



City of Covington

Unmatched Quality of Life.

City of Covington

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The City of Covington is a place where community, business, and civic leaders work together with citizens to preserve and foster a strong sense of community.

PLANNING COMMISSION AGENDA

July 19, 2012

6:30 PM

CALL TO ORDER

ROLL CALL

Chair Daniel Key, Vice Chair Paul Max, Sonia Foss, Ed Holmes, Bill Judd, Sean Smith, & Alex White.

PLEDGE OF ALLEGIANCE

APPROVAL OF CONSENT AGENDA

1. Planning Commission Minutes for June 7, 2012.

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.*

**PUBLIC HEARING – 2012 Comprehensive Plan & Development Regulation Amendment Docket-
(POSSIBLE ACTION & FINAL RECOMMENDATION TO COUNCIL)**

Public hearing, discussion, possible decision and recommendation to Council on the following three docketed items:

- a.) CPA 2012-01: Planning Commission initiated amendment to DTP Policy 2.4 in Chapter 4, the Downtown Element, of the Comprehensive Plan, requiring ground floor retail, restaurant, and/or personal service uses as part of any new multi-story, multi-family residential or mixed-use developments in the Town Center (TC) Zone;*
- b.) DRA 2012-01: Planning Commission initiated amendments to the City's Zoning Code & Development Regulations, Chapter 18.31, implementing the policy language in CPA 2012-01 above, to require any multifamily development in the Town Center (TC) zone to be located in a minimum three-story mixed use structure with 60% or more of the ground floor abutting a street, public space, plaza or greenspace to be occupied by one or more of the following permitted uses: retail, restaurant, and/or personal service uses.*
- c.) CPA 2012-02: City Staff initiated amendment to Chapter 1, the Introduction Chapter, and new Appendix T-3 in the Comprehensive Plan relating to criteria for annexing unincorporated areas. Also included are changes and additions to the existing annexation policies in Chapter 2, the Land Use Element, and Section 2.8.2 Urban Growth Area and Potential Annexation Areas to guide future annexations.*

UNFINISHED BUSINESS – None

NEW BUSINESS - NONE

ATTENDANCE VOTE

PUBLIC COMMENT: (Same rules apply as stated in the 1st 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) 638-1110*
Web Page: www.covingtonwa.gov

**CITY OF COVINGTON
Planning Commission Minutes**

June 7, 2012

City Hall Council Chambers

CALL TO ORDER

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

MEMBERS PRESENT

Chair Daniel Key, Vice Chair Paul Max, Sonia Foss, Ed Holmes, Bill Judd and Alex White.

MEMBERS ABSENT

Sean Smith

STAFF PRESENT

Richard Hart, Community Development Director
Salina Lyons, Senior Planner
Kelly Thompson, Planning Commission Secretary

APPROVAL OF CONSENT AGENDA

- Ø **1. Vice Chair Max moved and Commissioner White seconded to approve the consent agenda and the minutes for May 3, 2012. Motion carried 6-0.**

CITIZEN COMMENTS – NONE

PUBLIC HEARING - NONE

NEW BUSINESS - NONE

UNFINISHED BUSINESS

Community Development Director, Richard Hart introduced a memo outlining the two Comprehensive Plan Amendments and one Development Regulation Amendment Docket. Staff wanted to make sure the Planning Commission had the opportunity to discuss any comments made at the public hearing from April 5, 2012.

Chair Key opened the discussion to questions and feedback from the Commissioners.

Mr. Hart provided some background on the process of developing the Downtown Plan in 2009 for the benefit of Planning Commissioners who have not served during the entire process. There was a six month public participation process that included mailings, outreach and public forums. After public input, 4 conceptual options were presented by the City's consultant. The option selected from final report was what the consultant recommended and staff and the majority of the public wanted.

Mr. Hart gave the Planning Commission some history regarding big box retail in the downtown area. Ashton Development requested that the zoning district regulations be amended to remove the requirement of mandatory mixed-use developments with ground floor retail in the Town Center zone. The City Council amended zoning district regulations from what had been recommended in the plan and big box retail was limited to the western portion of the downtown zone. The property was later sold to Valley Medical which is currently being developed as an Urgent Care facility.

Commissioner Holmes asked about the verbiage of single use vs. multi-use and observed that the time period of "interim" is undefined.

Mr. Hart explained that the intent of the City Council was to wait a few years and reevaluate the zoning regulations before revisiting the vision.

Commissioner Holmes shared his concern that the recent testimony was negative regarding the multi-use and asked why the testimony was in such conflict with the zoning regulations.

Mr. Hart responded that the property owner stands to maximize profits on the land when there are less restrictions placed on the property. That is one view point from an individual who wants to maximize the use and the value of that property. There are other large property owners in the downtown who have not expressed strong opposition to the mixed use requirement.

Mr. Hart noted several other successful examples of mixed-use buildings in Mercer Island, Kirkland, Mill Creek, Auburn and Renton (the Landing). There is no denying there have been difficulties with new mixed-use developments given the economic downturn. Mountlake Terrace just built a new transit center and approved a ground floor retail/residential mixed-use building with underground parking which also utilized the multifamily tax exemptions. Several of the cities who have had success are near a major interstate. There is a greater long term tax and economic benefits of a mixed-use development.

If the City can incentivize multi-story mixed-use development with ground floor retail, development could occur more quickly and more successfully if it is a

public-private partnership. There are a number of things the public can come to the table with, for example: infrastructure improvements, land, parking, etc. The City does not currently have the funds to do this, but we are working on ways to raise these types of funds to implement this long-term vision in the town center, even with its limitations.

Commissioner White pointed out that the plan is a long-term vision, and if it doesn't occur right now, it will happen eventually.

Commissioner Foss doesn't like to see development turned away right now, but realizes that to achieve the long-term vision, it may not happen right away.

Commissioner Judd stated that he trusts in the work that went into the process of developing the downtown vision and zoning standards. A bit of short-term sacrifice is worth achieving the long-term vision. One of the complaints he has heard from the public is that the City has been inconsistent, and rules have changed many times over the years. This is an exercise in consistency. We don't want to panic that development isn't occurring as quickly as we want it to. It takes more vision and leadership to stay with the plan.

Chair Key stated that he doesn't hear people clamoring for another apartment building. He hears that the public wants more retail options and a town center plaza.

Related to the Comprehensive Plan criteria for annexing unincorporated areas, Mr. Hart has been in contact with King County's Planning Department. Staff prepared a SEPA application for the non-project action. The County called and asked some questions. Mr. Hart explained that we would appreciate and requested King County's review of the annexation policies prior to the July public hearing.

ATTENDANCE VOTE

- Ø **Commissioner Foss moved and Commissioner White seconded to excuse Commissioner Smith. Carried 6-0.**

PUBLIC COMMENT- NONE

COMMENTS AND COMMUNICATIONS FROM STAFF

Ms. Lyons shared that a six lot subdivision, Woodbridge, was issued the Notice to Proceed a couple of weeks ago. Staff anticipates Covington Professional Arts medical building will be submitting for building permits in the near future.

Chair Key asked about the status of Soos Creek Business Park. Ms. Lyons explained that the site development application is due to expire but they can apply for a two year extension. This site is 100% dependent on the new lift station for sewer service.

Ms. Lyons also talked about the future alignment of the street regarding the Covington Professional Arts Building.

There is recently passed legislation for approving extensions of plats for up to 7 years. Plats are now approved for 7 years from the vested date. Projects vested prior to 2007 will receive 9 years.

Mr. Hart shared that Community Development gave a presentation to Budget Priorities Advisory Committee (BPAC) in June. He will share the PowerPoint presentation via e-mail with the Planning Commission. Mr. Hart shared some statistics on Business Licenses and Home Occupations and noted that analysis of potential park impact fees are being presented to the City Council. The recent open house for the Northern Gateway study was well attended.

ADJOURN

The June 7, 2012 Planning Commission Meeting adjourned at 8:17 p.m.

Respectfully submitted,

Kelly Thompson, Planning Commission Secretary

Memo

To: Planning Commission Members

From: Richard Hart, Community Development Director
Ann Mueller, Senior Planner

Date: July 19, 2012

Re: **Public Hearing on 2012 Docketed Comprehensive Plan Amendments and Development Regulation Amendment.**

The Planning Commission has held several meetings discussing the proposed 2012 Docket for two Comprehensive Plan Amendments and one related Development Regulation Amendment. Tonight, July 19, the formal public hearing is scheduled and has been duly noticed, as required by law, in the Covington Reporter, posted on the city's website and at city hall. In addition, staff mailed the public notice of this hearing to Doug Mergenthaler, Don Ramsey and Jim Wene with Ashton Development Company, Evan J. Hunden with DevCo. Inc, Josh Parnell with First Western Properties, Inc., Eric Cederstrand with Commencement Bay Development and Kim Nakamura with Rush Forth Construction Company, since they spoke at a prior Planning Commission meeting and/or submitted written comments on the amendments related to requiring mixed-use development in the Town Center focus area when multifamily development is proposed.

A SEPA determination of Non-significance was issued on May 25, 2012, and a 60-day notice of the proposed change to the city's Comprehensive Plan and Zoning Code was sent to the Washington State Department of Commerce on May 30, 2012 as required by GMA.

Comments on these proposed amendments were requested and received from King County staff, Paul Reitenbach. Mr. Reitenbach's comments focused on goals and policies in the Land Use Element of the Comprehensive Plan related to the urban growth area and potential annexation areas (i.e. policies LNP 2.1, 2.3, 2.4). Changes to these specific policies were not part of staff's original proposal but after discussion we have incorporated some of King County's recommended changes to the language.

Tonight, after listening to any public comment and testimony, the Commission may discuss the proposed amendments and then make a recommendation to the City Council on the draft amendments or direct staff to make further modifications and bring those back at a future meeting. The City Council is currently scheduled to hear the Planning Commission's recommendation on August, 14, 2012. So action, by the Planning Commission on the 2012

Docket is necessary at tonight's meeting, unless the Commission finds a specific need to delay action on their recommendation to the Council.

There are two comprehensive plan amendments and one associated development regulation amendment under consideration. The 2012 Docketed items are as follows:

1. CPA 2012-01: Amendment to DTP Policy 2.4 in chapter 4, the Downtown Element of the Comprehensive Plan, to require ground floor retail, restaurant, and/or personal service uses as part of any new multi-story, multifamily residential development in the Town Center focus area zone. (Attachment 1)
2. DRA 2012-01: Amendment to the City's Zoning Code and Development Regulations, CMC 18.31, to implement the policy language in CPA 2012-01. This amendment will require any multifamily development in the Town Center focus area zone to be located in a minimum three-story mixed use structure with 60% or more of the ground floor abutting a street, public space, plaza or green space to be occupied by one or more of the following permitted uses: retail, restaurant, and/or personal service uses. (Attachment 2)
3. CPA 2012-02: Amendment to Chapter 1, the Introduction Chapter of the Comprehensive Plan and the addition of a new Appendix T-3, relating to criteria for annexing unincorporated areas. Chapter 2, the Land Use Element, Section 2.8.2 Urban Growth Area and Potential Annexation Areas is also amended with new or modified policies to guide future annexations. (Attachment 3)

Decision Criteria for Review of Comprehensive Plan & Development Regulation Amendments

Following is the criteria (in italics) that the Planning Commission must use to determine if they will recommend the proposed comprehensive plan and code amendments to the City Council for their final review and decision.

Comprehensive Plan Amendment Review Criteria (CMC 14.25.060)

(1) Proposed amendments that meet one of the following criteria may be included in the final docket:

(a) If the proposed amendment is site specific, the subject property is suitable for development in general conformance with adjacent land use and the surrounding development pattern, and with zoning standards under the potential zoning classifications.

Staff Findings: N/A. The proposed amendments are not site-specific.

(b) State law requires or a decision of a court or administrative agency has directed such a change.

Staff Findings: N/A. The proposed amendments are not required by law or a decision of the court.

(c) There exists an obvious technical error in the pertinent comprehensive plan provision.

Staff Findings: N/A. The proposed amendments are not the result of a technical error.

(2) Proposed amendments that do not meet one of the criteria in subsection (1) of this section shall meet all of the following criteria:

(a) The amendment represents a matter appropriately addressed through the comprehensive plan, and the proposed amendment demonstrates a public benefit and enhances the public health, safety and welfare of the City.

Staff Findings:

CPA2012-01-This amendment will direct multifamily development into mixed-use, multi-story structures in the Town Center Focus Area in the Downtown zone to ensure that future residential development is part of a diverse and vibrant mixed-use town center with a pedestrian scale and active streetscape in the heart of Covington's downtown which will fulfill the vision for the Town Center Focus Area.

CPA2012-02- These amendments will ensure that there are well thought-out criteria and polices to assist the City Council in their analysis of future requests by property owners to annex into the City of Covington.

(b) The amendment is in compliance with the three-year limitation rules as specified in CMC 14.25.040(3).

Staff Findings:

CPA2012-01- The Downtown Element of the Comprehensive Plan was amended in 2009. This amendment is being proposed three years later as part of the 2012 amendment cycle.

CPA2012-02- There have been no similar amendments proposed in the last three years related annexations.

(c) The amendment does not raise policy or land use issues that are more appropriately addressed by an ongoing work program approved by the City Council.

Staff Findings:

CPA2012-01-No, this amendment was requested by the Planning Commission to ensure that any future multifamily development in the Town Center focus area is part of a mixed-use, multi-story structure with ground floor retail, restaurant and/or personal service uses.

CPA2012-02- No, these amendments identify and include text, policies and criteria that guide how the City Council evaluates requests for annexation.

(d) The proposed amendment addresses significantly changed conditions since the last time the pertinent comprehensive plan map or text was amended. "Significantly changed conditions" are those resulting from unanticipated consequences of an adopted policy, or changed conditions on the subject property or its surrounding area, or changes related to the pertinent comprehensive plan map or text, where such change has implications of a magnitude that need to be addressed for the comprehensive plan to function as an integrated whole.

Staff Findings:

CPA2012-01- The Comprehensive Plan's Downtown Element was last amended in 2009, since then the Town Center Focus Area has seen approval of a large single-use structure for medical services. Upon further consideration and to help fulfill the vision of having a vibrant Town Center with mixed uses, active streetscapes, and ground floor commercial uses this amendment is proposed to ensure that any future multifamily development in the Town Center is part of a mixed use, multi-story structure with ground floor retail, restaurant and/or personal services uses.

CPA2012-02- The last changes to the Comprehensive Plan had no text, policy or map amendments related to annexation issues. These amendments are proposed in anticipation of future requests by property owners outside of the city's limits but within its urban growth area, requesting annexation to the city and the desire to ensure that there is appropriate text and policies to guide how the City Council evaluates such requests. These amendments will provide clear expectations to property owners of what information and findings they must provide to be annexed into the city.

(e) The proposed amendment is consistent with the comprehensive plan and other goals and policies of the City, the Countywide planning policies, the Growth Management Act, other State or Federal law, and the Washington Administrative Code and other applicable law.

Staff Findings:

CPA2012-01-This amendment is consistent with the vision of the Town Center as the heart of the downtown area in Covington. As described in the Comprehensive Plan, Downtown Goal DTG 2.0 is to implement a walkable, pedestrian scale mixed use development pattern that emphasizes the public realm in the heart of the downtown. A mixed use, multi-story structure with multifamily and/or office above a ground floor with commercial uses will provide for a more pedestrian oriented streetscape and a variety of services and uses for residents and workers in Covington.

This proposed amendment is consistent with the Countywide Planning Policies, the Growth Management Act, SEPA and the Washington Administrative Code for concentrated and sustainable growth and development in the city.

CPA2012-02-These amendments to the Comprehensive Plan's Introduction Chapter and Land Use Element and the inclusion of a new appendix will support the city's existing vision and goals to ensure there is orderly and well thought-out growth in the city. This amendment is also consistent with the Countywide Planning Policies, the Growth Management Act, SEPA and the Washington Administrative Code and these amendments are intended to ensure the orderly planning and development of land within the city's UGA so as to guide development in an orderly manner for the benefit of the city and its residents.

Development Regulation Amendment Review Criteria (CMC 14.27.040)

(1) The proposed amendment is consistent with the goals, objectives, and policies of the comprehensive plan;

Staff Findings: The proposed amendment to amend the Permitted Land Uses table found in CMC 18.31.080(3) with a new condition CMC 18.31.080(4) (26) and a revision to the Downtown Zoning Districts Density and Dimension Standards table in CMC 18.31.090(1), will implement the proposed comprehensive plan amendments contained in CPA2012-01 consistent with the vision, goals and policies of the Downtown Element of the Comprehensive Plan to ensure a vibrant and pedestrian friendly Town Center.

(2) The proposed amendment is consistent with the scope and purpose of the City's zoning ordinances and the description and purpose of the zone classification applied for;

Staff Findings: The proposed amendments are not-site specific and apply to any multifamily development in the town center focus area of the city's downtown. The amendments are consistent with the existing zoning code, and specifically the purpose and intent of the downtown development and design standards as provided for in CMC 18.31.010 (3).

- (3) *Circumstances have changed substantially since the establishment of the current zoning map or district to warrant the proposed amendment;*
Staff Findings: N/A. The proposed amendments will not affect the current zoning map or zoning district designations.
- (4) *The proposed zoning is consistent and compatible with the uses and zoning of surrounding property;*
Staff Findings: N/A. The proposed amendments do not affect the existing zoning of land in the City of Covington.
- (5) *The property that is the subject of the amendment is suited for the uses allowed in the proposed zoning classification;*
Staff Findings: N/A. The proposed amendments are not site-specific.
- (6) *The amendment is in compliance with the three-year limitation rule as specified in CMC 14.27.030(3); and*
Staff Findings: Amendments to the Town Center's Permitted Use Conditions for multifamily developments have not been proposed or subject to review by the City in the past three years.
- (7) *Adequate public services could be made available to serve the full range of proposed uses in that zone.*
Staff Findings: N/A. The proposed amendments will not change the zoning of any property in the City and will not create any increase demand for public services.

Recommendation

Recommended motion: Move to recommend to the City Council that the attached 2012 Docket of Comprehensive Plan and Development Regulations amendments be adopted.

Alternative motion: Move to continue the Planning Commission's discussion and final recommendation to a future meeting date to allow staff to make recommended modifications for Planning Commission review.

Proposed 2012 amendment

City of Covington Comprehensive Plan

DOWNTOWN ELEMENT

4.5 Goals and Policies

4.5.2 Town Center Focus Area

VISION: The Town Center Focus Area should be the central community-oriented heart of the downtown with public plazas and civic buildings, public spaces and landmarks, a mix of multi-story residential, office, service and retail uses; contain short block sizes on a rectangular grid system that are conducive to walking; focus around a traditional “Main Street” with sidewalk cafes and ground floor retail uses where Covington residents and visitors outside the community can come to shop, socialize, relax, and attend special community events; and be located south of SE 272nd St.

DTG 2.0 Use a new Town Center land use and zoning designation to proactively implement a walkable, pedestrian scale mixed-use development pattern that emphasizes the public realm at the heart of the downtown.

DTP 2.1 Apply the Town Center designation to a single area comprised of large parcels suitable for development or redevelopment that are central to downtown and accessible from highways and major arterials.

DTP 2.2 Allow one new large-format retail store to be built within the Town Center Focus Area. The City should adopt development regulations requiring this store to be located west of the proposed 171st Avenue SE, as projected. Any new large-format retail facility should be set back from the proposed 171st Avenue SE a sufficient distance to allow the future construction space for street-frontage, pedestrian-oriented retail, reasonable pedestrian connections, and complimentary uses along the proposed 171st Avenue SE. Access for service and delivery vehicles to the large-format retail facility should be prohibited from using the proposed 171st Avenue SE. There should be no curb cuts along the proposed 171st Avenue SE providing vehicular access of any kind to the large-format retail

facility (except for emergency vehicle access, if required by the Fire Marshall).

- DTP 2.3 The City should move forward with efforts to acquire property for a civic building and plaza space within the new Town Center Focus Area, that is consistent with the vision of the new Town Center Concept Plan, supports an interactive pedestrian-oriented Streetscape, and provides that unique, identifiable public gathering space with public business and community functions. The civic building and plaza space should support other potential future public investments such as a public parking facility, a transit center/park-and-ride facility, and a community center, and be adjacent to the pedestrian-oriented “Main Street”.*
- DTP 2.4 Encourage residential uses in the Town Center Focus Area at more urban densities, greater than 24 units per acre, making efficient use of prime land, supporting transit friendly and pedestrian-oriented retail, and encouraging inclusion of residential uses in new mixed-use projects with ground floor retail, restaurant and/or personal services.~~as well as supporting stand-alone multi-family housing developments.~~*
- DTP 2.5 Zoning and development regulations in the Town Center Focus Area should promote specific types and a mix of uses, building forms and public realm improvements described in the Town Center Vision statement, including retail, service, office, health care, and residential uses.*
- DTP 2.6 Provide incentives for innovative, affordable housing development and encourage workforce housing targeted for workers expected to fill retail and service jobs within the downtown.*
- DTP 2.7 Recognize Downtown as uniquely suited to supporting special-needs housing due to the convenience of nearby health services.*
- DTP 2.8 Encourage transit oriented development (TOD) where feasible, to locate within the Town Center Focus Area.*

Proposed in association with Comprehensive Plan Amendments 2012

Covington Municipal Code

Chapter 18.31

Downtown Development and Design Standards

18.31.080 Permitted land uses.

(1) The use of a property is defined by the activity for which the building or lot is intended, designed, arranged, occupied or maintained. The use is considered permanently established when that use will or has been in continuous operation for a period exceeding 60 days. A use which will operate for less than 60 days is considered a temporary use, and subject to the requirements of Chapter [18.85](#) CMC.

(2) Explanation of Permitted Use Table.

(a) The permitted use table in this chapter determines whether a use is allowed in a district. The name of the district is located on the vertical column and the use is located on the horizontal row of these tables.

(b) If the letters “NP” appear in the box at the intersection of the column and the row, the use is not permitted in that district, except for certain temporary uses.

(c) If the letter “P” appears in the box at the intersection of the column and the row, the use is allowed in that district subject to the review procedures specified in Chapter [14.30](#) CMC and the general requirements of the code.

(d) If the letter “C” appears in the box at the intersection of the column and the row, the use is allowed subject to the conditional use review procedures specified in Chapter [14.30](#) CMC and conditional use fees as set forth in the current fee resolution, and the general requirements of the code.

(e) If a number appears next to a specific use or in the box at the intersection of the column and the row, the use may be allowed subject to the appropriate review process indicated above, the general requirements of the code and the specific conditions indicated in the permitted use conditions with the corresponding number in the code subsection immediately following the permitted use table.

(f) All applicable requirements shall govern a use whether or not they are cross-referenced in a section.

(3) Permitted Use Table.

Use Categories	Town Center (TC) ²³	Mixed Commercial (MC)	General Commercial (GC)	Mixed Housing Office (MHO) ¹
Residential				
Dwelling Unit, Accessory	NP	NP	NP	P ²

Dwelling Unit, Multifamily	P ²⁶	P	P	P
Dwelling Unit, Single-Family Attached, Detached or Cottage Housing ²¹	NP	NP	NP	P ²
Senior Citizen Assisted Housing	P	P	P	C
Commercial				
Adult Entertainment	NP	P ³	P ³	NP
Business Services ¹⁹	P ⁵	P	P	P ^{4,5}
Drive Through Use	NP	P	P	NP
Farmers' Markets and Public Markets ⁶	P	P	P	NP
Gambling and Card Rooms	NP	NP	NP	NP
Home Occupation and Live/Work	P	P	P	P
Outdoor Commercial	NP	NP	P	NP
Personal and Beauty Services ^{20,21}	P	P	P	P
Private Electric Vehicle Parking Facility (Primary Use)			P ^{5,24}	
Private Parking Facility (Primary Use)	NP	NP	NP	NP
Professional Office	P	P	P	P
Retail Trade and Services – 100,000 sq. ft. or less for all structures	P ⁵	P	P ¹⁰	P ^{4,5}
Retail Trade and Services – greater than 100,000 sq. ft. for all structures	C ^{5,9,18}	P	P ¹⁰	NP
Shooting Ranges ²⁵	NP	NP	P	NP
Storage/Self Storage	NP	P ⁵	P	NP
Temporary Lodging/Hotel	P	P	P	C ²²
Cultural/Recreation				
Cinema, Performing Arts and Museums	P	P	P	NP
Meeting Hall/Other Group Assembly	P	P	P	C
Recreation, Indoor or Outdoor	C	P	P	P
Religious	C ⁷	P	P	C
Health Services				
Emergency Care Facility	C ^{9,18}	P	NP	NP
Hospital	NP	P	NP	NP

Medical Office/Outpatient Clinic	P ⁸	P	NP	P
Nursing/Personal Care Facility	NP	P	NP	C
Industrial/Manufacturing				
Asphalt Plants	NP	NP	NP	NP
Light Industrial/Manufacturing	NP	NP	P ¹⁰	NP
Government/Institutional ¹¹				
Essential Public Facilities	NP	NP	C	NP
Government Services	P	P	P	P ¹²
Major Utility Facility	C ¹⁴	C	P	C
Minor Utility Facility	P ¹⁵	P	P	P
Schools: Compulsory, Vocational and Higher Education	C ¹³	P	NP	C
Communication Facilities ¹⁶				
Antenna	P	P	P	P
Transmission Support Structure	C ¹⁷	C	P	NP

(4) Permitted Use Conditions.

1. a. Unless the use can be accommodated within an existing structure, development and/or redevelopment in the Covington Firs and Covington Township subdivisions shall be a minimum of two acres;
 - b. Be contiguous to a non-single-family use of two acres or more to be eligible to redevelop to a new use; and
 - c. Successive development cannot isolate existing single-family residential lots less than two acres (as a group) between developments.
2. a. No new subdivision of land is permitted for single-family homes except for townhouses and cottage developments. The exception is a binding site plan for commercial uses.
 - b. New single-family homes are allowed on existing single-family lots.
 - c. An accessory dwelling unit is allowed as an accessory to a single-family detached unit subject to the development standards in CMC [18.25.030\(7\)](#).
3. Adult entertainment uses are prohibited within certain locations pursuant to the development standards provided in Chapter [5.20](#) CMC and CMC [18.25.040\(2\)](#).
4. This use is restricted to a maximum of 5,000 gross square feet within the MHO district.

5. Services and operations other than customer parking shall be fully contained within a structure.
6. Temporary farmers' and public markets shall be permitted in accordance with CMC [18.85.125](#).
7. The development shall not occupy more than one acre for the total of the site development, including any planned phases and/or expansions.
8. a. Buildings greater than four stories shall provide 80 percent of required parking within a structure. Structured parking shall not front onto 171st Ave SE.
 - b. Medical office uses greater than two stories shall have a minimum of 60 percent ground floor retail trade and services and 40 percent business and professional services when fronting onto 171st Ave SE.
9. The development shall be located west of the proposed 171st Ave SE road alignment with frontage onto 168th PI SE or the planned SE 276th St. alignment.
10. All structures shall meet the required setbacks, landscaping and all other standards contained in this chapter. Equipment storage, manufacturing activities, and wrecked, dismantled and/or inoperative vehicles shall be enclosed in a structure or fully screened from public right-of-way, including SE 272nd St. and Covington Way with Type I landscaping in accordance with CMC [18.40.040](#).
11. Maintenance yards, substations and solid waste transfer stations are not permitted in the TC, MC, or MHO downtown zoning districts.
12. Transit stations and park and ride facilities, not including bus stops, shall be reviewed by a conditional use permit pursuant to CMC [18.125.040](#).
13. All schools for compulsory, vocational and higher education shall be located on the upper floors of a mixed use building that includes ground-floor commercial uses.
14. All facilities shall not occupy more than one acre of a site and the facility shall be screened with Type I landscaping in accordance with CMC [18.40.040](#).
15. Minor utility facilities, such as telecom, fiber optics, Internet and similar facilities, shall be located within a fully enclosed structure, unless otherwise determined by the Director.
16. Chapter [18.70](#) CMC, Development Standards – Communication Facilities, outlines the approval and review process. In the event of a conflict between the requirements of Chapter [18.70](#) CMC and the requirements of this chapter, Chapter [18.70](#) CMC shall govern.
17. All transmission support structures shall be mounted on a building.

18. a. Emergency care facilities shall not occupy more than four acres for the total of the site development including any planned phases and/or expansions of the emergency care use;

b. Shall not exceed 50,000 square feet of total building square footage; and

c. Shall not exceed more than two stories or 35 feet whichever is greater.

19. Gasoline service stations and battery exchange stations are limited to the general commercial and mixed commercial districts and subject to the following conditions:

a. A gasoline service station shall be limited to eight pumps and 16 price gauges to service no more than 16 vehicles.

b. A battery exchange station shall provide a minimum of three stacking spaces.

c. Stacking spaces and drive-through facilities shall be designed in accordance with CMC [18.50.080](#).

d. Any associated materials, equipment storage, outdoor storage tanks and battery exchange activities shall be within a fully enclosed structure, unless otherwise determined by the Director.

20. a. No burning of refuse or dead animals is allowed;

b. The portion of the building or structure in which animals are kept or treated shall be soundproofed. All run areas, excluding confinement areas for livestock, shall be surrounded by an eight-foot-high solid wall and surfaced with concrete or other impervious material;

c. Subject to animal keeping provisions of Chapter [18.80](#) CMC;

d. Prior to issuance of a development permit, documentation shall be provided by a qualified acoustical consultant, for approval by the Community Development Director, verifying that the expected noise to be emanating from the site complies with the standards set forth in WAC 173-60-040(1) for a Class B source property and a Class A receiving property;

e. Outside runs and other outside facilities for animals are not permitted;

f. Not permitted in any subdivision containing dwelling units; and

g. May only treat small animals on premises.

21. Day care I is allowed only as an accessory to a single-family detached unit.

22. Except bed and breakfasts, guesthouses are permitted outright and do not require a conditional use permit.

23. Mixed use structures greater than one story shall provide ground floor retail, restaurant, or personal services along 60 percent of the building facade. Permitted uses under the headings of cultural/recreation and governmental/institutional in subsection (3) of this section are exempt from this provision.

24. Parking facilities shall be fully screened from the public right-of-way with Type 1 landscaping in accordance with CMC [18.40.040](#).

25. a. The indoor shooting range, including its plans, rules, procedures, management and staff, shall comply with the applicable safety guidelines and provisions in the latest edition of “the Range Source Book” (National Rifle Association of America: Fairfax, Virginia) or its successor, as appropriate to the type of facility involved.

b. Any new development proposal and/or business license application for an indoor shooting range shall be accompanied by a notarized letter by the shooting facility operator that the facility complies with Federal and State regulations, meets commonly accepted shooting facility safety and design practices, and will be operated in a manner that protects the safety of the general public.

c. Outdoor shooting ranges are not permitted. (Ord. 04-12 § 1 (Exh. A); Ord. 01-12 § 1 (Exh. 1); Ord. 19-11 § 1 (Exh. 1); Ord. 10-10 § 1 (Exh. A))

26. Multifamily residential dwellings in the TC zone shall be located in a minimum three-story, mixed-use structure. 60% or more of the ground floor abutting a street, public space, public plaza and/or public green space shall be occupied by one or more of the following permitted uses: retail, restaurant or personal services. Driveways, service and truck loading areas, parking garage entrances and lobbies shall not be included in calculating the required percentages of ground floor use.

18.31.090 Downtown zoning districts density and dimension standards.

(1) Table of Density and Dimension Standards, Downtown Zoning Districts.

Standards	Town Center (TC)	Mixed Commercial (MC)	General Commercial (GC)	Mixed Housing Office (MHO)	Exceptions and Notes
Maximum Building Height	75 feet	60 feet	55 feet	45 feet	Maximum height shall be 45 feet within 50 feet of any zone outside of the downtown zone. In the MHO district, the 35 feet maximum height shall also apply within 50 feet of another MHO property.
Maximum Residential Density (stand alone)	<u>Not Permitted</u> Unlimited	60 D.U./acre	48 D.U./acre	24 D.U./acre	For cottage housing, CMC 18.37.040 shall control. <u>Stand alone residential structures are not permitted in the Town Center.</u>

Maximum Residential Density (if ground floor is commercial)	Unlimited	Unlimited	Unlimited	24 D.U./acre	
Minimum Residential Density	32 D.U./acre	24 D.U./acre	24 D.U./acre	12 D.U./acre	Residential use is not required in the downtown. For cottage housing, CMC 18.37.040 shall control.
Maximum Floor Area Ratio (FAR) with Bonus Features	4:1	3:1	3:1	2:1, 1.25:1 east of Wax Road	Refer to CMC 18.31.100 for bonus features.
Maximum Floor Area Ratio (FAR) without Bonus Features	1.5:1	1:1	1:1	1:1; .75:1 east of Wax Road	No minimum FAR. Development within the Jenkins Creek Corridor shall utilize low impact development (LID) techniques as adopted in CMC 13.25.020 .
Maximum Impervious Surface	80%	90%	80%	70%; 50% east of Wax Road and south of SE 272nd St.	Developments in the MHO located east of Wax Road and south of SE 272nd St., and cottage housing developments shall not exceed the 50% maximum impervious surface.
Minimum Lot Frontage Occupied by a Building	Type I Street – 80% Type II Street – 50% Type III Street – 50% Type IV Street – 40%	Type II Street – 50% Type IV Street – 40%	Type IV Street – 40%	None	A building shall be located within 5 feet of the back of sidewalk or on a public plaza. Where utility easements greater than 5 feet exist, the building shall be set back to the extent of the easement and this area shall be designed as an extension of the sidewalk and/or may be included as part of the public space requirement.
Minimum Setbacks within District	None	None	20 feet	10 feet	Except in the TC and MC districts, a minimum of 5 feet setback shall be provided from any public property other than a street.
Minimum Setbacks to Adjoining Downtown District	10 feet where adjoining the MHO District only	10 feet	N/A	10 feet	In districts other than the MHO, no setback shall be required for mixed use development or commercial building less than 50,000 square feet, with no significant outside storage or sales.
Minimum Setbacks to	0	20 feet	20 feet	20 feet	Refer to Design Standards Section B(1)(g) – Buffers and Transitions. No setback is required where a

Zones Outside the Downtown Zone					zone is separated from another zone by a street.
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(2) Additional Density and Dimension Development Standards Referenced in This Title.

- (a) CMC [18.30.060](#) through [18.30.090](#) for density measurement and calculation methods.
- (b) CMC [18.30.130](#) through [18.30.200](#) for measurement of setbacks and allowed projections into the setbacks. (Ord. 10-10 § 1 (Exh. A))

Proposed amendments to Covington's Comprehensive Plan related to annexation.

City of Covington Comprehensive Plan

1.0 INTRODUCTION

1.10 Criteria for Annexing Unincorporated Areas

Annexation of property within the UGA should benefit the City, its residents, and property owners. The City benefits by its increased ability to control new development with City standards, to extend its boundary in a logical manner, to expand its economic and tax base, to provide opportunities for new residential and commercial development that meet the needs of underserved populations, and to gain revenues from areas that enjoy City amenities but do not currently pay fees or taxes to the City. Property owners and new residents gain the ability to participate in local government, which directly impacts their lives and property. They also gain access to local services including police protection, code enforcement, building and land use controls.

The basic criteria for annexations ~~is~~ are established by King County. King County policy establishes the framework for ongoing and consistent responses to annexing properties located within the UGA. Policies to guide the annexation process have been adopted in Land Use, Environmental and Economic Development Elements of this Comprehensive Plan. In addition, Appendix T-3 contains specific cCriteria to direct the annexation process. Covington recognizes that the fiscal impact is only one of many criterion to be evaluated, and it must be balanced with other annexation policies such as protection of natural resources and environmentally sensitive areas, provisions of public services and infrastructure and infrastructure, and -helping the City meet its household and employment growth targets. will be developed regarding applicable regulations and development standards; regional mitigation of drainage and traffic problems; extension of streets and utilities; provision of services; consistent treatment of critical areas; public information; and administration.

2.0 Land Use Element

2.8.2 Urban Growth Area and Potential Annexation Areas

LNG 2.0 The City of Covington will designate ~~an~~ UGA and Potential Annexation Area, which will define Covington's planning area and projected city limits for the next 20 years.

LNP 2.1 ~~The UGA boundary shall be coordinated with~~ is determined by King County in consultation with the City of Covington, pursuant to RCW 36.70A. The UGA ~~and surrounding jurisdictions, and~~ will reflect the growth management population projections as provided by the state's office of financial management, the regional growth vision as expressed in Vision 2040 and the Countywide Planning Policies, and the vision, goals and policies provided in the city's Comprehensive Plan.

LNP 2.2 The UGA shall provide enough land to accommodate at least twenty years of projected growth of households and employment.

- LNP 2.3 Monitor the ~~UGA boundary~~ available land capacity within the city's UGA as build-out occurs and make necessary adjustments in coordination with King County, consistent with the Countywide Planning Policies.
- LNP 2.4 ~~Refine~~ Include all unincorporated urban areas adjacent to Covington within the Potential Annexation Area, working with King County, adjacent cities and jurisdictions, and citizens in Unincorporated King County.
- LNP 2.5 Coordinate future planning and interlocal agreements for Potential Annexation ~~Areas~~ Areas (PAA) with the appropriate agencies and jurisdictions. Work with King County to develop an interlocal agreement between the City and County for pending development applications in the PAAs to be processed by the County in a manner that is consistent with the City's Comprehensive Plan policies.
- LNP 2.6 Consider only annexations that are within the Potential Annexation Area. Annexations shall be phased to coincide with the ability of the City, ~~public services and districts~~ districts and utility purveyors serving the area to provide a full range of urban services to areas to be annexed.
- ~~LNP 2.7~~ Confer with water, sanitary sewer, solid waste, electric, natural gas, telecommunication and other public service providers to ensure their services can support the planned growth in the City and UGA, and meet desired customer service needs while maintaining existing levels of services in the City.
- ~~LNP 2.8~~ The City Council shall not make a decision on any Annexation request decisions shall not be made until a cost-benefit analysis is completed and the City Council has had adequate opportunity for review. ~~it, ed by the City Council.~~
- ~~LNP 2.9~~ Annexation areas should be able to pay its determined fair share of required services and should not have a negative financial impact on the City. Funding of certain facilities and services by property owners and residents of the annexation area may be a requirement of annexation.
- ~~LNP 2.10~~ Owners of land annexing to the City of Covington shall be subject to their proportionate share of the City's bonded indebtedness.
- LNP 2.11 ~~8~~ Designate future "Potential ~~Future~~ Annexation Areas" to facilitate long-range planning and decision making consistent with Covington's ~~growth~~ long term growth needs.
- LNP 2.12 ~~9~~ Actively pursue extensions of the UGA to include both sides of roads to enable roadway corridor improvements to be consistent on both sides of the corridor. Individual annexations should evaluate abutting roadways and intersections to assign responsibility for their construction and maintenance to a single jurisdiction. In some instances it may be appropriate to annex frontage lots on both sides of the road for consistent development.
- ~~LNP 2.13~~ Individual annexations should have access from a City street or state highway, and should represent a logical and timely expansion of the City's street network. Future street grid systems plans should be considered.
- LNP 2.14 ~~0~~ Actively pursue extensions of the Urban Growth Boundary to include City-owned lands.
- ~~LNP 2.15~~ Identify preferred future land uses in the Comprehensive Plan for the Potential Annexation Areas.
- ~~LNP 2.16~~ Appropriate zoning districts should be designated for property in an individual annexation proposal; zoning in the annexation area should be consistent with the comprehensive plan land use designations.
- ~~LNP 2.17~~ Individual annexations should improve environmental quality through identification and protection of open space corridors and critical areas, and the dedication and construction of trail and park systems, where appropriate.

- LNP 2.18 *Annexations should serve to square off City boundaries, and not divide lots or neighborhoods. The intent is to ensure practical boundaries in which services and infrastructure can be provided in a logical, effective and efficient manner.*
- LNP 2.19 *Individual annexation areas should be part of the logical, orderly growth of the city and avoid irregular boundaries that create an island, peninsula or bottle-neck of incorporated or unincorporated land.*
- LNP 2.20 *Annexation proposals should include areas that would result in City control over land uses along major entrance corridors to the City.*
- LNP 2.21 *Urban development within a Potential Annexation Area should not occur without annexation; unless there is an interlocal agreement with King County defining land use, zoning, annexation phasing, urban services, street and other design standards and impact mitigation requirements.*
- LNP 2.22 *Prior to annexation, ensure an orderly transfer to the city of all review authority for development applications pending review in King County. Where possible, joint development review should occur. An interlocal agreement should be considered between the City and County for pending development applications in annexed areas. Preference is for pending development application to be processed by the County on behalf of the City; but with City review to ensure that land develops under the City of Covington's Comprehensive Plan policies.*
- LNP 2.23 *Annexation requests should not be supported when the action would facilitate vested development proposals that are inconsistent with City standards, regulations and policies, unless waiving that requirement would achieve other City goals.*
- LNP 2.24 *Shoreline Master Program environmental designations, including those for associated wetlands, should be established during the annexation process.*

7.0 ENVIRONMENTAL ELEMENT

7.5.1 Incentives, Planning and Regulations

EVP 1.14 Assign zoning designations which will protect natural resources and environmentally sensitive areas to any additional land annexed to the City

12.0 ECONOMIC DEVELOPMENT ELEMENT

12.5.5 Commercial & Mixed Use Development

EDP 5.3 Focus retail and related commercial development to achieve downtown build-out, provide for convenience oriented neighborhood retail, and encourage mixed-use development with planned annexation areas to fully serve the needs of trade area residents and businesses.

12.5.6 Employment Development

EDP 6.3 Require property owners in planned annexation areas to engage in collaborative public-private land use and infrastructure planning for high quality master planned development.

12.5.7 Land Use & Economic Development

EDP 7.2 In cooperation with King County; provide for UGA expansion and annexation of areas most suited to meet 20-year commercial and employment land needs of the City of Covington.

City of Covington Comprehensive Plan

Appendix T-3

Annexation Process Criteria

Site-specific considerations such as critical areas, zoning, the efficient and cost effective delivery of services and/or extending infrastructure, and the concerns of adjacent residents, cities and King County should be considered by the City prior to the annexation of any Potential Annexation Areas. When evaluating annexation proposals, the following criteria will be given consideration. Review criteria are intended as guidance rather than standards.

- 1) A fiscal impact assessment shall be conducted of the costs to provide services and/or extend infrastructure and of the tax revenues that would be generated in each area proposed for annexation.
- 2) Revenues gained by the City through annexation should be at least equal to the additional costs incurred by the City or service providers for urban services and infrastructure to the area requesting annexation. The probability of substantial future financial benefit to the city should be considered when deciding on annexation proposals. Where reasonable, newly annexed areas shall be required to assume a proportionate share of the city's outstanding bonded indebtedness at the time of annexation. Reasonableness shall be determined by the City Council using the following criteria:
 - a. Whether and the degree to which the area to be annexed will benefit from the improvements funded by the bonded indebtedness;
 - b. The obligation of property owners within the area to be annexed to pay other outstanding bonded indebtedness for special district improvements, and the extent of that financial burden;
 - c. Whether other financial obligations (such as LID's) will be placed on property owners upon annexation, and the extent of those obligations;
 - d. The desirability to the city of annexing the area under consideration.
- 3) Individual annexation requests whose physical location would promote "leap frog" annexation, resulting in noncontiguous City limits, islands or bottle necks of unincorporated land, will not be considered. The City shall discourage annexations that would result in irregular City boundaries. Annexations shall include the largest practicable area contiguous to City limits that still result in logical City boundaries.
- 4) Annexations should be expanded if they include areas surrounded by the City on three or more sides or if they include properties with recorded covenants to annex.
- 4)5) The City shall only approve annexations that lie completely within the UGA and whose proposed zoning are consistent with the City's Comprehensive Plan. The land use designations specified in the Comprehensive Plan shall be used as guidance by the Planning Commission in determining

the recommended zoning classification. If there is no Comprehensive Plan land use designation, then the zoning designation Residential -4 should be placed on the annexed property until such time as a subarea plan is undertaken to appropriately identify new Comprehensive Plan and zoning designations. The land use designations, as determined by the City Council through their acceptance of the annexation, shall remain on the annexed properties for three years following annexation.

- 6) Consider individual annexation proposals based on an analysis and evaluation of the following:
- a. Urban levels of public services shall be provided at the City's adopted level of services standards (i.e.g. police and fire, schools, parks, open space, trails and recreation, transportation, storm water, sewer, water and other general government services);
 - b. The proposed annexation shall follow logical boundaries, such as streets, waterways, ridges, park property, trails, opens space corridors or substantial topographical changes;
 - c. The proposed annexation should include or exclude an entire neighborhood. The proposal should not divide portions of the neighborhood between City and County jurisdictions;
 - d. Critical Areas shall be identified, surveyed and appropriately protected consistent with the goals and policies of the Comprehensive Plan. Consider inclusion of open space corridors, either as greenbelts, trail corridors or urban separators, between the City and adjacent jurisdictions.
 - e. Consideration should be given to the availability of land within the city for the uses which would be developed upon annexation, encouraging infilling of existing undeveloped areas before extending services which allow similar development in peripheral areas unless there is a benefit to the community at large.
 - f. Evaluate proposed annexations to ensure that development enabled by the annexation is consistent with policies of the comprehensive plan specifically including population and employment growth targets.

Information and Studies Required

To adequately assess the merits of annexation proposals, the following information should be gathered, analyzed and presented to the City upon application for annexation.

1. Site Analysis. Necessary facts including existing conditions; acreage; number of residential units; businesses; industries; estimated population; street mileage, paved and unpaved; assessed valuations; existing utility services; existing parks and playgrounds; schools and public buildings; and Critical Area Study
2. Maps. Preparation of maps to show existing and proposed city boundaries relative to the urban service area, general land use patterns, existing and proposed land use designations, critical area surveys, existing major trunk water mains and proposed extensions, existing sewer interceptors and proposed extensions, existing streets, and existing public areas, such as playgrounds and schools.

3. Infrastructure Review. Existing public services should be inventoried and evaluated. Confer with affected public service districts and utility purveyors to assess the impact of the annexation on their facilities.
4. Urban Services Needs. Urban services, such as water services, sanitary sewers, stormwater utilities, garbage disposal, streets, street lighting, police and fire protection, hospital, planning, building inspection, library, park, open space and recreational facilities and services should all be analyzed for the need for major capital improvements and as well as annual operating needs. These needs should be considered in the city's determination and incorporated into the city or utility purveyor's capital improvement program if the proposed annexation is implemented. The city will work cooperatively with those public service districts and utility purveyors to determine the most rational and cost-effective means for providing urban level services to newly annexed areas and proposed land uses, on both a short and a long term basis, within parameters allowed in state statutes. The methods of providing such services to annexed areas should be described and their costs determined.
5. Special Issues. Any special circumstances created by the proposed annexation area should be discussed. Special circumstances may include infrastructure, public health or public safety problems, which the city may or may not be able to cost-effectively resolve, and potential impacts to the city due to development within proposed annexation areas at the expense of other developable areas within the city.
6. Fiscal Impact Analysis.
 - a. Service Requirement Costs. Estimated service requirements from the City, public service districts and utility purveyors, should be converted into financial requirements to determine the cost of extending or improving services and/or infrastructure to accommodate the proposed land uses. Needs and costs should be estimated for 5 years from the time of annexation, projecting a rate of growth which would also be used for projecting revenue estimates. Considerations of service costs should include:
 - i. Police protection: additional personnel, equipment, office space;
 - ii. Fire protection: additional personnel, equipment, hydrants, fire stations;
 - iii. Public services and private utilities: additional street lighting, road maintenance and construction, storm drainage, water and sewer construction and maintenance (including line replacement, pump stations);
 - iv. Parks and recreation: additional park acreage, trails, recreational programs, new facilities; and
 - v. Other governmental services such as: library, planning, building inspection, social service programs.
 - b. Estimate of Revenues. An estimate of potential revenues to accrue from the area should be made, and projected over a 5 year period. Existing methods of raising revenue that the city now has should be applied to the area being considered for annexation. These would include property taxes, state shared revenues, sales taxes, federal revenue sharing, business and occupation taxes, utility taxes, inspection and license fees, planning and zoning charges.

c. Cost-Revenue Analysis. The anticipated revenues should be compared with anticipated costs, including both projected additional annual operating expenses and major capital expenses. The cost-revenue analysis should be projected for 5 years in order to gain an understanding of the impact which development of the newly annexed area would have.

7. Community Identity. The nature of the area proposed for annexation relative to surrounding unincorporated areas as well as to adjacent city areas should be considered as well.