



city of  
**covington**  
growing toward greatness

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*The City of Covington is a destination community where citizens, businesses and civic leaders collaborate to preserve and foster a strong sense of unity.*

## **PLANNING COMMISSION AGENDA**

**February 5, 2015**

**6:30 PM**

CALL TO ORDER

ROLL CALL

Chair Sean Smith, Vice Chair Paul Max, Jennifer Gilbert-Smith, Ed Holmes, Bill Judd, Alex White, & Jim Langehough.

PLEDGE OF ALLEGIANCE

APPROVAL OF CONSENT AGENDA

### 1. Planning Commission Minutes for January 15, 2015 (Attachment A)

**CITIZEN COMMENTS** - *Note: The Citizen Comment period is to provide the opportunity for members of the audience to address the Commission on items either not on the agenda or not listed as a Public Hearing. The Chair will open this portion of the meeting and ask for a show of hands of those persons wishing to address the Commission. When recognized, please approach the podium, give your name and city of residence, and state the matter of your interest. If your interest is an Agenda Item, the Chair may suggest that your comments wait until that time. Citizen comments will be limited to four minutes for Citizen Comments and four minutes for Unfinished Business. If you require more than the allotted time, your item will be placed on the next agenda. If you anticipate, in advance, your comments taking longer than the allotted time, you are encouraged to contact the Planning Department ten days in advance of the meeting so that your item may be placed on the next available agenda.*

UNFINISHED BUSINESS – None

NEW BUSINESS – No Action Required

### 2. Presentation and discussion on Transportation Concurrency by Public Works and Community Development Department Staff (Attachment B)

ATTENDANCE VOTE

PUBLIC COMMENT: (Same rules apply as stated in the 1<sup>st</sup> CITIZEN COMMENTS)

COMMENTS AND COMMUNICATIONS OF COMMISSIONERS AND STAFF

ADJOURN

*Any person requiring a disability accommodation should contact the City at least 24 hours in advance.  
For TDD relay service please use the state's toll-free relay service (800) 833-6384 and ask the operator to dial (253) 480-2400*

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**CITY OF COVINGTON  
Planning Commission Minutes**

**January 15, 2014**

**City Hall Council Chambers**

**CALL TO ORDER**

The regular meeting of the Planning Commission was called to order at 6:32 p.m.

**MEMBERS PRESENT**

Jennifer Gilbert-Smith, Ed Holmes, Bill Judd, Jim Langehough, and Alex White

**MEMBERS ABSENT**

Paul Max

**STAFF PRESENT**

Salina Lyons, Principal Planner  
Ann Mueller, Senior Planner  
Kelly Thompson, Planning Commission Secretary

**SPECIAL ORDER OF BUSINESS**

- Election of New Planning Commission Chair

The nominations to elect a new Planning Commission Chair were opened.

- Ø **Commissioner Holmes moved and Commissioner Gilbert-Smith seconded the nomination of Commissioner Judd as the Planning Commission Chair. The motion carried 5-0.**

Chair Judd took over the meeting.

**APPROVAL OF CONSENT AGENDA**

- Ø **1. Commissioner Holmes moved and Commissioner White seconded to approve the December 18, 2014 minutes and consent agenda. Motion carried 5-0.**

**CITIZEN COMMENTS – None**

**PUBLIC HEARING - None**

**UNFINISHED BUSINESS**

**2. Review Revised Draft Comprehensive Plan Chapters – Intro, Land Use, Housing and Economic Development**

Senior Planner Ann Mueller explained that the document that was distributed to the Planning Commission is a work in progress. Staff recently decided that the consultant selected to complete the Comprehensive Plan Update was not the best fit for the city's needs, and we will be working to hire a new consultant. The most recent round of edits has been completed by staff.

Commissioner Holmes liked that the previous consultant was going to list the five most critical needs of the city and the action items associated with each task. He would like to see the new consultant provide a similar action plan with transportation being the highest priority.

It is noted that page 7 and page 8 are duplicate.

Chair Judd added that he would also like to see transportation added and identified as a priority. Ms. Mueller replied that there is a transportation section that has not yet been presented to the Planning Commission.

Chair Judd shared that he would like to see a more streamlined process and greater coordination of efforts between the city and the Covington Water District. He would like to see a partnership in the development process. Principal Planner Salina Lyons explained some of the current challenges with the water district's policies and ensured that staff is working to streamline coordination throughout the permit process.

Ms. Lyons shared that staff has met with Berk & Associates and Stalzer & Associates, who came in second for our RFP selection process for our Comprehensive Plan Update. Over the next couple of weeks, they will analyze the current state of the plan and identify any missing information. There are several elements of the plan that have not yet been touched on in the current draft document.

**NEW BUSINESS - None**

**ATTENDANCE VOTE**

- Ø **Commissioner Gilbert-Smith moved and Commissioner White seconded to excuse Vice-Chair Max. Motion carried 5-0.**

**PUBLIC COMMENT – None**

**COMMENTS AND COMMUNICATIONS FROM STAFF**

The deadline to receive applications for the 2015 Comprehensive Plan Amendment process passed on December 19, 2014 without receiving any applications.

Ms. Lyons asked the Planning Commission for their level of interest in an overview of transportation, traffic concurrency and review of the existing issues and projected growth. If there is interest, this will be added to the agenda for an upcoming Planning Commission meeting. The commissioners concurred.

Commissioner Langehough asked how the replacement of the consultant on the Comprehensive Plan Update affects the timeline for completion. Ms. Lyons Salina shared that the timeline should not change significantly. The city may be ineligible to apply for grants until the Comprehensive Plan Update is complete.

Staff is currently accepting applications to fill the vacant Planning Commission seat.

Temporary sign code updates are postponed until a Supreme Court decision is reached in the Gilbert case which is not expected until June or July 2015.

**ADJOURN**

The January 15, 2015 Planning Commission Meeting adjourned at 7:00p.m.

Respectfully submitted,

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Kelly Thompson, Planning Commission Secretary



City of Covington  
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# Memo

**To:** Planning Commission  
**From:** Salina Lyons, Principal Planner  
Don Vondran, Public Works Director  
**CC:** Richard Hart, Community Development Director  
Ann Mueller, Senior Planner  
Bob Lindskov, City Engineer  
Regan Bolli, City Manager

**Date:** 02/15/2015

**Re:** Traffic Concurrency Overview

## Concurrency

One of the goals of the Washington State Growth Management Act (GMA) is the timely provision of necessary public facilities and service relative to demand, a concept known as concurrency. Concurrency ensures that transportation projects and programs needed to serve future growth are in place either when new development occurs or that a financial commitment is in place to complete the improvements within six years. (RCW 36.70A.070 (6)(b)) This is done to make sure that the city can maintain its adopted levels of service and so that traffic conditions do not degrade with the addition of new residents and workers. Local governments have a significant amount of flexibility regarding how to apply concurrency within their plans, regulations, and permit systems.

Jurisdictions, such as Covington, are required to establish level-of-service standards (LOS) for arterials, transit service, and other facilities. RCW 36.70A.070(6)(a) Once a jurisdiction sets an LOS, it is used to determine whether the impacts of a proposed development can be met through existing capacity and/or to decide what level of additional facilities will be required. Compounding the situation is the fact that for most jurisdictions, control of their level-of-service (LOS) is only partially in their hands. Pass-through traffic and impacts from development in surrounding jurisdictions can dramatically affect the level-of-service. Also, highways of statewide significance are legally exempt from concurrency requirements. The justification for this is reasonable – they are the backbone of the transportation network and therefore logically should not be subject to the myriad of local standards. Nonetheless, the impacts on local jurisdictions from traffic on and off these facilities can have a dramatic effect on a city's adopted LOS.

## Covington's Concurrency

The City of Covington has adopted an LOS D. LOS D is generally defined as traffic that is reaching an unstable flow. Speeds slightly decrease as traffic volumes slightly increase, maneuvering is limited and the driver can feel the slowed speeds. Examples are a busy shopping corridor in the middle of a weekday, or a functional urban highway during commuting hours. It is a common goal for urban streets during peak hours to maintain a LOS D or better but it can be difficult to maintain. Puget Sound Regional Council (PSRC) also defines LOS D as routes that serve the "outer" urban area - those outside the 3-mile buffer - and connect the "main" urban growth area (UGA) to the first set of "satellite" UGA's

(e.g., SR 410 to Enumclaw). These urban and rural areas are generally farther from transit alternatives, have fewer alternative roadway routes, and locally adopted LOS standards in these areas are generally LOS "D" or better. **(Attachment 1)**

In 2012, the city ran a transportation model that identified the current LOS for each intersection in the city. (Attachment 2 *Note: N/A for the roundabouts in the city, since they have a different methodology to determine LOS.*) This test was not updated for tonight's presentation due to the cost associated with the model.

As shown, SE 272<sup>nd</sup> St has many intersections that are failing (Level E) and some that are at a Level D. The corridor between the eastbound SR 18 on/off ramps to 172nd Ave SE were improved in the last 10 years. The portion of the corridor on the west and east side have not been improved and show an LOS E.

### Concurrency Test

Upon incorporation, the city adopted King County's methodology for determining concurrency. To determine if a development passes or fails the link concurrency test, the city has three concurrency standards (aka link standards) that are evaluated for each project as follows:

1. Transportation Adequacy Measure (TAM) value: The average weighted volume-to-capacity (V/C) of arterials and highways serving the city should be 0.89 or less. This is a complex evaluation that uses a detailed traffic forecasting model. The city contracts with David Evans & Associates (DEA) to provide traffic modeling and forecasting services to the city.
2. Unfunded Critical Link Standard: If an unfunded critical link with a V/C of 1.1 or greater exists, then any proposed development which sends at least 50 percent of its peak direction (inbound or outbound) trips to that critical link shall be deemed to fail the concurrency test until the critical link is improved. The rule of 50 percent of peak direction trips is slightly different for residential and commercial developments:
  - 50 percent of the peak direction (inbound) zone traffic from a residential development is used for concurrency testing.
  - 50 percent of the peak direction (inbound or outbound) zone traffic from a commercial development is used for concurrency testing.
3. Arterial Links of Significance Standard: An arterial segment with a V/C greater than 0.8 which has not been designated as an unfunded critical link may be added to the arterial links of significance. Any development shall be deemed to have failed the arterial links of significance standard if the project's anticipated traffic is added to an arterial link of significance with a V/C of 0.9 or greater

*The unfunded critical link test applies within Covington since SE 272nd St/SR 516 (from 104th Ave SE to SR 169) is included in King County's list of links to monitor.*

*Arterial links are not applicable, because the city has not established arterial links of significance.*

In addition, the city evaluates the LOS standard at each intersection. The intersection evaluation is used to determine if mitigation is required at certain intersections, based on the proposed development's impacts.

Intersection LOS standard: All intersections within the city shall be at least LOS D, as previously described. The City's definition of Significant Adverse Impacts (SAI) from a proposed development is as follows:

- The intersection LOS is worse than LOS D, and
- The intersection will carry five or more added vehicles in any one-hour period as a direct impact of the proposed development, and that will be impacted by at least 10 percent of the new traffic generated from the proposed development in that same one-hour period.

### **Inland Group Transportation Concurrency Example**

**Attachment 3** is the model that was run for the new mixed use project in the Town Center. The trips from their development are added to the city's transportation model and are generated based on the standards in the Institute of Transportation Engineers (ITE) Trip Generation Manual (9th edition). The traffic model calculates the increase (or decrease) in the V/C along the corridors and at the intersections. This test provided data that will help to determine if a project will pass or fail concurrency based on how it impacts the system.

The project passes the link standards, but fails to pass the intersection LOS standards. This does not result in a concurrency failure, but is an indicator that mitigation may be necessary as a result of this project. Staff evaluated where and why the failure occurred and determined, during SEPA environmental review, that additional off-site mitigation or payment in-lieu was required. In this example, the mixed-use project caused an intersection deficiency at SE 275<sup>th</sup> St and 180<sup>th</sup> Ave SE, and was required to construct improvements at this intersection to provide safe refuge to help reduce the delay at the stop sign.

Most intersection failures or reduction in LOS along SE 272<sup>nd</sup> St are due to timing and optimization of the signals. The timing of the signal lights are controlled by WSDOT, and any modifications to the signal system would be approved and implemented by them. It is an issue that the public works and community development departments have slated to address; however, it can be an uphill battle. Other delays are simply tolerated due to the design of the street.

### **Questions related to Concurrency**

The following are questions that the city has to answer as we evaluate concurrency in relation to the requirements of GMA, the current situation with the unfunded critical link and the inability to develop east of Jenkins Creek, along with the recent zoning changes to the City's downtown core. A more detailed evaluation of these questions and others will be handled during the concurrency and LOS discussion with the 2015 Comprehensive Plan Update.

### **ARE THERE NEW REQUIREMENTS FOR CALCULATING CONCURRENCY AND LEVEL OF SERVICE?**

Yes, as part of the 2015 Comprehensive Plan Update, cities are required to evaluate concurrency and LOS based on a multi-modal system. However, the lack of specificity in both the statute and its accompanying regulations give "virtually limitless discretion and flexibility" when setting these LOS standards. Concurrency only requires jurisdictions to establish transportation performance levels; it does not dictate what is "too congested." Once jurisdictions set their LOS standards, they must deny

any development that fails under the standards, or apply mitigation to accommodate the impacts from development. All comprehensive plan Transportation Elements are certified by the Puget Sound Regional Council, so there is some accountability for how each city defines concurrency and LOS.

### **SHOULD THE CITY CHANGE OUR LOS & CONCURRENCY REQUIREMENTS EAST OF JENKINS CREEK?**

Currently the method for determining concurrency limits new development east of Jenkins Creek. However, there is significant development opportunity on the east end of the city limits. The only arterial that serves this area is SR 516 (SE 272<sup>nd</sup> St.) which currently experiences delays during peak hours. Meanwhile, development east of the Covington city limits in Maple Valley continues to impact this roadway and is not subject to our concurrency rules since there is not a regional concurrency requirement in GMA.

The city is considering moving away from the King County Standard to implement a more progressive and holistic measurement system in line with the new multi-modal requirements. As part of the city's update we are evaluating the option to identify 10 corridors within the city. Each corridor will be prioritized to create a balance of users both in terms of trips and travel mode (auto, pedestrian, transit, bike, etc.). While some roadways are intended to serve regional travel and vehicle circulation, other facilities provide safe options for a more multimodal user base. If we look at the network as a whole system, we can define LOS and concurrency and assign each corridor an LOS measurement based on modes. **(Attachment 4)**

### **SHOULD THE CITY HAVE A DIFFERENT LEVEL OF SERVICE FOR THE DOWNTOWN?**

As the city moves forward with the review of the Comprehensive Plan and the implementation of the Town Center and Hawk Property subarea plans, the city will need to evaluate the number of people and trips within these higher growth areas. A higher concentration of people and trips creates a situation where the level-of-service begins to decline precisely where a jurisdiction wants to foster growth. This challenge suggests that jurisdictions may want to consider more flexible and tailored concurrency programs.

### **WHAT IF I WANT TO DEVELOP PROPERTY EAST OF JENKINS CREEK TODAY?**

Unless you are Yarrow Bay and have concurrency credits as a result of an agreement with the city associated with impacts from a development in Black Diamond, or if you have a vested Certificate of Transportation Concurrency from many years ago, development is unlikely, at this time.

One of the following three scenarios would need to occur to make concurrency approval possible in the near term:

1. The city has funding for design and acquisition for the portion of the SE 272<sup>nd</sup> St ROW from the Jenkins Creek Bridge to 185<sup>th</sup> Ave SE (unfunded critical link); however, the city has not received funding from the state for construction of this section of SE 272<sup>nd</sup> St. (a designated state highway). Construction costs for this section of highway improvements are estimated at \$12 million dollars. In order for the city to allow development we need to show that this roadway will be fully funded and built within 6 years. Given the construction cost of the roadway and the lack of funding sources available to the city, the city is not confident this will happen within the 6year timeframe. Covington is highly dependent on state and federal money and grants. Until the city consistently receives funds to ensure this roadway can be improved, we will not approve transportation concurrency.

Staff encourages citizens and developers to talk to their state representatives and ask them to pass a transportation package that includes funding for Covington and construction of the needed improvements on SE 272<sup>nd</sup> St. In the meantime, the city is continuously competing with other jurisdictions for various types of funding.

2. The city passed a subarea plan for a site known as the Hawk property. Based on traffic modeling and to ensure transportation concurrency, the developer will be required to build 204<sup>th</sup> Ave SE as a collector from SE 272<sup>nd</sup> St, north to the ramp at SR 18 and SE 256<sup>th</sup> St, prior to moving forward with any onsite development. This road will be designed as a collector arterial and will function as a bypass for traffic through Covington, from SE 272<sup>nd</sup> St to SR 18. Our preliminary modeling shows that this roadway connection **may** lower the traffic volumes at the Jenkins Creek Bridge and allow for the city to grant some additional concurrency for additional development at the east end of the city.

The 204<sup>th</sup> Ave SE expansion is driven and funded by private development so the city does not control the timeline. The developer is forecasting a 2016/2017 construction timeline, but that is very dependent on their access to funds for the project. This roadway is estimated at \$25 million to construct.

3. As previously stated, city staff is evaluating options for how to measure LOS and concurrency through the 2015 Comprehensive Plan Update process and will ask for recommendations and input from the Planning Commission and the public as we move forward. Any changes to the city's methodology for determining LOS and concurrency are required to be outlined in the Comprehensive Plan and certified by PSRC. The Comprehensive Plan will not be adopted until mid-2015. Assuming a new process is adopted, staff will then need to amend the city's municipal code accordingly. Any new regulations would come online in 2016.

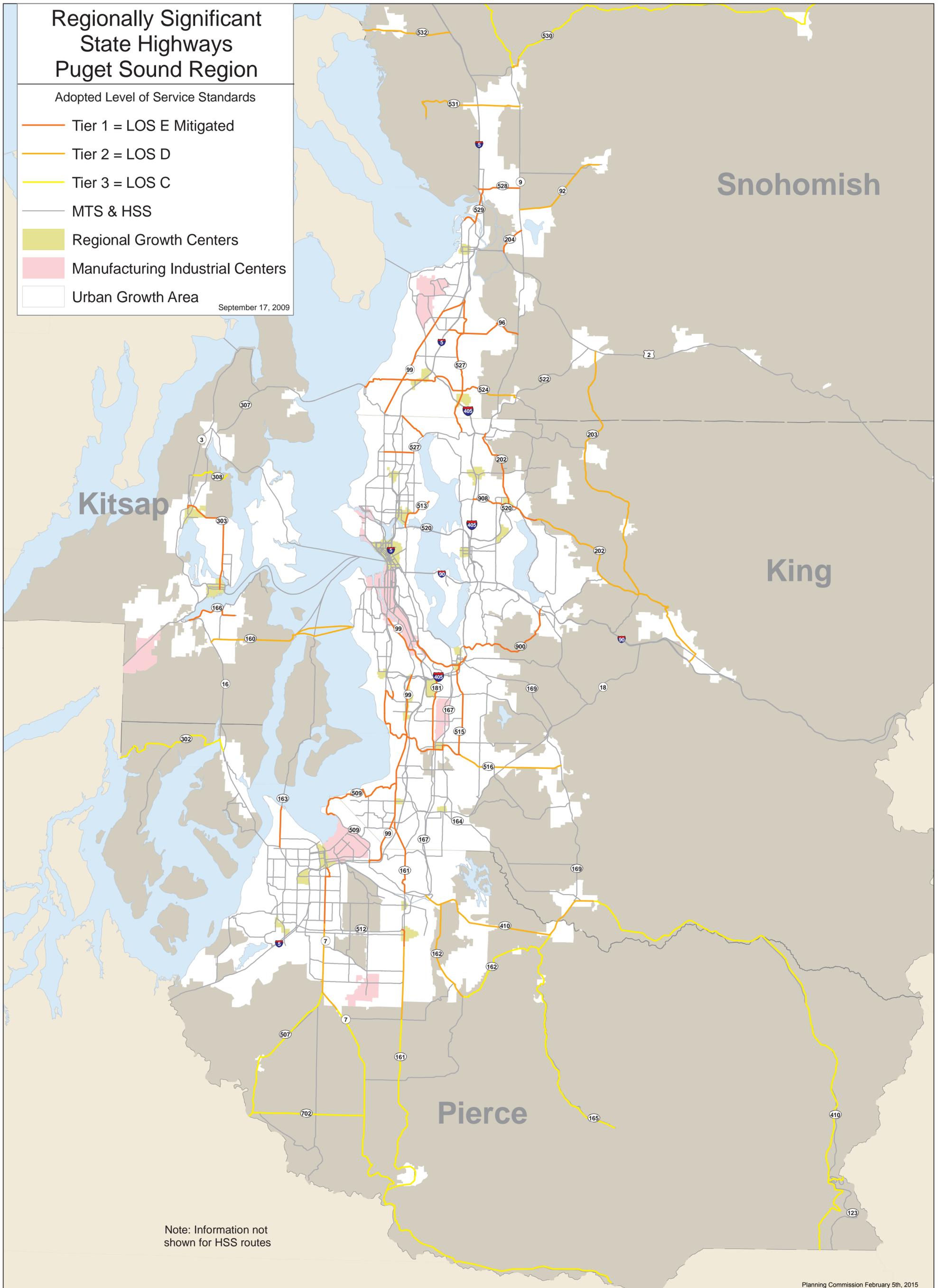
### Attachments

# Regionally Significant State Highways Puget Sound Region

Adopted Level of Service Standards

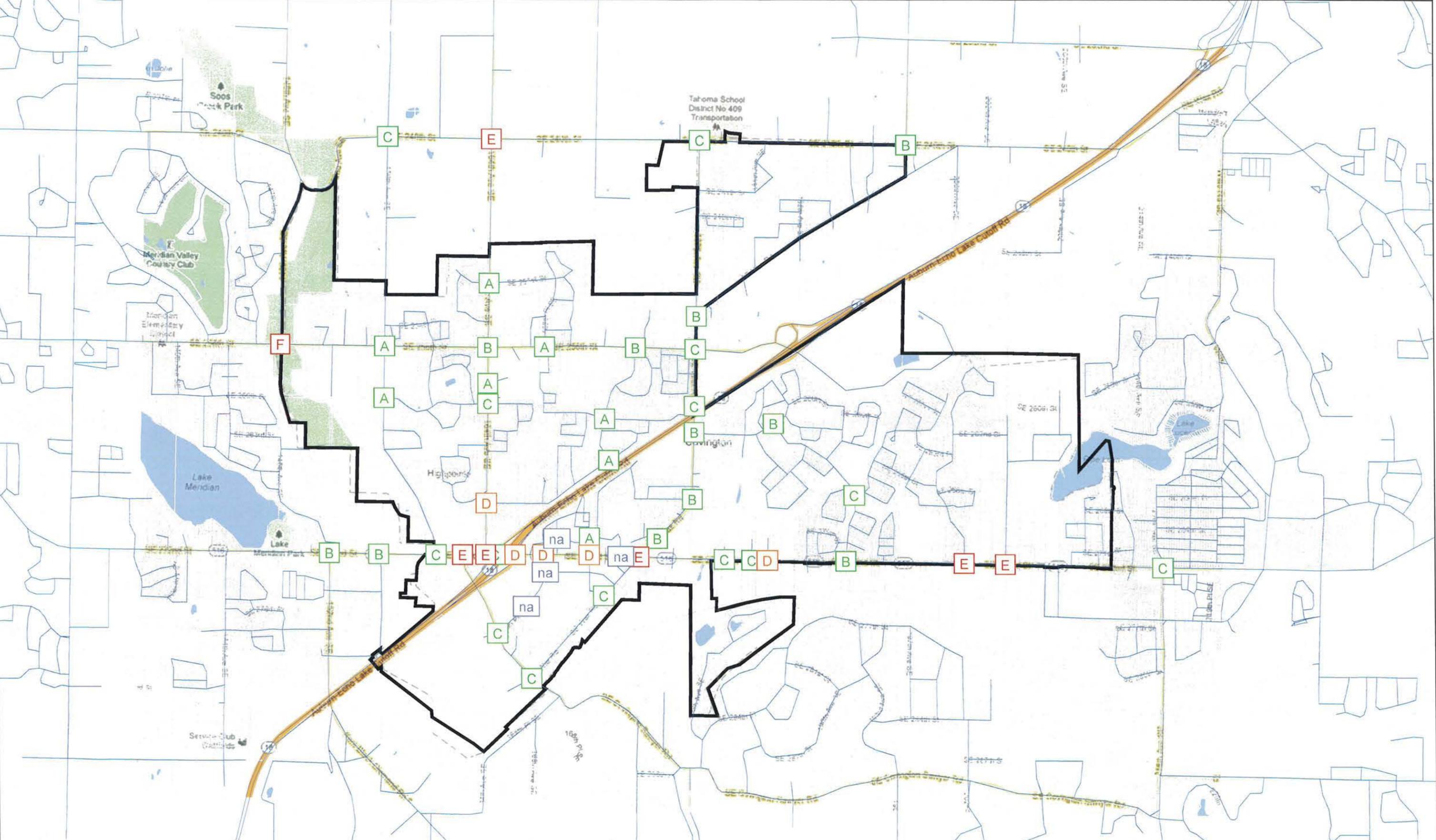
-  Tier 1 = LOS E Mitigated
-  Tier 2 = LOS D
-  Tier 3 = LOS C
-  MTS & HSS
-  Regional Growth Centers
-  Manufacturing Industrial Centers
-  Urban Growth Area

September 17, 2009



Note: Information not shown for HSS routes

# Covington Concurrency Intersection Level of Service (LOS) in 2012 PM Peak Hour



Concurrency Intersection Analysis

Development Case = 2012 PM

LOS Failures = 6

Casefile= 2012 PM.sy7

Forecast Year= 2012 PM

Road System = 2012

Existing 2012 2012 Counts		
Traffic Control <sup>2</sup>	Delay <sup>3</sup>	LOS <sup>4</sup>
Signal	21	C
Signal	27.9	C
Signal	55.3	E
Signal	58.5	E
Signal	28	C
Signal	37.2	D
Signal	41.3	D
Signal	48.3	D
Signal	56.1	E
Signal	29.8	C
Signal	11.6	B
Signal	16.6	B
Signal	13.7	B
Signal	32.5	C
Signal	8.3	A
Signal	0	A
Signal	6.7	A
Signal	9.5	A
RAB	4	0
RAB	0	0
RAB	1	1881
4-Way Stop	10.4	B
4-Way Stop	13.4	B
4-Way Stop	12.7	B
2-Way Stop	23	C
2-Way Stop	17.3	C
2-Way Stop	33.2	D
2-Way Stop	38.2	E
2-Way Stop	37.9	E

CP No.	Intersection	LOS Standard <sup>1</sup>	Traffic Control <sup>2</sup>	Delay <sup>3</sup>	LOS <sup>4</sup>	FAIL?	Site Trips	Int'n Total Vol.
40	Covington-Sawyer Rd & SE Wax Rd	D	Signal	21	C	-	0	1744
59	Covington-Sawyer Rd & 165th Pl SE	D	Signal	27.9	C	-	0	1412
21	Covington-Sawyer Rd & SE 272nd St	D	Signal	55.3	E	FAIL	0	2904
22	SE 272nd St & 164th Ave SE	D	Signal	58.5	E	FAIL	0	2886
23	272nd SB On Ramp/ 272nd SB Off Ramp & SE 272nd St	D	Signal	28	C	-	0	3113
24	272nd NB Off Ramp/ 272nd NB On Ramp & SE 272nd St	D	Signal	37.2	D	-	0	3511
26	168th Pl SE & SE 272nd St	D	Signal	41.3	D	-	0	3296
29	172nd Ave SE & SE 272nd St	D	Signal	48.3	D	-	0	2961
32	SE Wax Rd & SE 272nd St	D	Signal	56.1	E	FAIL	0	2979
57	SE 272nd St & 185th Ave SE	D	Signal	29.8	C	-	0	2307
34	SE 272nd St & 192nd Ave SE	D	Signal	11.6	B	-	0	2081
43	SE Wax Rd & SE 270th Pl	D	Signal	16.6	B	-	0	1415
14	180th Ave SE & SE 262nd Pl	D	Signal	13.7	B	-	0	1665
11	180th Ave SE & SE 256th St	D	Signal	32.5	C	-	0	2080
9	168th Pl SE & SE 256th St	D	Signal	8.3	A	-	0	1098
233	164th Ave SE & Kenwood HS Main Access	D	Signal	0	A	-	0	NA
4	164th Ave SE & SE 251st St	D	Signal	6.7	A	-	0	765
7	156th Ave SE & SE 256th St	D	Signal	9.5	A	-	0	1466
17	180th Ave SE & SE 267th Pl	D	RAB	10.1	B	-	0	1124
44	172nd Ave SE & SE 270th Pl	D	RAB	7.1	A	-	0	858
8	164th Ave SE & SE 256th St	D	RAB	12.4	B	-	0	1935
15	Timberlane Way SE & SE Timberlane Blvd	D	4-Way Stop	10.4	B	-	0	599
5	180th Ave SE & SE Wax Rd	D	4-Way Stop	13.4	B	-	0	914
2	196th Ave SE & SE 240th St	D	4-Way Stop	12.7	B	-	0	810
20	156th Pl SE & SE 272nd St	D	2-Way Stop	23	C	-	0	2632
56	SE 272nd St & Ihop Drwy	D	2-Way Stop	17.3	C	-	0	2130
58	186th Ave SE & SE 272nd St	D	2-Way Stop	33.2	D	-	0	2058
35	SE 272nd St & 201st Ave SE	D	2-Way Stop	38.2	E	FAIL	0	1798
36	SE 272nd St & 204th Ave SE	D	2-Way Stop	37.9	E	FAIL	0	1736

# Agenda Item 2 Attachment 2

4-Way Stop	20.6	C	19	192nd Ave SE/Timberlane Way SE & SE 267th St	D	4-Way Stop	10.7	B	-	0	645
2-Way Stop	16.2	C	39	SE Wax Rd & SE 275th St	D	2-Way Stop	16.2	C	-	0	868
2-Way Stop	17	C	13	180th Ave SE & SE 261st St	D	2-Way Stop	17	C	-	0	1433
2-Way Stop	22.6	C	1	180th Ave SE & SE 240th St	D	2-Way Stop	22.6	C	-	0	929
2-Way Stop	14.6	B	10	175th Way SE & SE 256th St	D	2-Way Stop	14.6	B	-	0	1046
2-Way Stop	9.8	A	53	172nd Ave SE & SE 261st St	D	2-Way Stop	9.8	A	-	0	117
2-Way Stop	8.6	A	16	SE 267th St & 172nd Ave SE	D	2-Way Stop	8.6	A	-	0	82
2-Way Stop	27.3	D	18	164th Ave SE & SE 268th St	D	2-Way Stop	27.3	D	-	0	1006
2-Way Stop	15.1	C	52	164th Ave SE & SE 260th St	D	2-Way Stop	15.1	C	-	0	867
2-Way Stop	9.6	A	12	156th Ave SE & SE 260th St	D	2-Way Stop	9.6	A	-	0	269
2-Way Stop	169.3	F	6	SE 256th St & 148th Ave SE	D	2-Way Stop	169.3	F	FAIL	0	1387
Signal	12.8	B	54	152nd Ave SE/152nd Way SE & SE 272nd St	D	Signal	12.8	B	-	0	3057
2-Way Stop	11.9	B	55	156th Ave SE & SE 272nd St	D	2-Way Stop	11.9	B	-	0	2522
Signal	24.6	C	37	216th Ave SE & SE 272nd St	D	Signal	24.6	C	-	0	1860
2-Way Stop	24.3	C	50	156th Ave SE & SE 240th St	D	2-Way Stop	24.3	C	-	0	811
4-Way Stop	39.7	E	51	164th Ave SE & SE 240th St	D	4-Way Stop	39.7	E	FAIL	0	1112
4-Way Stop	0.98	7	3	SE Wax Rd & SE 240th St	D	4-Way Stop	0.98	7	FAIL	0	619

1 - LOS standards are based upon the functional classifications of the intersecting roadways.

2 - Intersection Traffic Controls: 4-Way Stop= All Way Stop, 2-Way Stop= Two Way Stop, RAB = Roundabout

3 - Delay is measured in seconds per vehicle. At Signal, All Way Stop, and RAB intersections, it represents average delay for all movements in the intersection. For Two Way Stop Control intersections, it represents average delay for the minor leg movements (only).

4 - LOS is the level-of-service based on the methodology outlined in the Highway Capacity Manual (HCM 2000).

5 - Roundabout LOS is calculated using aaSIDRA Program.



Figure 3. PM Peak Hour Site Trip Distribution Citywide

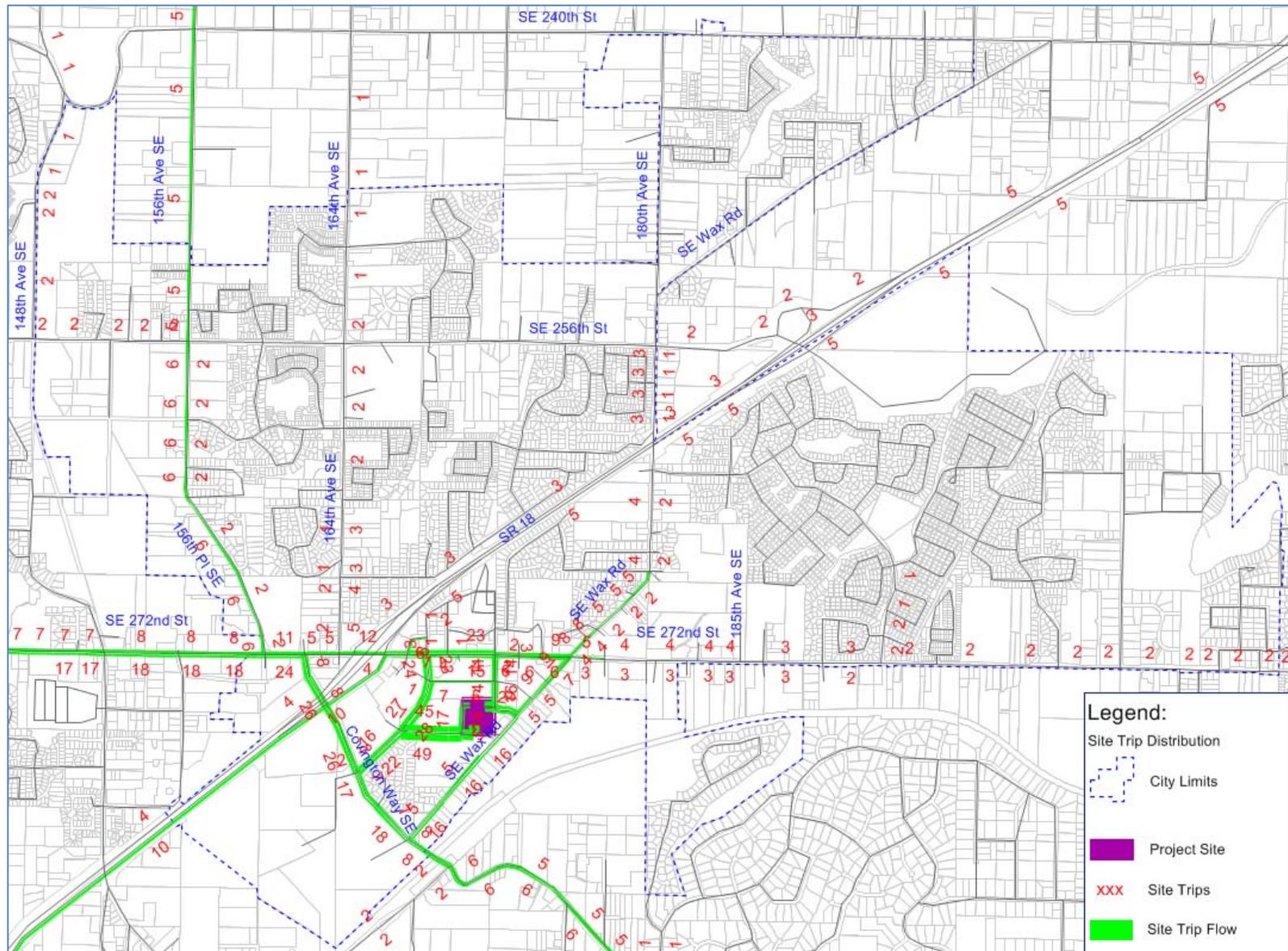


Figure 4. PM Peak Hour Site Trip Distribution Around Project Site



**TAM Value: Pass**

Zone TAM Threshold	Site TAM Score
Maximum 0.89	<b>Pass;</b> because the site TAM score of 0.63 serving concurrency zone 91 is less than the zone TAM threshold of 0.89.

**Unfunded Critical Link Standard: Pass**

Unfunded Critical Links (V/C ≥ 1.1) Criteria	Test Results
Fail if 50% of peak direction trips (inbound for a residential development; inbound or outbound for a commercial development) are present on the unfunded critical links.	<b>Pass;</b> because there is a maximum of 3 trips, which is less than 50% (or 44) trips of the peak direction trips (maximum direction or inbound for this project due to mixed-use) present on the unfunded critical links with a V/C ≥ 1.1 (SE 272nd Street east of 177th Avenue SE).

**Arterial Links of Significance Standard: Not Applicable**

Arterial Links of Significance (V/C ≥ 0.9) Criteria	Test Results
Fail if any site trips are added to the arterial links of significance.	<b>Not applicable;</b> because no arterial links of significance are established by the City.

**5.4 Citywide Intersection Concurrency Analysis**

Intersection LOS was evaluated using the citywide SYNCHRO model for sign-controlled and signalized intersections. Roundabout LOS was evaluated using the aaSidra program. The signal timings and phasing are assumed to remain unchanged from existing conditions for signalized intersections until the City or other agencies implement a change. The existing roadway network was generally applied to the pipeline “with project” condition. The PM peak hour factor and heavy vehicle percentage obtained from the existing 2012 condition were applied to the pipeline concurrency condition. The intersection LOS standard is examined as follows:

**Intersection LOS Standard: Not Met Intersection LOS Standard**

Intersection LOS Standard	Test Results
LOS D or better	Ten intersections have an LOS worse than LOS D.
Significant Adverse Impacts (SAI) - LOS worse than LOS D, and both five site trips and 10% of the site trips (or 16 site trips) are present.	There are five SAI intersections.

The citywide intersection evaluation results show that there are ten intersections that fail to meet the City’s LOS standard of LOS D. Most of these intersections also operate at LOS E or worse in the pipeline baseline condition. Based on the City’s intersection LOS standard, significant adverse impacts occur at five of the deficient intersections. Overall, the proposed project fails to pass the City’s intersection LOS standard.

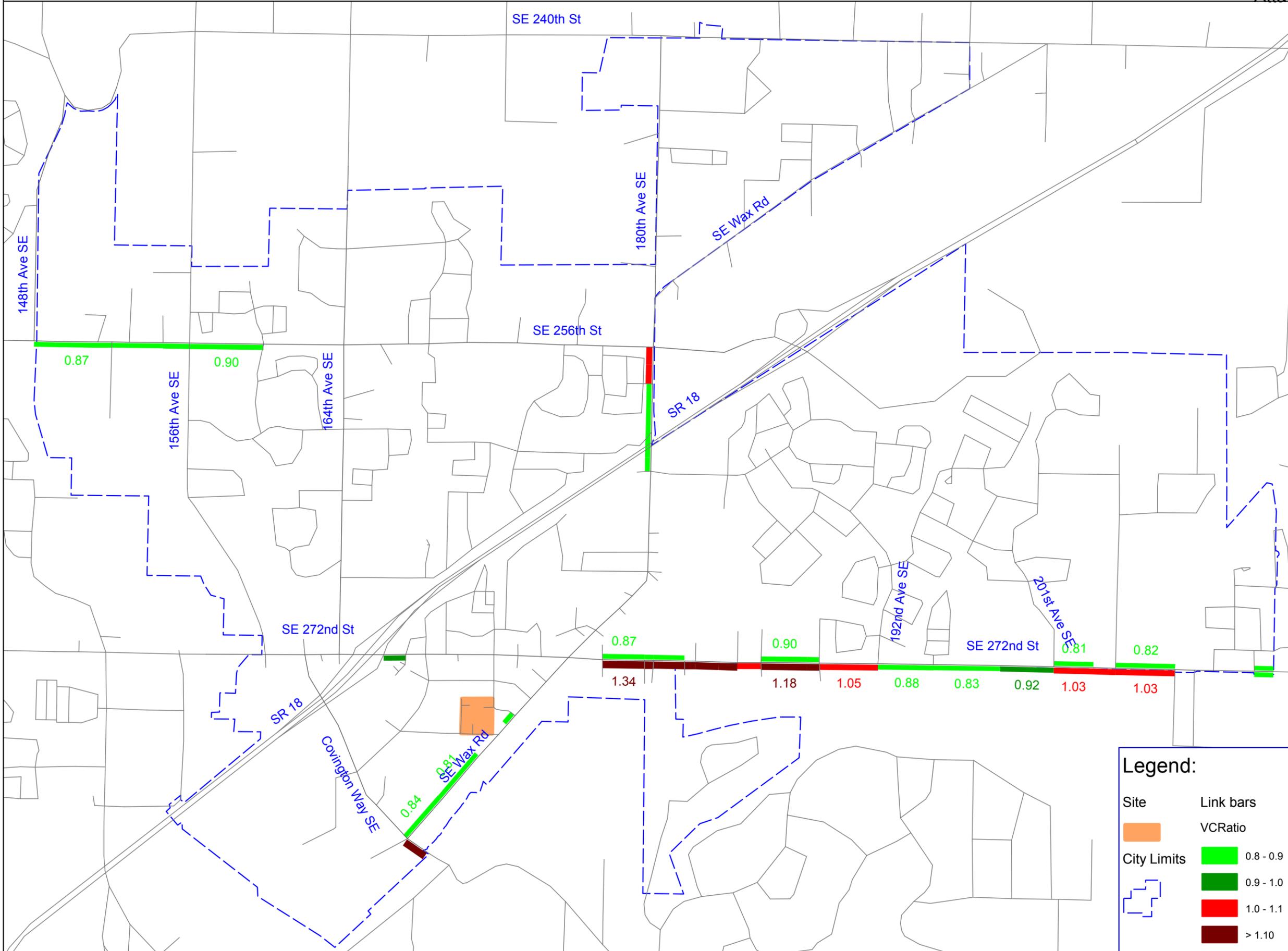
**Table 2** shows the deficient intersections’ LOS and delay for the pipeline “with project” condition. The citywide concurrency intersection LOS table and map is shown in **Appendix B**.

**Table 2. Citywide Intersection LOS Deficiencies**

No.	Intersection	LOS Standard	Traffic Control	Pipeline with Project		Site Trips	SAI*	Mitigation
				LOS	Delay			
59	165th Pl SE/Covington Way SE	D	Signal	E	68.0	49	Yes	Timings and phasing re-optimized
21	SE 272nd St/ Covington Way SE	D	Signal	E	71.4	38	Yes	An additional NB left-turn pocket will resolve the LOS deficiencies
32	SE 272nd St/ SE Wax Rd	D	Signal	E	68.0	26	Yes	Timing & phasing re-optimized
20	SE 272nd St/ 156th Pl SE	D	Two-Way Stop	E	45.0	34	Yes	Tolerate due to relatively small side street volumes; monitor
58	SE 272nd St/ 186th Ave SE	D	Two-Way Stop	F	128.7	6	No	No significant adverse impact and very small side street volumes; monitor
35	SE 272nd St/ 201st Ave SE	D	Two-Way Stop	E	37.9	3	No	No significant adverse impact and very small side street volumes; monitor
36	SE 272nd St/ 204th Ave SE	D	Two-Way Stop	E	39.8	3	No	No significant adverse impact and very small side street volumes; monitor
39	SE 275th St/SE Wax Rd	D	Two-Way Stop	F	197.5	35	Yes	A median refuge lane on the north leg on SE Wax Rd will resolve the LOS deficiencies.
18	SE 268th St/ 164th Ave SE	D	Two-Way Stop	F	53.4	5	No	No significant adverse impact; tolerate due to relatively small side street volumes; monitor
6	SE 256th St/ 148th Ave SE	D	Two-Way Stop	F	148.2	2	No	No significant adverse impact; tolerate due to relatively small side street volumes; monitor

\*SAI - Significant Adverse Impact criteria: LOS worse than LOS D, and both 5 site trips and 10% of the site trips (or 16 trips) are present.

Covington Concurrency Road Segments V/C Greater 0.8\_ Pipeline + Inland Group 2019 PM



**Legend:**

Site	Link bars
	VCRatio
	0.8 - 0.9
	0.9 - 1.0
	1.0 - 1.1
	> 1.10

## Concurrency Intersection Analysis

City of Covington, Washington

Development Case = 2019 Baseline+Inland Group PM

Casefile= 2019 Baseline+Inland Group PM.sy7

Forecast Year= 2019 Baseline+Inland Group PM

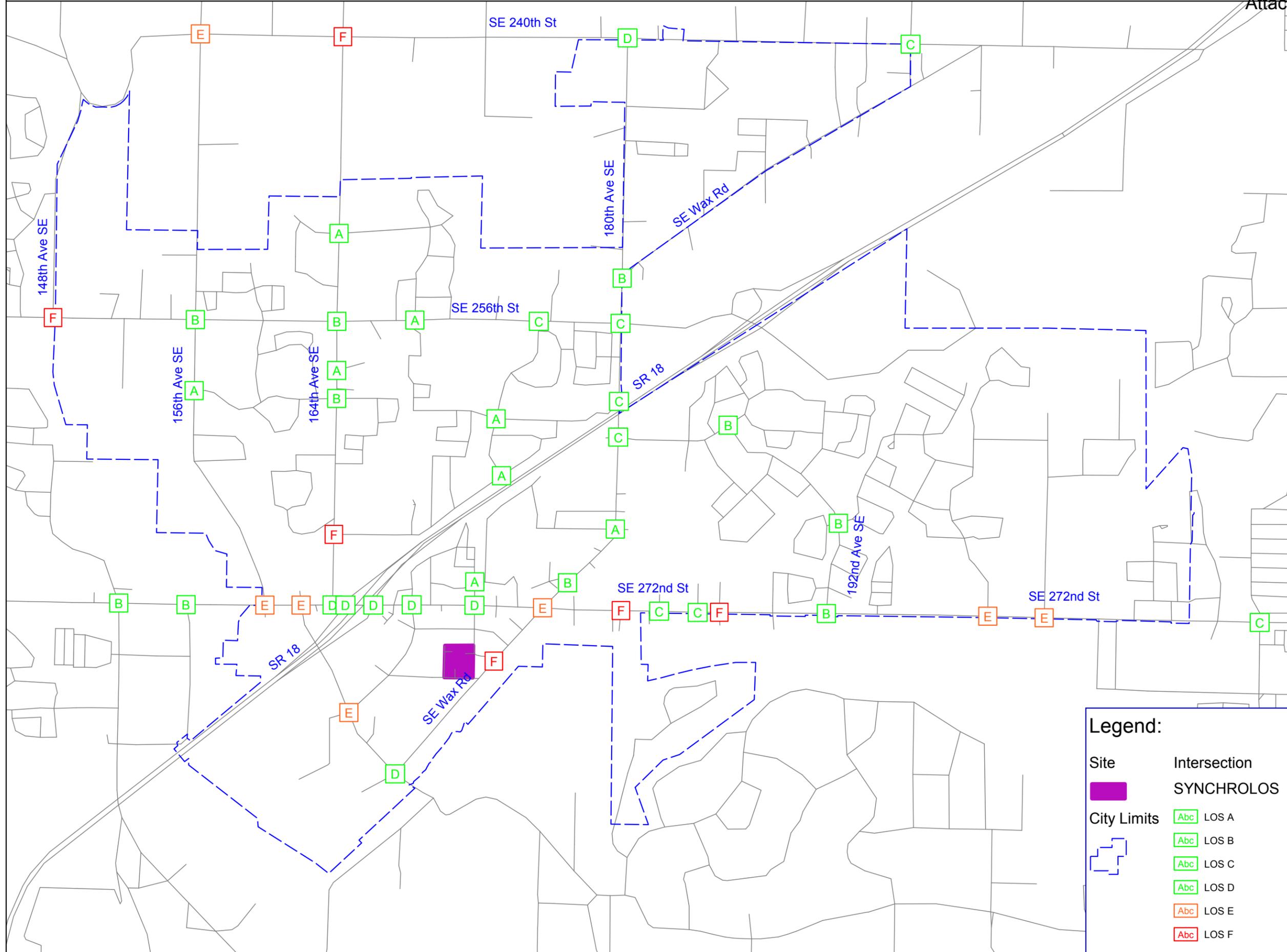
Road System = 2012

<b>LOS Failures = 10</b>
<b>Total Intersection Delay = 570 Hours</b>

### Pipeline Baseline 2017

Traffic Control <sup>2</sup>	Delay <sup>3</sup>	LOS <sup>4</sup>	CP No.	Intersection	LOS Standard <sup>1</sup>	Traffic Control <sup>2</sup>	Delay <sup>3</sup>	LOS <sup>4</sup>	LOS Pass or Fail	Site Trips	Int'n Total Vol.
Signal	24.7	C	40	Covington-Sawyer Rd & SE Wax Rd	D	Signal	37.1	D	-	30	2078
Signal	47.4	D	59	165th PI SE & Covington Way	D	Signal	68.0	E	FAIL	49	2070
Signal	68.1	E	21	SE 272nd St & Covington Way	D	Signal	71.4	E	FAIL	38	3491
Signal	288.9	F	22	SE 272nd St & 164th Ave SE	D	Signal	36.0	D	-	13	3262
Signal	35.6	D	23	SE 272nd St & 272nd SB Off Ramp	D	Signal	38.5	D	-	17	3531
Signal	41.4	D	24	SE 272nd St & 272nd NB On Ramp	D	Signal	43.4	D	-	31	3769
Signal	48.8	D	26	SE 272nd St & 168th PI SE	D	Signal	48.6	D	-	63	3700
Signal	44.3	D	29	SE 272nd St & 172nd Ave SE	D	Signal	52.6	D	-	40	3292
Signal	60.9	E	32	SE 272nd St & SE Wax Rd	D	Signal	68.0	E	FAIL	26	3534
Signal	27.4	C	57	SE 272nd St & 185th Ave SE	D	Signal	25.7	C	-	7	2348
Signal	21.8	C	34	SE 272nd St & 192nd Ave SE	D	Signal	16.4	B	-	6	2230
Signal	18.6	B	43	SE Wax Rd & SE 270th PI	D	Signal	17.1	B	-	10	1570
Signal	17.3	B	14	SE 262nd PI & 180th Ave SE	D	Signal	22.6	C	-	5	1805
Signal	34.1	C	11	SE 256th St & 180th Ave SE	D	Signal	33.6	C	-	4	2198
Signal	4.9	A	9	SE 256th St & 168th PI SE	D	Signal	6.6	A	-	0	1152
Signal	7.0	A	233	Kenwood HS Main Access & 164th Ave SE	D	Signal	7.3	A	-	3	1070
Signal	6.8	A	4	SE 251st St & 164th Ave SE	D	Signal	6.8	A	-	1	915
Signal	13.1	B	7	SE 256th St & 156th Ave SE	D	Signal	13.0	B	-	7	1548
RAB	6.9	A	17	SE 267th PI & 180th Ave SE	D	RAB	6.6	A	-	6	1221
RAB	8.4	A	44	SE 270th PI & 172nd Ave SE	D	RAB	7.0	A	-	1	924
RAB	12.0	B	8	SE 256th St & 164th Ave SE	D	RAB	13.4	B	-	3	2172
4-Way Stop	10.1	B	15	SE Timberlane Blvd & Timberlane Way SE	D	4-Way Stop	10.6	B	-	0	633
4-Way Stop	14.9	B	5	SE Wax Rd & 180th Ave SE	D	4-Way Stop	14.8	B	-	2	974
4-Way Stop	15.3	C	2	SE 240th St & 196th Ave SE	D	4-Way Stop	17.2	C	-	0	970
2-Way Stop	44.4	E	20	SE 272nd St & 156th PI SE	D	2-Way Stop	45.0	E	FAIL	34	2943
2-Way Stop	20.8	C	56	SE 272nd St & Ihop Drwy	D	2-Way Stop	18.6	C	-	7	2330
2-Way Stop	64.7	F	58	SE 272nd St & 186th Ave SE	D	2-Way Stop	128.7	F	FAIL	6	2268
2-Way Stop	37.3	E	35	SE 272nd St & 201st Ave SE	D	2-Way Stop	37.9	E	FAIL	3	1775
2-Way Stop	35.3	E	36	SE 272nd St & 204th Ave SE	D	2-Way Stop	39.8	E	FAIL	3	1739





**Legend:**

<b>Site</b>	<b>Intersection</b>
	<b>SYNCHROLOS</b>
<b>City Limits</b>	 LOS A
	 LOS B
	 LOS C
	 LOS D
	 LOS E
	 LOS F

## Appendix C – Concurrency Test Summary

### Applicant Data:

Applicant: Jim Wene  
 Site: TBD - SW corner of 172nd Ave SE and future SE 274th  
 Proposed Development: Affinity/Polaris at Covington (Inland Group)

### Trip Generation Data:

ITE Land Use Code: LUC 223/Mid-Rise Apartment (Moderate-Income Apartments)  
LUC 251/Senior Adult Housing-Detached (Senior Apartments)  
LUC 710/General Office (Office Buildings)  
LUC 826/Specialty Retail Center (Commercial Retail)

Gross Trips Total: 159 Trips (88 inbound, 71 outbound)  
 Discount Trips: 0 Trips (0 inbound, 0 outbound)  
 Net Trips Total: 159 Trips (88 inbound, 71 outbound)  
 50% of Site Trips in Peak Direction: 44 Trips

### Link Concurrency Test Results:

TAM Value:	<input checked="" type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> Not Applicable
Unfunded Critical Link Standard:	<input checked="" type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input type="checkbox"/> Not Applicable
Arterial Links of Significance Standard:	<input type="checkbox"/> Pass	<input type="checkbox"/> Fail	<input checked="" type="checkbox"/> Not Applicable

### Intersection Concurrency Test:

Intersection LOS Standard (LOS D):	<input type="checkbox"/> Pass	<input checked="" type="checkbox"/> Fail	<input type="checkbox"/> Not Applicable
SAI Criteria:	<input type="checkbox"/> Pass	<input checked="" type="checkbox"/> Fail	<input type="checkbox"/> Not Applicable

### Impact Fee Calculation:

Calculated Impact Fees:	<u>\$814,018</u>	
Impact Fee Adjustments:	<u>0</u>	<u>-\$535,200 (subject to approval)</u>
<b>Total Impact Fees:</b>	<b><u>\$814,018</u></b>	<b><u>\$278,818 (subject to approval)</u></b>

