian paths across the City that are separate from the main roads and develop a trail system that creates more access to public transit
  - Diversify the types of recreation that the park system can offer (such as engaging play areas, pump tracks/bike recreation, walking trails, and sports facilities such as pickle ball and basketball courts).
  - Expand stewardship programs for the parks, pay park stewards, or hire enough staff to ensure the proper maintenance of the parks.
- Work on the recruitment of businesses and diversification of businesses in Shoreline.
- Create Mixed-Use nodes that have ground-floor commercial retail space.
- The implementation of neighborhood commercial, mixed-use nodes will hopefully help create a stronger sense of place. In strengthening the sense of place and enhancing the commercial nodes, the public has shared that they would like to see better pedestrian access for these spaces.
- Improve connectivity to the light rail stations and build a network of interconnected, safe, and direct bike and pedestrian routes throughout the city (and continue to improve walkability throughout the city).
- Public safety was an important area of emphasis in the comments with recommendations to ensure that the public safety oversight is properly scaled according to the increase in population, hiring more police officers, fire, EMT, and other staff and providing a focus on diversity and equity training.
- Consider changing norms with regard to work environments when contemplating changes to zoning or other policies related to office uses.

The DEIS was published for public review from October 15, 2024 through 5:00 pm November 14, 2024, open for a 30-day public and agency comment period. Public comments received on the DEIS during the comment

period are responded to in Chapter 10 of this FEIS. A public hearing for the DEIS was held on October 24, 2024 in the City Council Chambers at Shoreline City Hall. No public comments were submitted at the public hearing.

### Comprehensive Plan Engagement Summary

The City has completed a robust program of community engagement for the Comprehensive Plan, engaging residents and diverse interests through various methods to inform community members about the 2044 update and collect input that would shape the draft plan. Shoreline City Council approved a Public Participation Plan outlining these methods.

The goal of this engagement effort was to raise awareness among Shoreline residents about the purpose, need, and value of the Comprehensive Plan. The City sought to ensure that community members had opportunities to provide feedback and communicate their priorities, preferences, and needs. Additionally, the City aimed to make the content easy to understand, engaging, and accessible for all audiences.

Community engagement began early in the comprehensive planning process, and spanned across two years with three distinct phases: visioning, focused engagement, and drafting the plan. Activities were structured to gather community member’s general input on the values and perceptions of Shoreline, which the City used to develop its long-term vision.

#### Overview of Engagement Activities



The City made an active effort to engage with all Shoreline residents. Additionally, there was an intentional focus on engaging with and elevating the voices of residents who have been historically excluded in planning efforts, such as people of color, Native and Indigenous peoples, people in low-income households, and people who speak a language other than English at home. These groups have been disproportionately, and negatively impacted by decisions related to urban planning, zoning, housing, and other key policy areas, so these groups were identified as primary audiences.

#### Key Themes Heard Across All Phases of Engagement:

Several recurring themes emerged from across feedback shared by Shoreline community members. The most prevalent themes included:

- **Safety:** Many Shoreline residents have concerns related to safety. Shoreline community members would specifically like the City to prioritize improving upon residential and personal safety, as well as vehicle and pedestrian safety.
- **Nature and the environment:** There is shared sentiment throughout Shoreline that the City’s natural habitats, wildlife, and trees should be preserved, and that green spaces should be more prevalent.



- **Housing affordability and diversity:** Shoreline community members feel that there is currently a lack of housing options for diverse income levels. Residents feel that there are limited options for people with disabilities.
- **Employment Opportunities:** Shoreline residents would like to see an increase in job opportunities. The City also heard several residents advocate for greater prioritization of economic development in a more general sense.
- **Goods and services:** The City heard from many community members that they would like to see increased access to goods and services, ranging from retailers to medical providers.
- **Community programming:** Shoreline residents would appreciate access to more community events and recreational opportunities. There is a shared sentiment that these improvements would help foster an increased sense of community and connections throughout the city.

A full report on the community engagement efforts conducted during the comprehensive plan update process and related outcomes is provided in the Appendix to the 2044 Shoreline Comprehensive Plan.

## Summary of Past SEPA Actions Related to Planning and Project Approvals

The DEIS and FEIS were developed with reference to past SEPA actions and documents, including the following environmental analyses, some of which were programmatic/non-project actions and others that were project-specific and planned action environmental reviews.

### Ordinance 609 – Town Center Subarea Planned Action and Related SEPA Compliance

A Planned Action Environmental Impact Statement (Planned Action Ordinance No. 609) was prepared in 2008 for the Town Center Subarea Plan and Town Center Code. The EIS addressed environmental impacts as well as three alternatives for the Park at Town Center. This occurred early in the process to facilitate and expedite the environmental review of future development projects. Thus, detailed, and comprehensive environmental analysis occurred during the planning stage, thereby streamlining the SEPA review process for this Subarea. The Town Center Planned Action Ordinance was adopted in 2011. For more information visit: <https://www.shorelinewa.gov/home/showpublisheddocument/10847/635180312688300000>

### 2012 Comprehensive Plan SEPA Determination of Nonsignificance

For the 2012 Shoreline Comprehensive Plan, the City adopted a threshold Determination of Nonsignificance (DNS), determining that the Comprehensive Plan would not have a probable significant adverse impact on areas of the environment supported by a SEPA Checklist and reference to previously completed environmental analyses.

### Ordinance 705 – Planned Action Ordinance and Related SEPA Compliance for Aurora Square (Shoreline Place)

In September of 2012, the City of Shoreline enacted Resolution No. 333 to designate the Aurora Square area as a Community Renewal Area (CRA) and in July of 2013, the City enacted Resolution No. 345 adopting the Aurora Square Renewal Plan. The City recognized the CRA as a Planned Action and followed the EIS process to achieve efficiency in the permitting process. This encouraged economic growth and development while

promoting environmental quality. For more information visit:

<https://www.shorelinewa.gov/business/aurora-square-community-renewal-area>

### **Ordinance 707 – Planned Action Ordinance and Related SEPA Compliance for the 185<sup>th</sup> Street Station Subarea**

In 2014, the City of Shoreline completed an EIS on the 185<sup>th</sup> Street Station Subarea Plan Planned Action. The EIS studied environmental impacts and recommended mitigation related to the redevelopment alternatives in the subarea surrounding the light rail station located at NE 185<sup>th</sup> St. and I-5. The EIS focused on land use patterns/plans and policies, population, housing, employment, multi-modal transportation (roads, sidewalks, bike lanes, and transit), public services (schools, parks, recreation facilities, open space, police, fire and emergency services, and solid waste disposal), and utilities (water, wastewater, surface water, electricity, and communications). For more information visit: <https://www.shorelinewa.gov/government/projects-initiatives/light-rail-station-area-planning/185th-street-station-subarea-plan-and-feis>

### **Ordinance 752 – Planned Action Ordinance and Related SEPA Compliance for the 145<sup>th</sup> Street Station Subarea**

In 2016, the City of Shoreline completed an EIS on the 145<sup>th</sup> Street Station Subarea Plan Planned Action. The EIS studied environmental impacts and recommended mitigation related to the redevelopment alternatives in the subarea surrounding the light rail station located at NE 145<sup>th</sup> St. and I-5. The EIS focused on land use patterns/plans and policies, population, housing, employment, multi-modal transportation (roads, sidewalks, bike lanes, and transit), public services (schools, parks, recreation facilities, open space, police, fire and emergency services, and solid waste disposal), and utilities (water, wastewater, surface water, electricity, and communications). For more information visit: <https://www.shorelinewa.gov/government/projects-initiatives/light-rail-station-area-planning/145th-street-station-subarea-plan-and-feis>

## **Other Future Environmental Reviews and Analyses**

The DEIS (republished as this FEIS) provides a programmatic analysis of growth that may occur under the updated Shoreline Comprehensive Plan for 2024 through 2044. Individual project actions that have occurred in the past and that will occur in the future are subject to their own individual environmental reviews, impacts analyses, and threshold determinations, whether programmatic or project specific.

## **Consideration of Cumulative Impacts**

The State Environmental Policy Act directs lead agencies to consider potential cumulative impacts of proposed actions, including programmatic actions related to long range and comprehensive planning. While a “Cumulative impact” is not defined in the SEPA Rules, it is defined under federal rules implementing the National Environmental Policy Act (NEPA). “Cumulative impact” is defined in the Council on Environmental Quality (CEQ) Regulations as the “impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions” (40 CFR Part 1508).

Potential cumulative effects related to the City of Shoreline Comprehensive Plan (periodic update),

considered with other proposed actions or projects within the potentially affected area have been assessed, though it is impossible to predict if these would or would not occur and to what level over the long-term future. Urban growth under all alternatives could result in some cumulative significant and unavoidable impacts to the natural environment, specifically plants and animals. Citywide increases in population density and impervious surface area in a watershed generate cumulative impacts to plants and animals that cannot be wholly avoided even though environmental protections are in place, including surface water regulations through the Department of Ecology that would be mitigative.

Development under all alternatives would require some losses of vegetative cover, changes in hydrologic conditions, and habitat fragmentation, although many of the areas that would experience redevelopment are already developed or partially developed today in Shoreline. Existing regulations avoid, minimize, and mitigate impacts but may not eliminate these impacts entirely. Alternatives 2 and 3 would strengthen local regulations by updating the Comprehensive Plan environmental goals and policies and considering ways to increase climate resiliency relative to water quality and quantity.

Over time, overall activity levels and development intensities would increase and could result in cumulative impacts due to increased urban activity such as traffic, noise, and other related activities. Reduced trip lengths from concentrating growth in areas with good access to transit combined with improved future fuel economy assumptions under all alternatives would minimize increases to air pollution and greenhouse gas emissions despite increased growth.

Unavoidable adverse impacts including cumulating impacts under all alternatives could be mitigated through the various methods presented in this EIS and therefore are presumed to be moderate and not significant.

It is important to note that Washington courts have limited the requirement for cumulative impact analysis under SEPA. Based on the outcomes of [Boehm v. City of Vancouver](#), 111 Wn. App. 711 (2002), an analysis of the cumulative impacts of a proposed project is not required under SEPA unless (1) there is some evidence that the project will facilitate future action that will result in additional impacts or (2) the project is dependent on subsequent proposed development. A project's cumulative impacts that are merely speculative need not be considered. In the case of the Shoreline Comprehensive Plan as a programmatic action, there is the potential that cumulative impacts may result from future redevelopment actions; however clear evidence is lacking.

As required by the Growth Management Act and other statutes, as well as regional and county policies, existing and amended codes, standards, or regulations in Shoreline would regulate future development and redevelopment following this non-project action. It is anticipated that such development generally would be consistent with the alternatives analyzed in the DEIS (republished as this FEIS) and policy changes in the comprehensive plan. In addition, there are no current or existing projects that are functionally related or interconnected to this project (i.e., one could proceed without the other). Future projects and developments would be subject to project-level SEPA actions required to conduct separate, project-specific environmental analyses and review, as appropriate (unless covered through planned action SEPA ordinances). Mitigation measures for each project would also decrease the potential for cumulative impacts.

The EIS analysis also considers land use assumptions for the rest of the region, based on Puget Sound Regional Council (PSRC) growth targets, where applicable and reasonably foreseeable. Any cumulative impacts associated with additional regional growth, citywide growth, or growth implemented in the city's subareas beyond that evaluated in this EIS is merely speculative and need not be considered as part of this programmatic environmental review.

## Potential Areas of Controversy and Uncertainty and Issues to Be Resolved

As the City of Shoreline grows, there will be changes to the built environment, housing availability, natural environment, local economics, community aesthetics, and other conditions. There will also continue to be some uncertainty as to how fast growth may occur in the future, which stems from the variability of market factors and other factors that will drive and influence development in Shoreline over the next twenty years.

Overall, the intent of the EIS is to understand the scope of potential impacts associated with various alternatives so that the City can plan for these changes in the future. Key environmental issues and options facing decision makers include:

- While the pace of actual growth in the future is at this time unknown, development would be required to be in compliance with adopted zoning provisions and code requirements.
- The relationship of future development to the natural environment and land use compatibility may vary, however, all development would be required to comply with City zoning and code provisions.
- The effects of growth on demand for public services, utilities, parks, multimodal transportation, and other capital improvements would be expected to be the same under the action alternatives, but Alternative 3 anticipates that growth would occur more rapidly, and as such would necessitate implementation of mitigation measures, projects, and improvements on a faster pace than under Alternative 2.
- All alternatives would allow for new population, housing units, and employment growth and increased urbanization, but under the No Action Alternative, the City's comprehensive plan update would not be adopted, and as such would not be in alignment with the most recent state legislation, PSRC's VISION 2050 multicounty planning policies, nor King County's countywide planning policies.  
***However, the City does not intend to pursue this direction.***

This FEIS addresses the following.

- Responses to comments on the DEIS (see Chapter 10).
- Provision of additional content and corrections to the DEIS throughout all chapters.

Existing adopted land use and zoning provisions in Shoreline would allow for either of the two action alternatives (Alternative 2 or Alternative 3) to be implemented (or a growth level somewhere in between the two) over the next 20 years. Because of the variability of market factors and other influences on potential development, the rate of growth that would occur in Shoreline over the next 20 years is unpredictable.

***Therefore, a "preferred alternative" is not being identified among the alternatives studied. Rather, studying these variations provides information that will help the City plan for and be prepared to respond to multiple potential growth scenarios that could occur over the next 20 years.***

## **Benefits and Disadvantages of Delaying the Proposed Action**

Under SEPA, a discussion of the benefits and disadvantages of reserving for some future time the implementation of a proposal are required to be addressed compared with possible adoption at this time.

The benefits of adopting the updated Comprehensive Plan include:

- Planning for housing and employment growth in coordinated manner that aligns with regional and county planning and allocated targets. It should be noted that the City is planning for equitable growth and has assessed potential racially disparate impacts that have influenced past land use patterns in line with the provisions the HB 1220 legislation. Considerations related to equity and social justice have been integral to the comprehensive planning process.
- Providing guidance for pending and future functional plans that respond to future growth.
- Development of goals and policies, as well as improvements and services that address the needs identified to serve future growth.

If adoption of the updated Comprehensive Plan were to be delayed, growth would still occur (under the previously adopted plan and current zoning and code provisions). However, the previously adopted plan does not fully reflect new circumstances, new legal requirements, updated growth forecasts, and economic development opportunities. Delaying implementation could result in a lack of timely coordination of land use and capital facility planning on an ongoing basis as required under the GMA. Additionally, delaying implementation of the updated Comprehensive Plan (the proposal) would not be in compliance with the requirements of the GMA or regional and countywide planning. The Comprehensive Plan would not receive current/up-to-date certification by the state or endorsement by the region or county, which could have adverse legal and financial consequences for the City, such as the inability to apply for certain grant funding for various types of capital projects.