



CITY OF COVINGTON
CITY COUNCIL REGULAR MEETING AGENDA
www.covingtonwa.gov

Tuesday, January 12, 2016
7:00 p.m.

City Council Chambers
16720 SE 271st Street, Suite 100, Covington

Note: A Joint Study Session with Planning Commission is scheduled from 5:45 to 7:00 p.m.

CALL CITY COUNCIL REGULAR MEETING TO ORDER

ROLL CALL/PLEDGE OF ALLEGIANCE

SELECTION OF MAYOR

SELECTION OF MAYOR PRO TEM

RECEPTION FOR MAYOR HARTO, NEWLY ELECTED COUNCILMEMBERS, NEWLY ELECTED MAYOR AND MAYOR PRO TEM

APPROVAL OF AGENDA

PUBLIC COMMUNICATION - NONE

PUBLIC COMMENT Speakers will state their name, address, and organization. Comments are directed to the City Council, not the audience or staff. Comments are not intended for conversation or debate and are limited to no more than four minutes per speaker. Speakers may request additional time on a future agenda as time allows.*

APPROVE CONSENT AGENDA

- C-1. Minutes: November 10, 2015 Regular Meeting; November 24, 2015 Special Meeting-Joint Study Session with Planning Commission; November 24, 2015 Regular Meeting; December 8, 2015 Special Meeting; and December 8, 2015 Regular Meeting (Scott)
- C-2. Vouchers (Hendrickson)
- C-3. Appointments to Council's Audit Committee (Hendrickson)
- C-4. Accept Jenkins Creek Park Pedestrian and ADA Improvement Project (CIP 1041) (Vondran)
- C-5. Award City-Wide Intersection and Safety Improvements Project Construction Contract (CIP 1029) (Vondran)
- C-6. Accept Transportation Improvement Board Grant for Arterial Preservation Funds on 180th Avenue SE & SE 256th Street (Vondran)
- C-7. Council Appointments to Regional Boards and Committees (Council)

CONTINUED BUSINESS

- 1. Consider Ordinance Annexing the Hawk Property Annexation Area (Hart/Mueller)

PUBLIC HEARING

2. Receive Public Testimony and Consider Ordinance Relating to Periodic Major Updates and Adoption of the Proposed 2015-2035 Comprehensive Plan (Mueller/Hart)

NEW BUSINESS

3. Consider Planning Commission 2016 Work Plan (Hart)
4. Parks, Recreation and Open Space Plan Draft Review (Bahl/Feser)
5. Consider Setbacks on Accessory Structures Code Amendments Ordinance (Bykonen/Hart)

COUNCIL/STAFF COMMENTS - Future Agenda Topics

PUBLIC COMMENT *See Guidelines on Public Comments above in First Public Comment Section

EXECUTIVE SESSION

- To Discuss Potential Litigation Pursuant to RCW 42.30.110(1)(i).
- To Review the Performance of a Public Employee Pursuant to RCW 42.30.110(1)(g).

ADJOURN

Americans with Disabilities Act – reasonable accommodations provided upon request a minimum of 24 hours in advance (253-480-2400).

Agenda Item 2

Covington City Council Meeting

Date: January 12, 2016

SUBJECT: PUBLIC HEARING AND CONSIDERATION OF AN ORDINANCE
REGARDING THE PERIODIC UPDATE TO THE CITY'S COMPREHENSIVE
PLAN, AND ADOPTION OF THE PROPOSED 2015-2035 COVINGTON
COMPREHENSIVE PLAN.

RECOMMENDED BY: Richard Hart, Community Development Director
Ann Mueller, Senior Planner

ATTACHMENT(S):

1. Planning Commission Staff Report for the November 19, 2015 Public Hearing, including SEPA Determination and Addendum
2. Additional Documentation for the SEPA Record
3. Planning Commission's November 19, 2015, Meeting Minutes
4. Staff Response to Public Testimony at Planning Commission November 19, 2015 Public Hearing
5. Written Public Comments Received
6. Written Agency Comments Received
 - a. Washington Department of Commerce Letter Dated December 14, 2015
 - b. Puget Sound Regional Council (PSRC) Letter on Draft 2015 Comprehensive Plan Dated December 1, 2015, with City Response
 - c. PSRC Letter on Growth Assumptions Dated December 1, 2015, with City Response
 - d. PSRC Follow-up Letter dated December 18, 2015, with City Response
7. Proposed Ordinance Adopting the new 2015 - 2035 Covington Comprehensive Plan, with Exhibit A 2015 Covington Comprehensive Plan (*Note: Exhibit A-The 2015 Comprehensive Plan, and supporting background documents, were provided to the Council in a separate binder*).

PREPARED BY: Ann Mueller, Senior Planner

EXPLANATION:

A. BACKGROUND

As required under the Washington State Growth Management Act (RCW 36.70A) (the "GMA"), Covington's Comprehensive Plan is a principal planning and policy document that looks forward the next twenty years (2015 - 2035) and is used to guide the orderly physical development of the city and city decisions and services on a wide range of topics, including subarea plans, functional plans, provision of public facilities and services, review of proposed incorporations and annexations, development regulations, and land use decisions.

This periodic update process commenced in 2014 and involved a complete review and update to the city's comprehensive plan, resulting in the proposed new 2015 - 2035 Covington Comprehensive Plan (or "2015 - 2035 Plan"). The 2015 - 2035 Plan's overall priorities remain unchanged. However, the 2015 - 2035 Plan is intended to be a more concise and user friendly

document, building on the existing comprehensive plan document and other planning documents that have been prepared to plan for growth in the city including, but not limited to, the Hazard Mitigation Plan, Hawk Property Subarea Plan, Hawk Property Planned Action EIS, Downtown Plan, and the Northern Gateway Study and Market Analysis. Accordingly, the individual elements have been reorganized and the policies regrouped and edited for greater clarity. The 2015 - 2035 Plan also incorporates current demographic data, inventories, analyses, market studies, and forecasts of growth in development and employment. Furthermore, the proposed 2015 - 2035 Plan addresses state requirements relating to environmentally critical areas. Applicable policies, guidance, and/or language from Puget Sound Regional Council (PSRC) Vision 2040 and from King County's Countywide Planning Policies (2012) have also been incorporated and/or addressed.

B. PERIODIC UPDATE PROCESS

1. Community Participation

City staff and contracted consultants began working with the Planning Commission and the Covington community in 2014 on the required periodic update of Covington's Comprehensive Plan. Throughout 2014 and 2015, the city embarked on a community outreach campaign to provide numerous opportunities for community involvement and public input into the development and review of the proposed 2015 - 2035 Plan and the new and revised goals and policies directly reflect the input received from the community.

City staff and consultants held a community workshop on June 23, 2014, to kick-off outreach to the Covington community. Over four days in July 2014, city staff and consultants operated a "Storefront Studio" at Covington Square to allow the public to drop-in, ask questions, and provide comment. During the summer of 2014 city staff and consultants also held two evening public workshops and conducted a series of stakeholder interviews. Additionally, the city established a project webpage (www.covingtonwa.gov/update2015) and regularly posted information and draft documents.

2. Planning Commission Review and Recommendation

The Planning Commission reviewed drafts of the proposed new policies and draft elements at their public meetings throughout 2014 and 2015, and, on occasion, those meetings included an open house to allow interactive dialogue with the community, commission, and city staff. A Planning Commission public hearing to consider the proposed 2015 - 2035 Plan was held on November 19, 2015. (Attachment 1) The Planning Commission's recommendation that the City Council adopt the 2015 - 2035 Plan was also discussed at a joint study session with the City Council on November 24, 2015.

C. OVERVIEW OF NEW 2015 COMPREHENSIVE PLAN

1. Foundation for Review

This periodic update included preparing an Existing Conditions Report and a Review of Best Available Science Report as a foundation for examining the existing Comprehensive Plan and updating it to take into account the growth and changes to the Covington community since the

last major update and to make certain the goals and policies in the plan continue to guide decision makers to ensure that Covington’s quality of life is preserved and improved.

2. Condensed Elements

As part of the periodic update, the twelve elements of the existing Comprehensive Plan have been consolidated into eight elements: Land Use; Housing; Transportation; Economic Development; Natural Environment; Capital Facilities and Utilities; Parks, Recreation, and Open Space; and Shoreline Elements; along with a Plan Foundation chapter. The consolidation of elements was undertaken to eliminate redundancies and provide a more consistent and comprehensive assessment and policy guide for the city. This included combining the separate Capital Facility and Utilities Element into one element, eliminating the separate Downtown Element, and incorporating updated data and the goals and policies into other elements as appropriate, including the Land Use Element, Economic Development Element, and the Capital Facilities and Utilities Elements.

3. Highlights of the 2015 – 2035 Covington Comprehensive Plan

Highlights of the new components in the proposed 2015 – 2035 Plan include:

- 14 Framework Goals in the Plan Foundation (Chapter 1) that describe how Covington’s vision for an unmatched quality of life and mission to collaborate can be realized across a number of components. These goals are a bridge to the element specific goals and polices of the 2015 – 2035 Plan and cut across all disciplines.
- Updated the Existing Land Use Map & Future Land Use Map (FLUM) to correct errors and consolidate Land Use categories and designations. The new maps throughout the 2015 – 2035 Plan also include the Hawk Property annexation area that is scheduled on this same council meeting agenda to be accepted into the city (in an ordinance to be passed prior to the adoption of the 2015 – 2035 Plan).
- GMA directs that a comprehensive plan includes population densities, intensity of commercial development, and estimates of future population growth. The city received housing and job growth targets in the King County Buildable Lands Report from 2012-2031. Since comprehensive plans are required to address a 20-year period from 2015-2035, the target was extended in a straight line method following guidance from an interjurisdictional team of planning directors (Interjurisdictional Staff Team, 2013).
- Covington is a community of 18,520 persons in 2015, estimated to grow to 27,645 persons by 2035. In 2013, Covington had an estimated 4,753 jobs; based on a market analysis (BERK 2012), the city could add over 1.6 million square feet of commercial space by 2035. This would support over 3,700 additional jobs. That would mean a total of 8,459 jobs by 2035.
- If the city were to plan for its remaining growth target, it may “under plan” for the infrastructure and services needed to support the community’s desired levels of service. If the city were to plan for its growth capacity it may “over plan,” and service providers and

the city may invest scarce resources in infrastructure and services that are not yet needed. Thus, the city is basing this 2015 - 2035 Plan on the market demand study that not only accounts for the city's growth targets but also the likely level of growth based on the demand, in order to plan for capital facilities, utilities, and services that will help maintain Covington's quality of life.

- GMA requires inventories of existing transportation facilities and “[f]orecasts for at least ten years based on the adopted land use plan to provide information on the location, timing, and capacity needs of future growth.” The 2015 - 2035 Plan updates the inventories with current information. The city is planning for multiple modes of travel consistent with King County and PSRC's plans. New multimodal Level of Service (LOS) policies have been included that will help prioritize investments in pedestrian, bicycle, and transit facilities. The updated Transportation Element and existing conditions report include forecasts of volume, capacity, and desired levels-of-service related to the new growth estimates. The Transportation Element also contains updated revenue and expenditure figures to show that the transportation infrastructure necessary to serve the new growth can be funded. Supplemental inventory information is also provided in the Capital Facilities Appendix.
- As required by GMA, the 2015 - 2035 Plan reflects that public facilities and services are planning for and can accommodate the new growth estimates. The Capital Facilities and Utilities Element and Capital Facilities Appendix are designed to establish LOS for projected growth.
- The Capital Facilities Appendix provides information on capital facilities that serve the city including those owned and operated by Covington and other service providers such as Kent Regional Fire Authority, Kent School District, the Covington Water District, the Soos Creek Water and Sewer District, and King County Water District 111. The appendix provides a summary of each providers' facilities, LOS demand, and planned facilities.

At the January 12, 2016 City Council meeting, staff will provide a brief presentation on the 2015-2035 Comprehensive Plan prior to the public hearing.

D. REQUIRED REVIEW AND COMMENTS

1. State Environmental Policy Act (SEPA)

On November 13, 2015, the City of Covington issued a Determination of Significance and Adoption of Existing Environmental Documents and an Addendum. (Included in Attachment 1) The city requested comments on the environmental review from citizens, tribes, and all interested parties from November 13-27, 2015, with a subsequent appeal period that ended on December 11, 2015. No appeal of the determination was received. Attachment 2 is an Addendum errata that updates some of the information in the Addendum related to transportation data updates and minor corrections related to growth capacity based on the number of permits issued in 2006-2012. Neither change affects the city's overall SEPA analysis or determination.

2. Public and Agency Comments Received

At the Planning Commission's public hearing on November 19, 2015, public testimony regarding the proposed 2015 - 2035 Plan was received from Cliff Page, resident of Covington and Nicholas Skok, resident of unincorporated King County. (See Attachment 3 for meeting minutes from the November 19, 2015 Planning Commission public hearing; Attachment 4 is staff's response to that public testimony as was discussed at the November 24, 2015 City Council and Planning Commission joint study session.) Written comments on the proposed 2015 - 2035 Plan were received from Grazyna Prouty, resident of Kent, and Nicholas Skok, residing of unincorporated King County. (Attachment 5)

City staff also provided notice and, upon request, draft copies of the proposed 2015 – 2035 Plan and supporting documents to federal, state, and local jurisdictions and agencies for their review and comment. Written comments were received back from staff of the Washington State Department of Commerce and the Puget Sound Regional Council. (Attachment 6) Attachment 6 includes three letters from PSRC with city staff's response.

All of the received comments, noted above, were reviewed by city staff and applicable and relevant input and information was considered. Accordingly, city staff made some adjustments to the text, goals, and policies in the final draft of the proposed 2015 - 2035 Plan.

ALTERNATIVES:

1. Recommend amendments to the proposed ordinance and/or proposed 2015 – 2035 Covington Comprehensive Plan.
2. Return the issue to city staff for further study and analysis.

FISCAL IMPACT:

None directly associated with the adoption of the new 2015 – 2035 Plan. Printing costs will be required to print new copies of the plan, which will be accomplished within an existing line item budget of the city.

New policies and implementation strategies contained in the 2015 - 2035 Plan will guide how city decision makers prioritize and spend city funds in the future.

CITY COUNCIL ACTION: Ordinance Resolution Motion Other

Council member _____ moves, Council member _____ seconds, to pass an ordinance, in substantial form as that attached hereto, to approve and adopt the new 2015 - 2035 Covington Comprehensive Plan and repeal the 2001 Covington Comprehensive Plan and all amendments thereafter.

REVIEWED BY: City Manager, Community Development Director, Finance Director, City Attorney.



ATTACHMENT 1
Memo

To: Planning Commission
From: Richard Hart, Community Development Director
Ann Mueller, Senior Planner
CC: Salina Lyons, Principal Planner
Date: November 13, 2015
Re: Planning Commission Public Hearing on the 2015 Comprehensive Plan Periodic Update

Attachments:

- 1) SEPA Determination of Significance with Adoption of Existing Environmental Documents and an Addendum – Issued 11-13-2015
- 2) November 2015 Planning Commission Public Hearing Draft of the 2015 Comprehensive Plan Periodic Update.

The November 19, 2015 Covington Planning Commission public hearing on the 2015 Comprehensive Plan Periodic Update has been duly noticed, as required by law, in the Covington Reporter (May 30, 2014), posted on the city’s website and at city hall. A SEPA Determination of Significance with Adoption of Existing Environmental Documents and an Addendum was issued on November 13, 2015 (**Attachment 1**) and a 60-day notice of the city’s Comprehensive Plan Periodic Update was sent to the Washington Department of Commerce on October 29, 2015 as required by the Growth Management Act.

The Planning Commission has previously discussed the periodic update to the Comprehensive Plan starting in 2014 and in meetings throughout 2015. At the Planning Commission’s November 5, 2015 regular meeting, a public open house was held to review and discuss the public draft of the 2015 Comprehensive Plan Periodic Update. The Planning Commission received copies of the Introduction chapter and all eight of the draft elements. Those elements and the Existing Conditions Report and Capital Facility Appendix were posted on the project website for the commission and public to review. Staff provided an overview of the draft at the Open House and addressed questions from the public.

Revisions and updates to the prior Public Draft of the 2015 Comprehensive Plan Periodic Update have been made and are attached (**Attachment 2**). Updated versions of the Draft 2015 Comprehensive Plan Periodic Update as well as the [Capital Facilities Appendix](#) and [Existing Conditions Report](#) are uploaded on the project’s webpage at www.covingtonwa.gov/update2015. At tonight’s public hearing the Planning Commission will listen to any public testimony and after deliberating make a recommendation to the city council on the proposed 2015 Comprehensive Plan Periodic Update, or direct staff to make further modifications and bring those back at a future meeting. A joint Planning Commission and City Council study session is scheduled for November 24, 2015 at 6 p.m., where the Council will hear the

growing toward greatness.

Commission's recommendation and discuss the draft Comprehensive Plan Periodic Update. The City Council is currently scheduled to hold a public hearing on the 2015 Comprehensive Plan Periodic Update and take action on January 12, 2016.

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 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: The 2015 Comprehensive Plan Periodic Update is a requirement of GMA.

(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:

Yes, this required periodic update of the Comprehensive Plan is a public benefit and the changes enhance the public health, safety and welfare of the city. The city is updating the Comprehensive Plan to address the 2015-2035 planning period and demonstrate compatibility with state goals and regional plans. This 2015 Comprehensive Plan Periodic Update satisfies the requirements for periodic updates of comprehensive plans for those cities planning under the GMA, including consistency with King County Countywide planning policies, the Puget Sound Regional Council's VISION 2040, and the multi-county planning policies.

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

Staff Findings:

N/A. This is a required periodic update to the City's Comprehensive Plan as required by GMA.

(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:

N/A. The required periodic update is a comprehensive review of policies including land use issues for the city.

(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:

The Comprehensive Plan contained out-of-date and redundant information. In the intervening years since the last major update (2003), conditions have changed which is reflected in the updated data, revised text, new tables and figures being included as part of this update. An Existing Conditions Report was prepared for this update, it included an inventory of existing condition for each element required by GMA. The Existing Conditions Report provides the base information to support the changes and updates to the city's comprehensive plan.

This 2015 Comprehensive Plan Periodic Update is designed to assess existing conditions, plan for anticipated growth the next 20 years. The city must plan in coordination with King County and neighboring cities through Countywide Planning Policies for King County and through VISION 2040. The updated Comprehensive Plan includes an Introduction Chapter with Framework Goals, and the following elements, Land Use, Housing, Transportation, Economic Development, Natural Environment, Capital Facilities and Utilities, Parks Recreation and Open Space, and Shoreline. These eight elements are a consolidation of the 12 elements in Covington's 2003 Comprehensive Plan as amended; this consolidation was undertaken to eliminate redundancies and provide a more consistent and comprehensive assessment and policy guide for 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:

The proposed 2015 Comprehensive Plan Periodic Update is consistent with the Countywide Planning Policies, the Growth Management Act, State Environmental Policy Act and the Washington Administrative Code (WAC). The update is intended to ensure the orderly planning and development within the city's UGA and guide development in a predictable manner for the benefit of the city and its residents. The 2015 Comprehensive Plan Periodic Update presents eight separate but interrelated topic elements as well as appendices and background documents providing additional detail about Covington and fulfilling other planning requirements.

Recommendation

Recommended motion: Move to recommend to the City Council that the draft 2015 Comprehensive Plan Periodic Update be approved.

Commissioner _____ moves, Commissioner _____ seconds, to recommend approval of the draft 2015 Comprehensive Plan Periodic Update to the City Council, in substantial form.

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.



City of Covington
16720 SE 271st St. Suite 100
Covington, WA 98042

City Hall – 253.480.2400
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City of Covington 2015 Comprehensive Plan Periodic Update Environmental Review Determination of Significance with Adoption of Existing Environmental Documents

Proponent

City of Covington

Description of current proposal

The City of Covington is conducting its eight-year review and evaluation of its Comprehensive Plan pursuant to the Washington State Growth Management Act. The update is expected to be adopted in January 2016.

Covington's Comprehensive Plan Update addresses its 20-year population and employment growth targets. Each plan element's goals, policies and action plan are being reviewed and amended to address recent trends, consistency with state and regional goals. The city must plan in coordination with King County and neighboring cities through Countywide Planning Policies for King County and through VISION 2040, a regional plan adopted through the Puget Sound Regional Council. The updated Comprehensive Plan includes an Introduction Chapter with Framework Goals, and the following elements, Land Use, Housing, Transportation, Economic Development, Natural Environment, Capital Facilities and Utilities, Parks Recreation and Open Space, and Shoreline. These eight elements are a consolidation of the 12 elements in Covington's 2003 Comprehensive Plan as amended; this consolidation was undertaken to eliminate redundancies and provide a more consistent and comprehensive assessment and policy guide for the city. An Existing Conditions Report has been prepared to provide a base of information to support the preparation of the Comprehensive Plan and SEPA determination. The Capital Facility Appendix provides information on capital facilities that serve the city including those owned and operated by Covington and other service providers such as Kent Regional Fire Authority, Kent School District, the Covington Water District, the Soos Creek Water and Sewer District and King County Water District 111. A Best Available Science Report (BAS) was prepared to guide the development and revisions of policy in the Comprehensive Plan update.

Location of current proposal

Covington City Limits and Urban Growth Area

Adoption of Documents: Titles, Agencies, Dates, and Descriptions

The City of Covington adopts the following documents for the 2015 Comprehensive Plan Periodic Update:

City of Covington, Hawk Property Planned Action Environmental Impact Statement (Final EIS), November 14, 2013: addresses the Hawk Property Subarea (aka Lakepointe Urban Village) Plan and associated amendments to the comprehensive plan, zoning and development regulations that will allow for future mixed use urban village in an area encompassing approximately 212 acres. The analysis addressed citywide traffic modeling and mitigation at similar growth levels as the proposed Comprehensive Plan.

Puget Sound Regional Council, VISION 2040, Environmental Impact Statement (Final EIS), April 2008. Addresses growth and impacts across the region.

City of Covington Downtown Plan, Final Environmental Impact Statement, July 6, 2005: document addresses environmental issues associated with the Covington Downtown Plan that evaluated a 565-acre study area within the southern portion of the city and subsequent amendments to the Comprehensive Plan and Title 18 of the Covington Municipal Code (CMC).

City of Covington, 2003 Comprehensive Plan Amendment Docket, Addendum to Mitigated Determination of Nonsignificance, 2003.

City of Covington, 2002 Comprehensive Plan Amendments, Addendum to the 2001 Comprehensive Plan Mitigated Determination of Nonsignificance, 2002.

City of Covington, 2001 Comprehensive Plan, Mitigated Determination of Nonsignificance (MDNS), July 5, 2001. The City's plan was based on the King County Comprehensive Plan that was in effect when the City incorporated. An EIS was prepared for the County Plan which was released in 1994. The City's 2001 Comprehensive Plan for the most part did not change from that adopted by King County.

Determination and Addendum

The lead agency has determined this proposal is likely to have a significant adverse impact on the environment. To meet the requirements of RCW 43.21C.030(2)(c), the lead agency is adopting the documents described above. Under WAC 197-11-630, there will be no scoping process for this EIS.

We have identified and adopted these documents as being appropriate for this proposal after independent review. These documents meet our environmental review needs for the current proposal and will accompany the proposal to the decision maker.

An addendum to the adopted EISs in the form of a programmatic environmental review has been prepared regarding the Comprehensive Plan Periodic Update. This document includes a review of environmental factors and mitigation in the form of policies and development regulations. The addendum is available for review at Covington City Hall and at the project website: www.covingtonwa.gov/update2015.

Name of agency adopting documents

City of Covington

Comment and Review

The City of Covington is requesting comments on the environmental review from citizens, tribes and all interested parties from November 13 -27, 2015. All written comments should be directed to Ann Mueller, City of Covington Department of Community Development, 16720 SE 271st St. #100, Covington, WA 98042.

Agency contact person, if other than responsible official

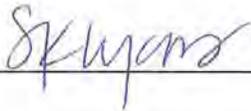
Ann Mueller, AICP, Senior Planner

City of Covington Department of Community Development, 16720 SE 271st St. #100, Covington, WA 98042
253-480-2444

amueller@covingtonwa.gov

Responsible official

Salina Lyons, AICP, Principal Planner (Acting Director of the Community Development Department and SEPA Responsible Official), City of Covington Department of Community Development, 16720 SE 271st St. #100, Covington, WA 98042
253-480-2442

Date of Issuance: 11-09-2015 Signature: 

Appeal

You may appeal this determination of significance by following the procedures in CMC 16.10.210. Any appeal must be filed in writing at Covington City Hall within 14 days after the end of the comment period (by 5pm on December 11, 2015). You must make specific factual objections, identify errors, identify harm suffered, or identify anticipated relief sought and raise specific issues in the statement of appeal. Contact the Community Development Department at Covington City Hall to ask about procedures for SEPA appeals.



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ADDENDUM

City of Covington 2015 Comprehensive Plan Periodic Update

1 Proposal

The City of Covington is conducting its eight-year review and evaluation of its Comprehensive Plan pursuant to the Washington State Growth Management Act. The update is expected to be adopted in January 2016.

Covington's Comprehensive Plan Update addresses its 20-year population and employment growth targets. Each plan element's goals, policies, and action plan are being reviewed and amended to address recent trends, consistency with state and regional goals. The city must plan in coordination with King County and neighboring cities through Countywide Planning Policies for King County and through VISION 2040, a regional plan adopted through the Puget Sound Regional Council. The updated Comprehensive Plan includes an Introduction Chapter with Framework Goals, and the following elements, Land Use, Housing, Transportation, Economic Development, Natural Environment, Capital Facilities and Utilities, Parks Recreation and Open Space, and Shoreline. These eight elements are a consolidation of the 12 elements in Covington's 2003 Comprehensive Plan as amended; this consolidation was undertaken to eliminate redundancies and provide a more consistent and comprehensive assessment and policy guide for the city. An Existing Conditions Report has been prepared to provide a base of information to support the preparation of the Comprehensive Plan and SEPA determination. The Capital Facility Appendix provides information on capital facilities that serve the city including those owned and operated by Covington and other service providers such as Kent Regional Fire Authority, Kent School District, the Covington Water District, the Soos Creek Water and Sewer District and King County Water District 111. A Best Available Science Report (BAS) was prepared to guide the development and revisions of policy in the Comprehensive Plan update.

2 Purpose of Addendum

The City of Covington has prepared this Addendum in order to evaluate and disclose potential environmental impacts and mitigating measures associated with the Proposal.

This Addendum builds on the analysis contained in the prior SEPA determinations, but does not significantly change the analysis, or identify new or significantly different impacts. The Addendum analysis indicates that the Proposal will result in similar impacts as prior EISs and SEPA determinations. Because the Proposal contains goals, policies and action plans designed to assure compliance with the Covington Municipal Code to reduce potential impacts to the natural and built environment, no new impacts beyond those studied previously are anticipated.

3 Documents Added

This addendum provides supplemental information to the City of Covington Hawk Property Planned Action Environmental Impact Statement (Final EIS), November 14, 2013 and City of Covington Downtown Plan, Final EIS, July 6, 200 and related SEPA documents described in Section 4.

The Hawk Property EIS addressed the City's second major center of mixed-use growth in eastern Covington, and studied the proposal in the context of citywide growth and transportation effects. The Downtown EIS studied the City's primary mixed-use center. These two EISs studied a range of growth levels and established the more substantive changes to the City's Comprehensive Plan since incorporation. The Comprehensive Plan Update is based on the results of the City's cumulative efforts to plan for these two centers, as well as the continued predominance of single family residential uses, parks, and other public properties.

4 Documents Adopted

An agency may use previously prepared environmental documents to evaluate proposed actions, alternatives or environmental impacts. The proposal may be the same as or different than those analyzed in the existing documents (WAC 197-11-600[2]). Pursuant to the Determination of Significance and Adoption of Existing Environmental Documents dated November 13, 2015, the City of Covington adopts the following documents as relevant to the 2015 Comprehensive Plan Periodic Update:

City of Covington, Hawk Property Planned Action Environmental Impact Statement (Final EIS), November 14, 2013: addresses the Hawk Property Subarea (aka Lakepointe Urban Village) Plan and associated amendments to the comprehensive plan, zoning and development regulations that will allow for future mixed-use urban village in an area encompassing approximately 212 acres. The analysis addressed citywide traffic modeling and mitigation at similar growth levels as the proposed Comprehensive Plan.

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5 Phased Environmental Review

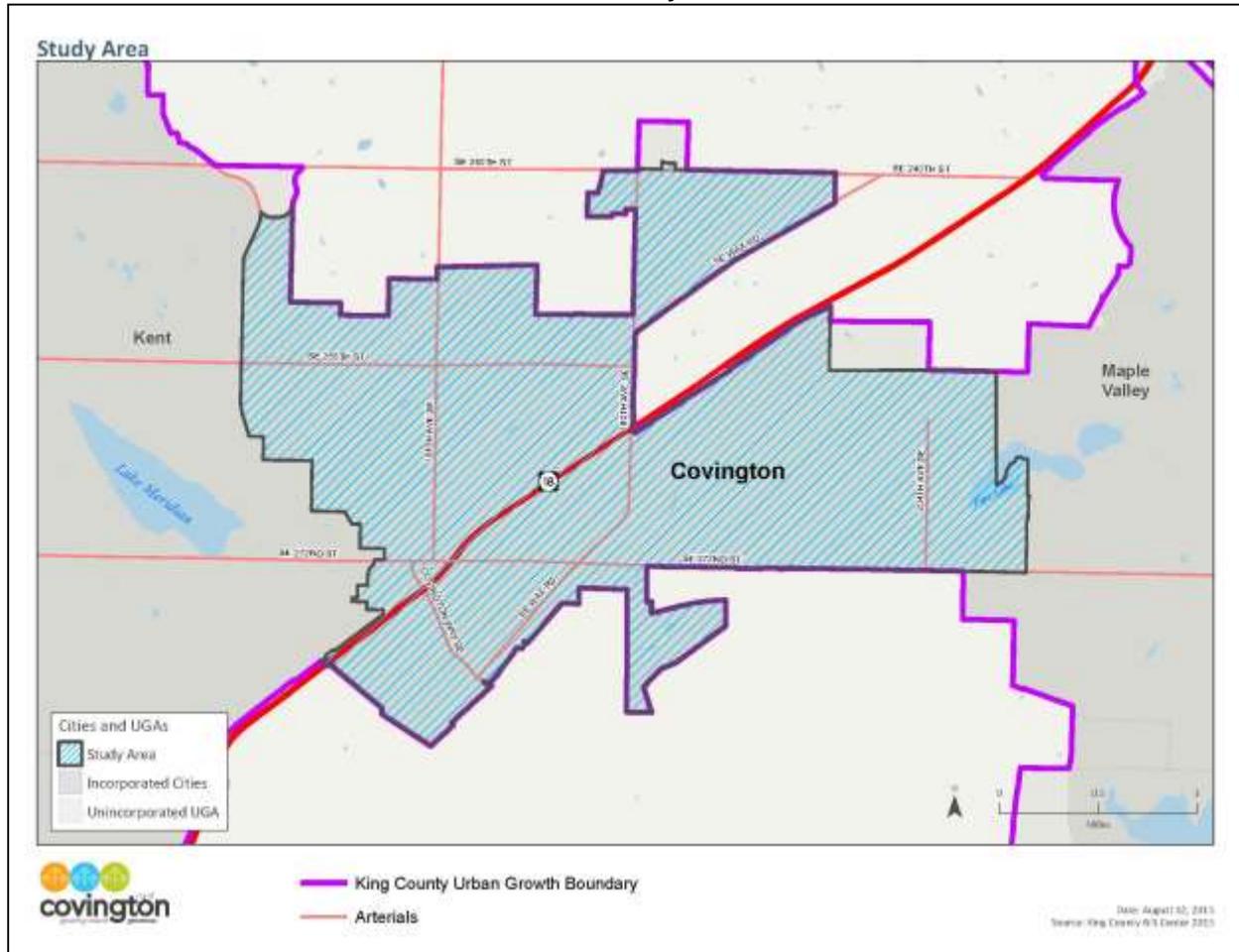
SEPA allows phased review where the sequence of a proposal is from a programmatic document, such as an EIS or SEIS addressing a comprehensive plan, to other documents that are narrower in scope, such as those prepared for site-specific, project-level analysis (WAC 197-11-060(5)). Additional environmental review will occur as other project or non-project actions are proposed to the City of Covington in the future. Phased environmental review may consider proposals that implement the Comprehensive Plan, such as land use regulations, specific development proposals, or other similar actions. Future environmental review could occur in the form of Supplemental EISs, SEPA addenda, or determinations of non-significance.

Programmatic Review of Comprehensive Plan Update

5.1 Study Area

The study area includes the Covington City Limits and Covington Urban Growth Area (UGA). See Exhibit 1. The city limits contain 6.55 square miles or 4,190 gross acres. The Covington UGA includes two Potential Annexation Areas: Tahoma High School parcel on 36.8 acres and a 75.6-acre portion of the Lakepointe Urban Village (Hawk Property Subarea).

Exhibit 1. Study Area



Source: King County Assessor 2015

6 Environmental Review

The Comprehensive Plan Update is a nonproject action, however future development and code amendments that occur after adoption of the Comprehensive Plan update may have the following impacts.

A. HOW WOULD THE PROPOSAL BE LIKELY TO INCREASE DISCHARGE TO WATER; EMISSIONS TO AIR; PRODUCTION, STORAGE, OR RELEASE OF TOXIC OR HAZARDOUS SUBSTANCES; OR PRODUCTION OF NOISE?

When site development occurs there may be fill and grade proposals, and vegetation may be removed, which may result in altered surface water flows, increased stormwater flow, localized flooding impacts, and generation of non-point source pollution to local surface waters. With greater impervious surfaces there would be less infiltration of groundwater. Groundwater impacts could include changes in groundwater availability and reduced subsequent discharge to streams and springs. Impacts to groundwater quality may result from infiltration of untreated stormwater, transportation related spills, and on-site spills of hazardous materials.

Emissions to air would most likely be associated with increased vehicle traffic. The proposal includes policy and action plan items to reduce reliance on vehicular use to curb growth in vehicular emissions, promotes transit use by focusing mixed-use residential and employment growth in the downtown and Lakepointe Urban Village.

Short-term air emissions including construction equipment exhaust and fugitive dust. During construction, dust from excavation and grading could cause temporary, localized increases in the ambient concentrations of fugitive dust and suspended particulate matter. All construction projects will be consistent with the City's erosion control development standards.

The intent of the Comprehensive Plan Periodic Update is to encourage a mixture of residential and commercial uses to reduce the need for daily-needs vehicle trips and create opportunities for living and working in close proximity. Mixed use development has been shown to reduce vehicle miles travelled which can reduce greenhouse gas emissions (US EPA March 2010¹). Further, the plan envisions pedestrian and bicycle improvements to encourage walking; a new multi-modal level of service (LOS) would help guide implementation of non-motorized improvements.

Land development that may occur following adoption of the plan and associated development regulations could create short-term noise impacts to land uses in the vicinity. Increases in traffic volumes generated within the study are likely the primary source of future noise.

Some commercial or industrial uses may handle hazardous materials though the Uniform Fire Code and state and federal laws would apply.

¹ As quoted in the US EPA 2011 paper Smart Growth: A Guide to Development and Implementing Greenhouse Reduction Programs, "[c]ompact development reduces the need to drive by putting destinations closer together and making walking, biking, and using mass transit easier. Any given increment of compact development could reduce VMT [vehicle miles traveled] up to 20 to 40 percent compared to dispersed development on the outer fringe of an urban area."

PROPOSED MEASURES TO AVOID OR REDUCE SUCH INCREASES ARE:

The City has adopted a Hazard Mitigation Plan (Tetra Tech 2014), which guides “planning efforts, policy changes, programs, projects, and other activities to mitigate hazard impacts on the City of Covington.”

At the time of building permit application, the International Building Code (IBC) includes conditions under which preparation of a geotechnical report would be required. Future development would also comply with City critical areas regulations to reduce health and safety risks related to geologic hazards, wetlands, and streams.

Development is subject to applicable federal (EPA), regional (Puget Sound Clean Air Agency), and State (Ecology) air quality regulations. Ecology air quality regulations applicable to the study area are found at Chapter 173-400 WAC.

Future development would comply with the City’s stormwater requirements in place at the time of application.

Maximum environmental noise levels are regulated by the State of Washington (Chapters 173-58 through 62 WAC).

Chapter 8.20 of the Covington Municipal Code (CMC) establishes regulations to minimize the exposure of citizens to excessive noise. The CMC clearly states the hours during which certain noisy activities are prohibited but does not specify numerical limits for permissible noise levels. The CMC prohibits sounds originating from construction activity between the hours of 8:00 p.m. and 7:00 a.m. on weekdays and 6:00 p.m. and 9:00 a.m. on Saturdays, Sundays, or Federal holidays.

New development of specific parcels will be subject to City zoning for allowable uses and activities, and City IBC and Fire codes for handling hazardous materials as well as State and Federal hazardous materials regulations.

Specific mitigation is also found in the Hawk Property Planned Action Ordinance regarding earth, surface water, groundwater, and noise.

B. HOW WOULD THE PROPOSAL BE LIKELY TO AFFECT PLANTS, ANIMALS, FISH, OR MARINE LIFE?

Covington features several creeks, including Big Soos Creek, Little Soos Creek, Jenkins Creek, Cranmar Creek, and North Jenkins Creek tributary. Pipe Lake is the only lake within Covington; however, smaller open water areas occur elsewhere in the City, such as Spring Pond in Jenkins Creek Park. Wetlands are generally associated with creeks and Pipe Lake as well as groundwater seeps.

In a 2012 analysis done as part of the Urban Forestry Strategic Plan, tree cover was approximately 37 percent.

Many animals can be found in Covington, including deer, elk, beaver, bald eagle, and great blue heron. The City includes habitat types that are known to be used or could potentially be used by species listed as endangered, threatened, or sensitive by state or federal government, including Chinook salmon and steelhead. Continuous wildlife corridors are found along riparian areas.

Future development allowed by the Comprehensive Plan and development regulations could affect plants and animals through land clearing for construction of housing and infrastructure, storm water runoff, and human disturbance associated with future growth. Environmental resources subject to risk of direct and indirect impacts include numerous species of plants, animals, and fisheries (including threatened or endangered species and their habitat).

Ongoing development could result in incremental habitat losses in the city and planning area. However, the protection of shorelines, critical areas, and associated of buffers limits impacts associated with directly adjacent disturbance.

PROPOSED MEASURES TO PROTECT OR CONSERVE PLANTS, ANIMALS, FISH, OR MARINE LIFE ARE:

The City has adopted an Urban Forest Strategic Plan (City of Covington, April 2013).

The City is proposing updated Natural Environment policies following a Best Available Science Review (The Watershed Company, fall 2015).

The City's Critical Areas Regulations (CMC 18.65) and Shoreline Master Program apply citywide where critical areas and shoreline jurisdiction are found. The City proposes to update the regulations based on a code audit (Parametrix 2015).

The City's surface and stormwater management regulations and guidelines would apply and rely on the most current manuals (as they may be amended over time per CMC 13.25.020):

- Department of Ecology Stormwater Management Manual for Western Washington (SWMMWW);
- Puget Sound Partnership Low Impact Development Technical Guidance Manual for Puget Sound (LID Manual) by Washington State University and Puget Sound Partnership;
- Washington State Department of Transportation Hydraulics Manual; and
- Appendix 1 of the NPDES Phase II Permit, except that erosivity waiver is not adopted.

C. HOW WOULD THE PROPOSAL BE LIKELY TO DEplete ENERGY OR NATURAL RESOURCES?

The Study Area is served by electricity, natural gas, and potentially solar energy. Service providers include Puget Sound Energy and Bonneville Power Administration. Energy is primarily used for heating. Mixed-use developments envisioned for the downtown and Lakepointe Urban Village can conserve energy and resources, relative to what would be expended by low-density suburban residential and single-use commercial development patterns.

PROPOSED MEASURES TO PROTECT OR CONSERVE ENERGY AND NATURAL RESOURCES ARE:

The City has adopted the International Energy Conservation Code as amended and published by the Washington State Building Code, Chapter 51-11R and 51-11C WAC.

The City is also considering sustainability policies as part of the Comprehensive Plan Update.

Air quality mitigation in the Hawk Property Planned Action Ordinance includes energy conservation measures.

D. HOW WOULD THE PROPOSAL BE LIKELY TO USE OR AFFECT ENVIRONMENTALLY SENSITIVE AREAS OR AREAS DESIGNATED (OR ELIGIBLE OR UNDER STUDY) FOR GOVERNMENTAL PROTECTION; SUCH AS PARKS, WILDERNESS, WILD AND SCENIC RIVERS, THREATENED OR ENDANGERED SPECIES HABITAT, HISTORIC OR CULTURAL SITES, WETLANDS, FLOOD PLAINS, OR PRIME FARMLANDS?

Greater population and employment growth would mean greater demand for parks and recreation facilities and services.

Regarding habitat, floodplains, and wetlands, critical areas protections would apply – see Section B above. Covington does not contain lands of long-term commercial significance for farming.

Prior to European settlement, the Stkamish, Smulkamis, and Skopamish people inhabited the Covington area. Eventually these tribes, together with other tribes along the White and Green Rivers, were resettled on the Muckleshoot Reservation, named for the prairie on which the reservation was established. (Kershner, 2013; Muckleshoot Indian Tribe, 2015)

Covington was originally known for lumber mills on Jenkins and Soos Creeks, and a place where irrigated berry farms and dairies were successful. As with other places in King County, following World War II, the community grew from a rural farming community into a suburb. (Kershner, 2013)

Some properties have been evaluated as potential historic resources, though there are no sites listed on the Washington State historic register. There is a heritage barn on 156th Ave SE. (Washington Department of Archaeology and Historic Preservation 2015)

PROPOSED MEASURES TO PROTECT SUCH RESOURCES OR TO AVOID OR REDUCE IMPACTS ARE:

The City’s Parks, Recreation, and Open Space (PROS) Plan allows the City to plan ahead for growth. The proposed Parks Element includes goals from the current PROS plan. The PROS plan is being updated and is expected to be adopted in 2016.

Future projects will comply with all State and federal laws including those summarized below.

- Washington State has a number of laws that oversee the protection and proper excavation of archaeological sites (RCW 27.53, WAC 25-48), human remains (RCW 27.44), and historic cemeteries or graves (RCW 68.60). Under RCW 27.53, Department Archaeology and Historic Preservation regulates the treatment of archaeological sites on both public and private lands and has the authority to require specific treatment of archaeological resources. All precontact resources or sites are protected, regardless of their significance or eligibility for local, state, or national registers. Historic archaeological resources or sites are protected unless DAHP has made a determination of “not-eligible” for listing on the WHR and the NRHP.
- In the event that human remains, burials, funerary items, sacred objects, or objects of cultural patrimony are found during project implementation, all provisions of RCW 68.50.645 apply including notification of appropriate authorities.
- In the event that prehistoric artifacts or historic-period artifacts or features are found during project implementation, all work must cease within 200 feet of the find, Washington State Department Archaeology and Historic Preservation must be contacted, and all provisions of RCW 27.53.060 would be adhered to.

E. HOW WOULD THE PROPOSAL BE LIKELY TO AFFECT LAND AND SHORELINE USE, INCLUDING WHETHER IT WOULD ALLOW OR ENCOURAGE LAND OR SHORELINE USES INCOMPATIBLE WITH EXISTING PLANS?

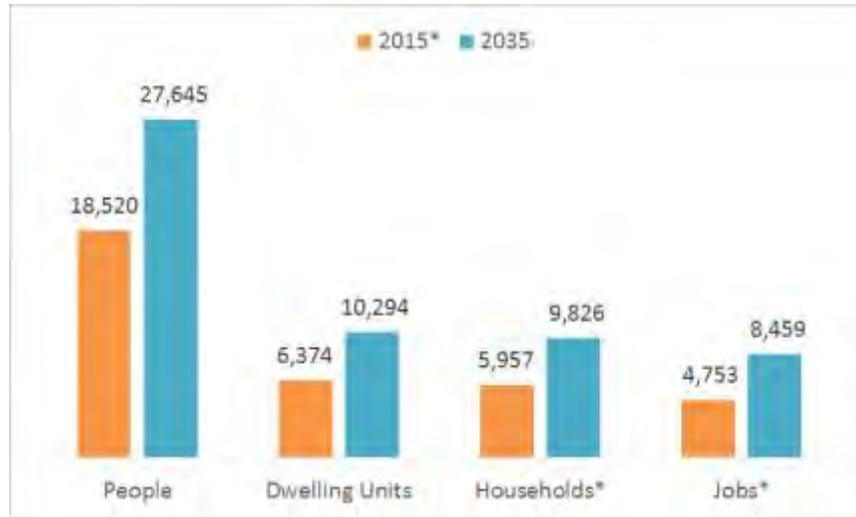
Population and Employment Growth

Covington’s 2015 Comprehensive Plan Periodic Update is designed to plan for the growth in the City’s planning area expected over a 20-year period – 2015 to 2035. The City’s land use plan must accommodate the expected growth consistent with the community’s vision. In turn the growth must be supported by the transportation, parks, open space and recreation element, and capital facilities plan. The City received housing and job growth targets in the King County Buildable Lands Report from

2012-2031. Since Comprehensive Plans are required to address a 20-year period from 2015-2035 the target was extended in a straight line method following guidance from an Interjurisdictional Team of planning directors (Interjurisdictional Staff Team, 2013).

Covington is a community of 18,520 persons in 2015, estimated to growth to 27,645 persons by 2035. In 2013, Covington had an estimated 4,753 jobs, based on a market analysis (BERK 2012), the city could add over 1.6 million square feet of commercial space by 2035. This would support over 3,700 additional jobs. That would mean a total of 8,459 jobs by 2035.

Exhibit 2. Estimated Population, Housing, and Jobs: 2015 and 2035



Note: * Households and Jobs are 2013 estimates.

Source: OFM 2015, ACS 2013, ESD 2013, BERK Consulting 2015

The City is required to accommodate its fair share of growth in its Comprehensive Plan. The City has grown continuously even through the Great Recession and has already made significant progress towards its growth targets, especially jobs.

Exhibit 3. Targets and Capacity: 2012-2035

Targets and Capacity		Housing	Jobs
Housing Growth Target (2006-2031)		1,470	1,320
Permits 2006-2012 (issued/finaled)	-	163	1,148
Remaining Target 2012-2031	=	1,307	172
Extended Target 2031-2035	+	235	211
Remaining Target 2012-2035	=	1,542	383
Pending Development 2012, updated 2015	+	785	514
Hawk Property Capacity	+	1,500	1,889
Parcel Capacity 2012, updated 2015	+	2,164	2,093
Total Capacity	=	4,449	4,496
Capacity Surplus (Deficit) versus Target		2,907	4,113

Source: City of Covington; BERK Consulting 2015

The City’s land use plan would have more than sufficient land use capacity to meet its growth targets adopted by King County.

If the City were to plan for its remaining growth target, it may “under plan” for the infrastructure and services needed to support the community’s desired levels of service. If the City were to plan for its growth capacity it may “over plan” and service providers and the City may invest scarce resources in infrastructure and services that are not yet needed. The City is basing its Comprehensive Plan Update on the market demand study that not only accounts for the City’s growth targets but also the likely level of growth in order to plan for capital facilities, utilities, and services that will help maintain Covington’s quality of life.

Exhibit 4. Growth Targets, Market Demand, Land Capacity



Source: BERK Consulting 2015

Land Use Compatibility

The City of Covington adopted its first Comprehensive Plan shortly after incorporation using portions of the King County Comprehensive Plan. The City’s Comprehensive Plan was approved in 2001 and amended in 2002, 2003, 2005, 2008, 2009, 2011, 2012, 2013, and 2014. The updated Comprehensive Plan includes an Introduction Chapter with Framework Goals, and the following eight elements, Land Use, Housing, Transportation, Economic Development, Natural Environment, Capital Facilities and Utilities, Parks Recreation and Open Space, and Shoreline.

The predominant land use within Covington’s city limits is single family residential. While single family residential use will remain Covington’s predominant land use, there is limited vacant land left to develop for single family residential uses. Covington’s population has more senior citizens and households with lower or moderate incomes; greater housing variety such as townhomes and mixed-use residential would help meet changing needs in the community.

The City is actively planning for well-designed, high quality mixed-use development focused in the Town Center zone and within portions of the Lakepointe Subarea. By focusing most growth in these two areas, the City can maintain the quality and character of existing residential neighborhoods while meeting the community’s changing needs for housing variety and offering more pedestrian amenities, public gathering spaces, and gridded streets.

Shoreline Compatibility

Segments of Big Soos Creek, Jenkins Creek, and Pipe Lake are shorelines of the state in Covington. Predominant uses along Covington shorelines include low density residential, utility, and other lands. The stream corridors contain floodplains and wetlands; minimal critical areas are located along Pipe Lake. Planned land uses match present uses – residential, industrial (utility), and public. There are some adjacent public access locations just outside the Soos Creek and Jenkins Creek shoreline jurisdiction boundaries.

PROPOSED MEASURES TO AVOID OR REDUCE SHORELINE AND LAND USE IMPACTS ARE:

The City's zoning code (Title 18) provides specific zoning regulations guiding land use, bulk, height, landscaping, parking, as well as critical areas regulations. Design guidelines apply to the downtown and Lakepointe properties. Future development would be subject to these standards.

The City's Shoreline Master Program (SMP) has been prepared consistent with the SMA and provides goals, policies, and regulations of each shoreline.

F. HOW WOULD THE PROPOSAL BE LIKELY TO INCREASE DEMANDS ON TRANSPORTATION OR PUBLIC SERVICES AND UTILITIES?

Future growth would add multimodal trips to the City's transportation network, and increase demand for public facilities and services.

Transportation

Vehicular Traffic Operations

Vehicle operations on city streets are measured according to LOS at major intersections during the weekday PM peak hour, which is the period in which the highest traffic volumes typically occur. Level of service is a qualitative measure used to characterize traffic operating conditions based upon average delay experienced by vehicles. Six letter designations, "A" through "F," are used to define LOS. LOS A and B represent conditions with the lowest amounts of delay, and LOS C and D represent intermediate traffic flow with some delay. LOS E indicates that traffic conditions are at or approaching congested conditions and LOS F indicates that traffic volumes are at a high level of congestion with unstable traffic flow.

Level of service for intersections is defined in terms of average delay per vehicle in seconds. Exhibit 5 shows the LOS criteria for signalized and unsignalized intersections, as defined in the Highway Capacity Manual (Transportation Research Board, 2010).

Exhibit 5. Level of Service Criteria for Vehicle Operations

Level of Service (LOS)	Average Delay Per Vehicle	
	Signalized	Unsignalized
A	≤ 10.0 seconds	≤ 10.0 seconds
B	10.1 – 20.0 seconds	10.1 – 15.0 seconds
C	20.1 – 35.0 seconds	15.1 – 25.0 seconds
D	35.1 – 55.0 seconds	25.1 – 35.0 seconds
E	55.1 – 80.0 seconds	35.1 – 50.0 seconds

Level of Service (LOS)	Average Delay Per Vehicle	
	Signalized	Unsignalized
F	> 80.0 seconds	> 50.0 seconds

Source: Transportation Research Board, 2010.

Under GMA, concurrency is the requirement that adequate infrastructure be planned and financed to support the City's adopted future land use plan. Level of service standards are used to evaluate the transportation impacts of long-term growth and concurrency. In order to monitor concurrency, the jurisdictions adopt acceptable operating conditions on their streets that are then used to measure existing or projected traffic conditions and identify deficiencies.

Exhibit 6 summarizes the LOS standard established by the City for city streets in the proposed Comprehensive Plan; it is similar to the City's current LOS measures but accounts for the ultimate capacity design of SE 272nd.

Exhibit 6. Level of Service Standard for City Streets

Street Intersection	Standard ¹
Signalized, roundabout-controlled and all-way stop controlled intersections of all Arterial and Collector streets, except SE 272 nd Street (SR 516)	LOS D or better.
Signalized intersections along SE 272 nd Street (SR 516)	LOS D or better, until an ultimate capacity of five lanes (two travel lanes in each direction plus a center left-turn lane) plus sidewalks on both sides is reached for SE 272 nd Street. Once ultimate capacity is reached, vehicle operation worse than LOS D is acceptable.

1. Level of service for the weekday PM peak hour, based upon methods set forth in the current version of the Highway Capacity Manual, unless otherwise authorized by the Director of Public Works.

Sources: City of Covington and Heffron Transportation 2015

Exhibit 7 summarizes existing LOS at the concurrency intersections. As shown, all intersections currently meet the LOS standards for city streets and no existing deficiencies are identified.

Exhibit 7. Existing (2012) Level of Service at City Concurrency Intersections – PM Peak Hour

ID	Intersection	Standard	LOS ¹	Delay ²
Signalized				
4	SE 251 st St/164 th Ave SE	D	A	6.9
7	SE 256 th St/156 th Ave SE	D	A	7.6
9	SE 256 th St/168 th PI SE	D	A	8.7
11	SE 256 th St/180 th Ave SE	D	C	37.0
14	SE 262 nd St/180 th Ave SE	D	B	12.4
21	SE 272 nd St (SR 516)/Covington Way	UC ³	E	56.6
22	SE 272 nd St (SR 516)/164 th Ave SE	UC ³	D	37.5

ID	Intersection	Standard	LOS ¹	Delay ²
23	SE 272 nd St (SR 516)/Westbound SR 18 Ramps	UC ³	C	28.1
24	SE 272 nd St (SR 516)/Eastbound SR 18 Ramps	UC ³	D	36.9
26	SE 272 nd St (SR 516)/168 th Ave SE	UC ³	C	25.1
29	SE 272 nd St (SR 516)/172 nd Ave SE	UC ³	C	32.7
32	SE 272 nd St (SR 516)/SE Wax Rd	UC ³	D	43.2
34	SE 272 nd St (SR 516)/192 nd Ave SE	D	B	14.8
40	Covington Way/SE Wax Rd	D	C	21.0
43	SE 270 th Pl/SE Wax Rd	D	B	16.6
57	SE 272 nd St (SR 516)/185 th Ave SE	D	C	25.7
59	165 th Pl SE/Covington Way	D	B	18.4
233	Kenmore High School Dwy/164 th Ave SE	D	A ⁴	<10.0 ⁴
	Roundabout			
8	SE 256 th St/164 th Ave SE	D	B	10.9
17	SE 267 th Place/SE Wax Rd/180 th Ave SE	D	A	7.4
44	SE 270 th Place/172 nd Ave SE	D	A	5.8
	All-Way Stop-Control			
2	SE 240 th St/196 th Ave SE	D	B	12.7
5	SE Wax Rd/ 180 th Ave SE	D	B	13.2
15	SE Timberlane Boulevard/Timberlane Way SE	D	B	10.3
19	SE 267 th St/Timberlane Way SE	D	B	10.6

1. LOS = Level of Service

2. Delay = Average delay for all vehicles through the intersection in seconds per vehicle

3. UC = Ultimate Capacity provided on SE 272nd Street (SR 516); operation worse than LOS D acceptable.

4. Existing data is not available for this intersection, but existing level of service (LOS) is estimated based upon future conditions analysis completed at this intersection, which projects LOS A operation through 2035.

Sources: David Evans and Associates and Heffron Transportation 2015

Exhibit 8 summarizes capacity improvements that have been identified to meet roadway concurrency through 2035, in addition to continued implementation of the SE 272nd Street widening and other projects included in the current TIP. All of these locations are operating within the LOS D standard under existing conditions, and will be monitored to determine the point at which land use growth triggers a need for improvement.

Exhibit 8. Street Improvement Projects to Meet Concurrency

ID	Intersection	Improvement	LOS Standard	Unmitigated		With Mitigation		
				LOS ¹	Delay ²	LOS ¹	Delay ²	
Stop-Controlled								
2	SE 240 th St/ 196 th Ave SE	Add eastbound left-turn lane	D	E	38.8	D	34.1	
5	SE Wax Rd/ 180 th Ave SE	Add northbound right-turn lane or signalize	D	E	37.0	C	21.1	
Signalized								
11	SE 256 th St/ 180 th Ave SE	Address through design of Capital Improvement Program (CIP) project #1056/1149	D	E	59.6	(1)	(1)	
40	Covington SE Wax Rd	Way/ Add southbound left-turn lane	D	E	71.8	C	25.2	

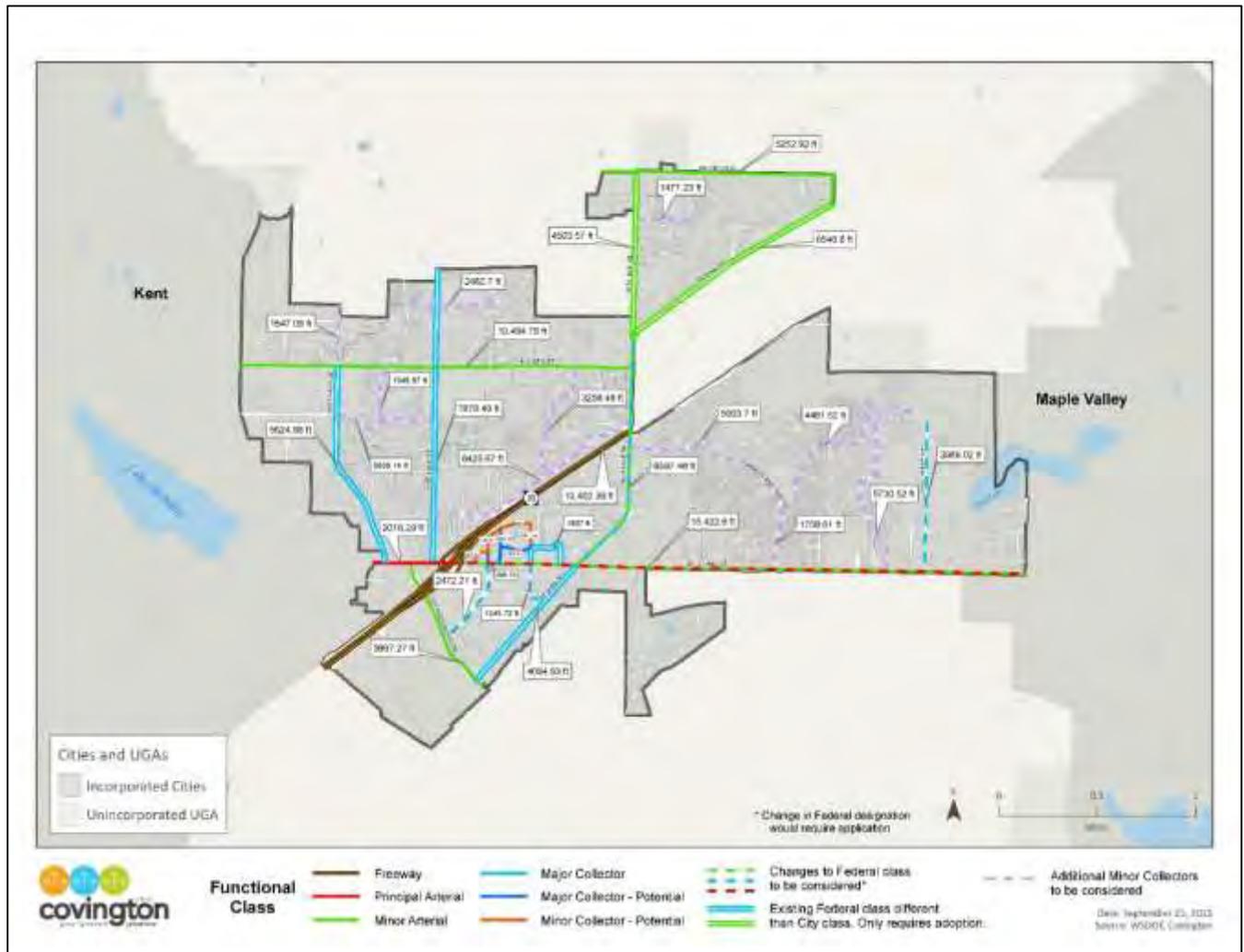
1. Determined through design of Capital Improvement Program (CIP) project # 1056/1149
Sources: David Evans and Associates and Heffron Transportation 2015

Functional Classifications

The functional classifications of city streets are an important component of long range transportation planning because they reflect the mix of property access and traveler mobility that each street is intended to serve, and help determine the appropriate mix of facilities (e.g. vehicle lanes, walkway, bikeways, and/or buffer areas) that should be included on each street, based on the available space. Additionally, designating a street with the appropriate functional classification is critical when seeking federal or state grant funding for potential improvements.

Over time, shifts in land use and traffic patterns may cause the function of a street to change. Thus, it is important to periodically review the functions city streets serve, and evaluate whether any changes in classification are warranted. Guidelines set forth by the Federal Highway Administration (FHWA) and WSDOT were applied to identify appropriate updates to the federal functional classifications of city streets; considerations include existing and projected future traffic volumes, characteristics of surrounding land uses and the balance between mobility and access the street provides, overall spacing of arterials and collectors within the city, and the proportions of each classification within the street system. Recommended updates to street classifications are proposed with the Comprehensive Plan Update. Exhibit 9 shows the city street system, with recommended updates to the roadway functional classifications.

Exhibit 9. Covington Street Functional Classification Map with Recommended Updates



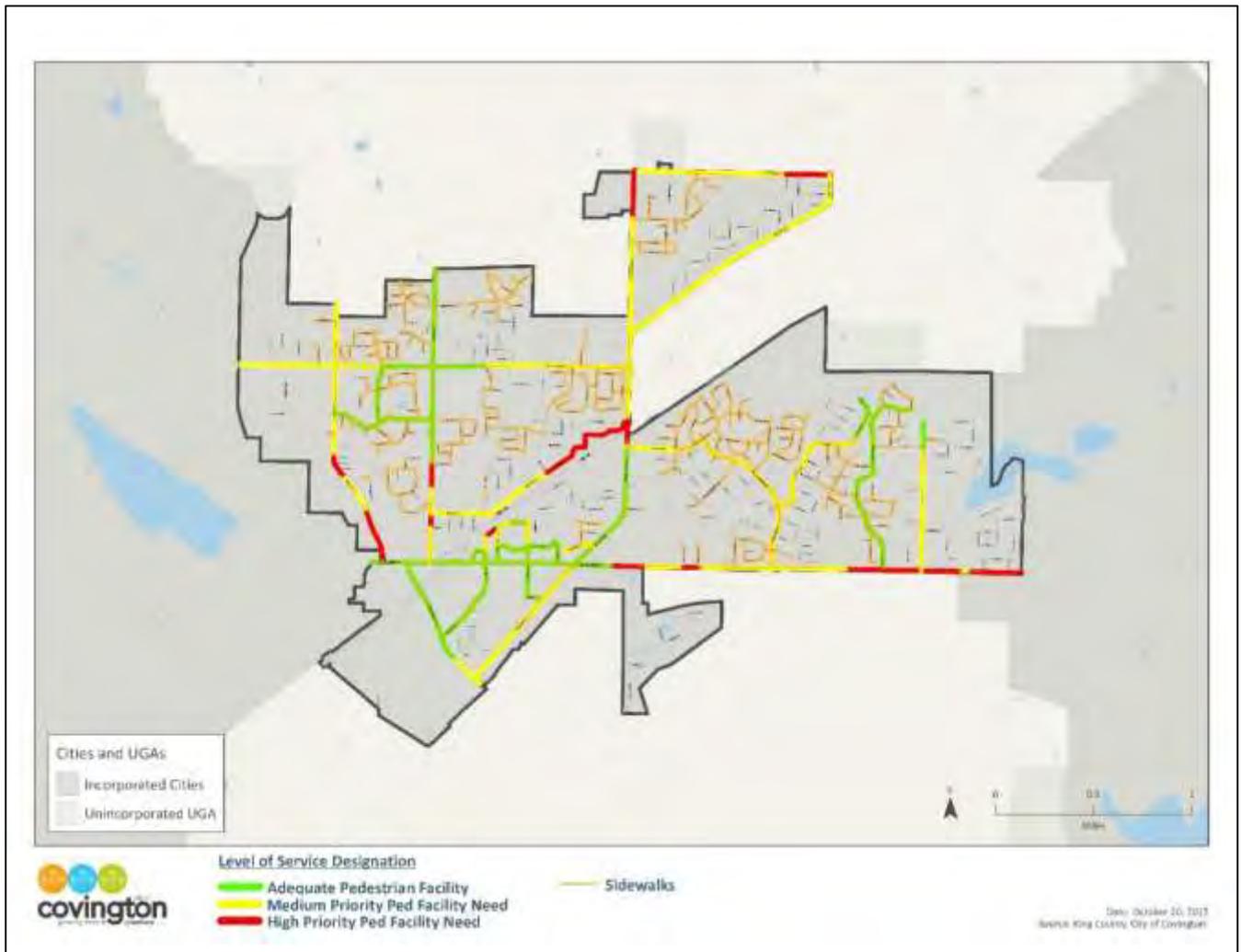
Source: City of Covington 2015

Non-motorized Improvements

The City is proposing a layered network approach that focuses on how the City’s transportation network can function as a system to meet the needs of all users. Unlike roadway standards that are capacity-based, the City’s proposed LOS standards for pedestrian and bicycle facilities recognize the primary objective of providing a complete non-motorized network that allows people to safely walk or bike between destinations in Covington, providing separation from vehicle traffic where needed. This can be achieved by providing separate vehicle and non-motorized facilities along a street where space allows, but it may also be achieved by identifying alternate routes for pedestrians or bicyclists that are parallel to corridors with high vehicle volumes. The proposed approach also recognizes that on many low-volume and low-speed local access streets, vehicular and non-motorized traffic may safely share the roadway.

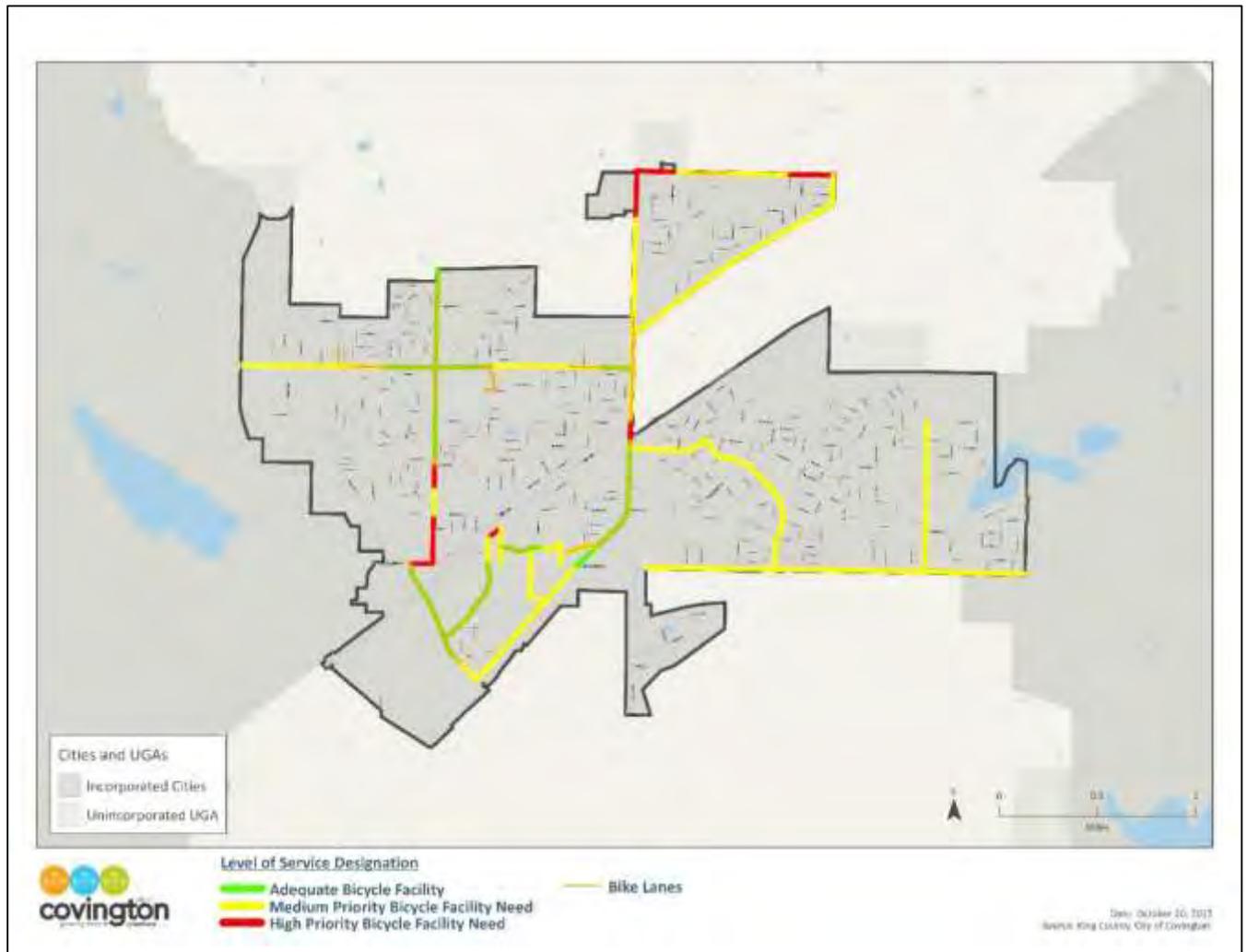
Exhibit 10 shows the medium and high priority walkway needs, and Exhibit 11 shows the medium and high priority bike facility needs, based upon the City’s proposed walkway and bike facility LOS standards in the draft Transportation Element.

Exhibit 10. Covington Sidewalk Inventory and Pedestrian Level of Service Map



Source: City of Covington 2015

Exhibit 11. Covington Bicycle Inventory and Level of Service Map



Source: City of Covington 2015

The City implements walkway and bike facility improvements to address medium (yellow) and high (red) priority needs identified the maps above as follows:

- Medium and high priority pedestrian and bicycle facility needs are addressed as required frontage or connector improvements for new development, or as part of larger multimodal corridor improvements. Corridors with medium or high priority non-motorized needs receive first consideration for potential multimodal improvement projects.
- Stand-alone pedestrian or bike facility improvements are considered in corridors where needs have been identified as funds become available, with first consideration going to locations of high priority need, and second consideration going to locations of medium priority need.

Transit

Bus service in Covington is provided by King County Metro (Metro) Routes 159 and 168. As a relatively small community that is not designated by PSRC as an urban or regional center, Covington has not

been a regional priority for improved transit service. While the City enjoys proximity to the Auburn and Kent Sounder Stations, direct transit connections are limited to the two routes described above between Covington and Kent Station. Extending rail transit service into Covington is also unlikely in the near term, as the City is not a part of the Central Puget Sound Regional Transit Authority (Sound Transit).

Recent efforts related to the Town Center element of the Downtown Plan, Hawk Property Subarea Plan and the Downtown Design Standards and Guidelines plan for development patterns that would support additional transit service. The concentration of uses in the downtown and pedestrian connectivity of the Town Center create a place where transit options, such as bus, Bus Rapid Transit (BRT), and potentially a rail connector to the regional transit system, could succeed in providing more frequent service and transportation choices to the community for both local and regional travel. Planned new development in the Lakepointe Urban Village Subarea will consist of higher density mixed residential and commercial uses, and the site is being designed to accommodate a park-and-ride lot.

Although transit service is not under Covington's control, the City has established transit LOS standards in the 2015 Comprehensive Plan, summarized in **Error! Reference source not found.** The transit LOS standards provide a means for identifying corridors where the City intends to focus on increased land use densities and amenities to support future transit, and to help facilitate communication with Metro regarding corridors where future transit improvements should be considered.

Exhibit 12 shows the existing bus routes within Covington, and identifies where a need for future transit improvements are anticipated.

As shown on Exhibit 12 the City has identified the following future potential improvements to transit:

High Priority

A new transit route is desired to support planned development in the Town Center area, as documented in the Downtown Plan, which includes mixed residential and commercial uses and pedestrian-oriented streets. The proposed additional transit route would connect the downtown area to other destinations in Covington and beyond Covington Way SE and SE Wax Road.

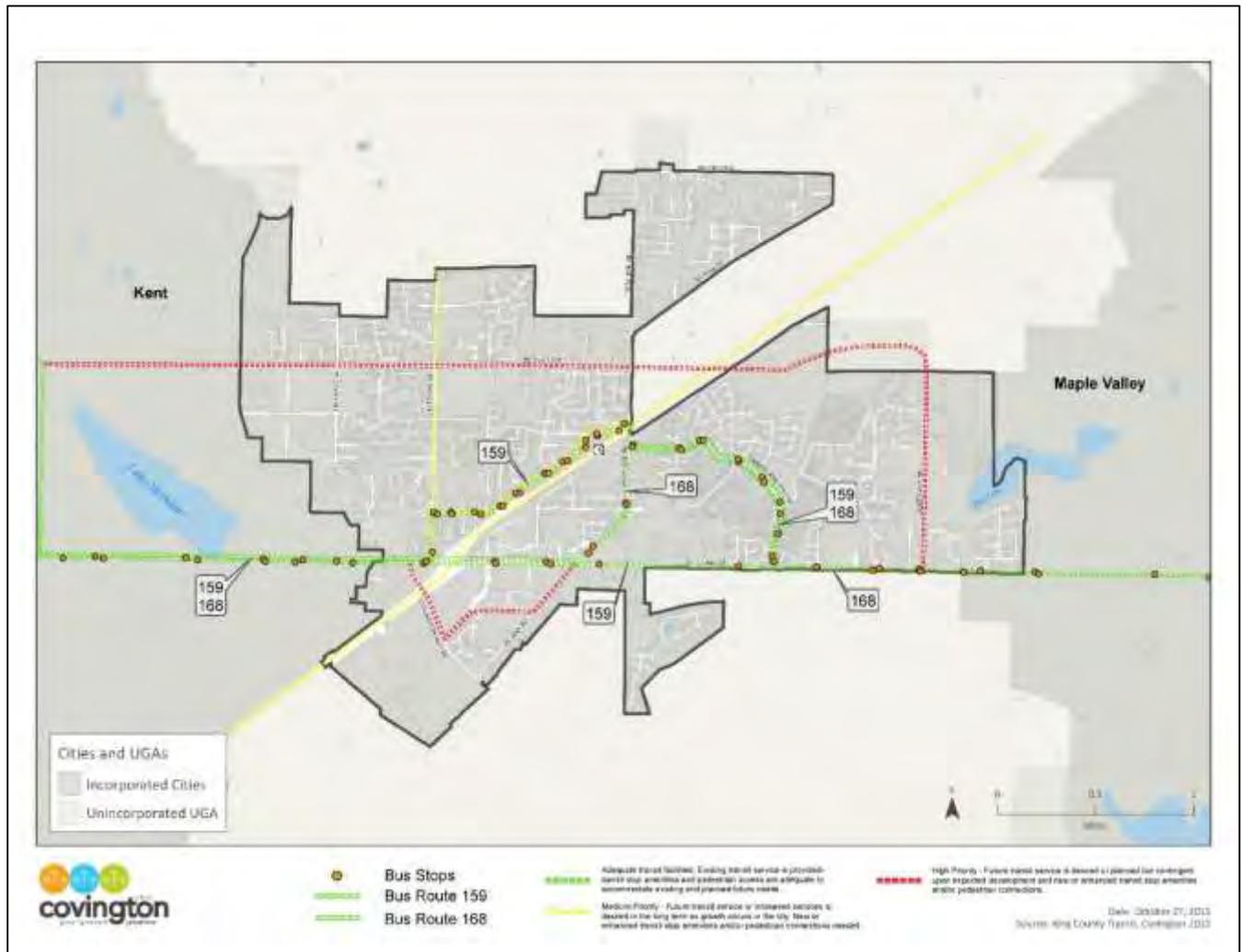
A new transit route is desired to support planned redevelopment at the Lakepointe Urban Village site, located in the northwest area of Covington. The proposed additional transit route would connect the property to other destinations in Covington and beyond via 204th Avenue SE and SE 256th Street. To meet this objective, the City strongly supports a potential future local bus route along SE 256th Street that has been identified by Metro (King County Metro, 2015).

Medium Priority

Increased bus frequencies, transit stop amenities, and pedestrian connections along the existing Route 159 to support existing and planned future land uses and multimodal choices in the downtown vicinity and Lakepointe Urban Village.

Other potential future bus routes identified by Metro (King County Metro, 2015), including an express bus route on SR 18, and an additional local routes on 164th Avenue SE.

Exhibit 12. Covington Transit Corridor and Level of Service Map



Source: City of Covington 2015

Public Services and Capital Facilities

The City of Covington provides capital facilities for municipal buildings, streets, parks and recreation, and stormwater. Other capital facilities are provided by non-city service providers as shown Exhibit 13.

Exhibit 13. Public Service Providers

Public Service	Provider	Relevant Plans and Documents
Municipal Buildings	City of Covington	Public Works Maintenance Facility Study 2013 New City Hall Feasibility Study 2012
Police	King County Sheriff (contracted service)	City Council Police LOS 2007 Resolution (RES 07-42)
Fire and Emergency Services	Kent Regional Fire Authority, Maple Valley Fire District (Mutual Aid)	Kent Fire RFA: Kent Regional Fire Authority Capital Facilities and Equipment Plan, 2014-33
Schools	Kent School District	Kent School District: Kent School District, Capital Facilities Plan, 2015-16
Parks and Recreation	City of Covington	Covington Parks and Recreation, and Open Space (PROS) Plan, 2010
Stormwater	City of Covington	Stormwater: City of Covington 2010 Comprehensive Stormwater Plan and 2015 Stormwater Management Plan
Streets	City of Covington	
Water	Covington Water District, King Co. Water District 111, Ham Water Co.	Covington Water District District: Covington Water System Plan Update, 2007
Sewer	Soos Creek Water and Sewer District	Soos Creek: 2014 Soos Creek Water and Sewer District Sewer Comprehensive Plan; King County Wastewater: King County Regional Wastewater Services Plan, 2013 Comprehensive Review

The proposed Capital Facilities Plan (CFP) Appendix provides a summary of each providers' facilities, LOS demand and planned facilities. Highlights of the analysis show:

Municipal Buildings: If the City wishes to maintain its adopted levels of service for administrative space currently and in the future, additional space will be needed. In the 20-year life of the Comprehensive Plan, it is anticipated that the City would build a City Hall. In the interim, it is likely that the City would lower its LOS until such a plan can be accomplished. The City recently added maintenance space; recommended space needs for City maintenance facilities indicates the City may be able to lower their existing LOS standard.

Police Services: The City meets its adopted service levels for officers as of 2015. In order to maintain current staffing standards, by 2021 the City of Covington Police Department will need to hire additional officers. The City could lower the LOS standard or add officers over time. The space needs for officers would likely be addressed in concert with the evaluation of city hall space needs above.

Fire Protection: Even though the response time standards have improved in the City of Covington, the Kent Fire Department RFA is still not meeting the suburban LOS Standard 90% of the time. Therefore, the Kent Fire Department is currently pursuing fire impact fees in Covington to ensure as growth occurs appropriate facilities are available. The Kent Fire Department's CFP includes building an additional fire station in Covington, which would be better able to serve the southern part of the City. Additionally, Station 75 will be moved further west, and there will be an extension of SE 256th from SR 18 out to 204th Avenue, which should improve response times in eastern Covington.

Schools: Using present student generation rates approximately 780 additional school age students could be added by 2021, and approximately 2,600 school-age students could be added by 2035. The Kent School District has identified capital projects serving Covington area residents and students; some of the improvements would be funded by impact fees.

Parks: The City has a deficit for all facility types based on its present levels of service. As the population is expected to grow by 50% the estimated deficits are anticipated to grow. The City is updating its Parks, Recreation, and Open Space (PROS) Plan to consider appropriate levels of service and capital needs for six and 20-years.

Stormwater: Levels of service for stormwater activities are regulated by the city code and engineering design standards. New development is conditioned to meet water quality, runoff control, and erosion control requirements. The City prepared a stormwater plan in 2010, and established a stormwater utility in 2012 and uses a portion of the customer rate charges to fund capital facilities. A Stormwater Management Plan was completed on March 31, 2015 as part of the City's National Pollutant Discharge Elimination System (NPDES) Phase II permit. These plans have identified facilities, programs, and regulations to help manage stormwater quantity and water quality.

Water: The Covington Water District the District has the capacity to serve its designated service area in the City and UGA. The District has acquired additional water rights in recent years and expects that water consumption rates per residential unit will continue to decline based a greater share of multi-family units being built in the future. The District is in the process of updating their master plan, which was last completed in 2007.

Wastewater: The Soos Creek Water and Sewer District develops and analyzes their own growth projections to ensure the District can accommodate future urban growth within their service area. The District indicates that new growth is partially offset by increases as residences become more efficient. The 2014 Soos Creek Water and Sewer District Sewer Comprehensive Plan identifies numerous capital projects, some of which are located within the City of Covington. All recommended projects belong to one of two categories, pipe replacements/upgrades or lift station replacement/upgrades.

Transportation: This capital facility is addressed in the Transportation Element. A six-year and 20-year capital improvement program is included in the CFP Appendix along with revenue projections; the improvements are designed to meet the City's adopted levels of service.

PROPOSED MEASURES TO REDUCE OR RESPOND TO SUCH DEMAND(S) ARE:

The proposed Comprehensive Plan Update includes a Transportation Element with updated multimodal levels of service and identified projects designed to reduce congestion and improve connectivity and travel by non-motorized and transit modes.

The proposed Comprehensive Plan Update includes a Capital Facilities and Utilities Element and CFP Appendix. The City is establishing levels of service, funding and revenue options, and a land use reassessment policy should levels of service or funding be inadequate.

G. IDENTIFY, IF POSSIBLE, WHETHER THE PROPOSAL MAY CONFLICT WITH LOCAL, STATE, OR FEDERAL LAWS OR REQUIREMENTS FOR THE PROTECTION OF THE ENVIRONMENT.

The Comprehensive Plan Update is designed to meet GMA requirements for a periodic update. See Exhibit 14.

Exhibit 14. GMA Goal Consistency

GMA Goal	Discussion
1) Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.	The City's Comprehensive Plan Update focuses growth in the city limits and assigned UGA. The Capital Facilities and Utilities Element and CFP Appendix are designed to establish levels of service (LOS) for projected growth.
2) Reduce sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.	The City's Comprehensive Plan makes efficient use of land in centers (downtown and Lakepointe) while protecting residential neighborhood character in established neighborhoods.
3) Transportation. Encourage efficient multimodal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans.	The City is planning for multiple modes of travel consistent with the county and Puget Sound Regional Council's plans. New multimodal LOS policies would help prioritize investments in pedestrian, bicycle, and transit facilities.
4) Housing. Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.	The City can meet its housing targets. Housing variety is promoted downtown and in Lakepointe. The City is updating its Housing Element goals and policies based on an updated assessment in the Existing Conditions Report.
5) Economic development. Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.	The City has can meet its employment targets. The City is focusing employment growth downtown and in Lakepointe. An updated Economic Development Element is part of the Comprehensive Plan Update.
6) Property rights. Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.	All properties are given a reasonable use of land, with at least a single family residence allowed.
7) Permits. Applications for both state and local government permits should be processed in a timely and fair manner to ensure predictability.	The City's goal is to streamline the plan and make targeted changes to regulations. The City will continue to implement its permit procedures consistent with RCW 36.70B.
8) Natural resource industries. Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forest lands and productive agricultural lands, and discourage incompatible uses.	The City does not have lands of long-term commercial significance for resources. The mining operation at Lakepointe is ceasing operations consistent with a reclamation plan. The change of the mining use was considered with the Hawk Property Planned Action EIS.
9) Open space and recreation. Retain open space, enhance recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities.	The City will implement its PROS plan, and intends to update it over time.

GMA Goal	Discussion
10) Environment. Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.	The City is amending its Natural Environment Element policies and making targeted regulatory changes following a Best Available Science review and a code audit (respectively The Watershed Company fall 2015, and Parametrix 2015).
11) Citizen participation and coordination. Encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts.	The City has published a schedule of public engagement activities and has had regular meetings with its Planning Commission and City Council.
12) Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.	The Capital Facilities and Utilities Element and CFP Appendix are designed to establish levels of service (LOS) for projected growth.
13) Historic preservation. Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.	The City is updating land use element policies including one that indicates that new development should be sited and designed to protect cultural resources.

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CITY OF COVINGTON ATTACHMENT 2

2015-2035 COMPREHENSIVE PLAN PERIODIC UPDATE

Corrections to Addendum | January 5, 2016

INTRODUCTION

On November 13, 2015, the City of Covington published a Determination of Significance with Adoption of Existing Environmental Documents including an Addendum under the State Environmental Policy Act (SEPA), in accordance with State Environmental Policy Act (SEPA) rules (WAC 197-11-600 and WAC 197-11-630). The Addendum analysis indicates that the Comprehensive Plan Update proposal addressing the 2015-2035 planning period will result in similar impacts as prior Environmental Impact Statements and SEPA determinations. Based on refinements to data included in the Comprehensive Plan Update elements, this document provides minor corrections to the Addendum information that does not change the conclusions of the Addendum.

CORRECTIONS AND CLARIFICATIONS

Amend Exhibit 3 to remove a double count of permits from the pending development 2012 information. The City continues to have a capacity surplus.

Exhibit 3. Targets and Capacity: 2012-2035

Targets and Capacity		Housing	Jobs
Housing Growth Target (2006-2031)		1,470	1,320
Permits 2006-2012 (issued/finaled)	-	163	1,148
Remaining Target 2012-2031	=	1,307	172
Extended Target 2031-2035	+	235	211
Remaining Target 2012-2035	=	1,542	383
Pending Development 2012, updated 2015	+	622	514
Lakepointe Urban Village Capacity	+	1,500	1,889
Parcel Capacity 2012, updated 2015	+	2,164	2,093
Total Capacity	=	4,286	4,496
Capacity Surplus (Deficit) versus Target		2,744	4,113

Source: City of Covington; BERK Consulting 2015

Amend Exhibit 4 to correct the residential capacity to match Exhibit 3. The relationship of targets, market analysis and capacity remain similar.

Exhibit 4. Growth Targets, Market Demand, Land Capacity



Source: BERK Consulting 2015

Amend Exhibit 7 regarding 2012 levels of service for concurrency intersections to correct a name and add other existing roundabouts. There are no changes in overall conclusions regarding level of service compliance.

Exhibit 7. Existing (2012) Level of Service at City Concurrency Intersections – PM Peak Hour

ID	Intersection	Standard	LOS ¹	Delay ²
Signalized				
4	SE 251 st St/164 th Ave SE	D	A	6.9
7	SE 256 th St/156 th Ave SE	D	A	7.6
9	SE 256 th St/168 th PI SE	D	A	8.7
11	SE 256 th St/180 th Ave SE	D	C	37.0
14	SE 262 nd St/180 th Ave SE	D	B	12.4
21	SE 272 nd St (SR 516)/Covington Way	UC ³	E	56.6
22	SE 272 nd St (SR 516)/164 th Ave SE	UC ³	D	37.5
23	SE 272 nd St (SR 516)/Westbound SR 18 Ramps	UC ³	C	28.1
24	SE 272 nd St (SR 516)/Eastbound SR 18 Ramps	UC ³	D	36.9
26	SE 272 nd St (SR 516)/168 th Ave SE	UC ³	C	25.1
29	SE 272 nd St (SR 516)/172 nd Ave SE	UC ³	C	32.7
32	SE 272 nd St (SR 516)/SE Wax Rd	UC ³	D	43.2
34	SE 272 nd St (SR 516)/192 nd Ave SE	D	B	14.8
40	Covington Way/SE Wax Rd	D	C	21.0

ID	Intersection	Standard	LOS ¹	Delay ²
43	SE 270 th Pl/SE Wax Rd	D	B	16.6
57	SE 272 nd St (SR 516)/185 th Ave SE	D	C	25.7
59	165 th Pl SE/Covington Way	D	B	18.4
233	Kentwood High School Hwy/164 th Ave SE Roundabout	D	A ⁴	<10.0 ⁴
8	SE 256 th St/164 th Ave SE	D	B	10.9
17	SE 267 th Place/SE Wax Rd/180 th Ave SE	D	A	7.4
44	SE 270 th Place/172 nd Ave SE	D	A	5.8
83	Fred Meyer/Covington Square/168 th Ave SE	D	A	7.2
128	Costco/SE 276 th St/168 th Ave SE	D	A	6.2
	All-Way Stop-Control			
2	SE 240 th St/196 th Ave SE	D	B	12.7
5	SE Wax Rd/ 180 th Ave SE	D	B	13.2
15	SE Timberlane Boulevard/Timberlane Way SE	D	B	10.3
19	SE 267 th St/Timberlane Way SE	D	B	10.6

1. LOS = Level of Service
2. Delay = Average delay for all vehicles through the intersection in seconds per vehicle
3. UC = Ultimate Capacity provided on SE 272nd Street (SR 516); operation worse than LOS D acceptable.
4. Existing data is not available for this intersection, but existing level of service (LOS) is estimated based upon future conditions analysis completed at this intersection, which projects LOS A operation through 2035.

Sources: David Evans and Associates and Heffron Transportation 2015

Amend Exhibit 8 to show slightly lower delay for an intersection, with similar resulting conclusions:

Exhibit 8. Street Improvement Projects to Meet Concurrency

ID	Intersection	Improvement	LOS Standard	Unmitigated		With Mitigation	
				LOS ¹	Delay ²	LOS ¹	Delay ²
Stop-Controlled							
2	SE 240 th St/ 196 th Ave SE	Add eastbound left-turn lane	D	E	38.8	D	34.1
5	SE Wax Rd/ 180 th Ave SE	Add northbound right-turn lane or signalize	D	E	37.0	C	21.1
Signalized							
11	SE 256 th St/ 180 th Ave SE	Address through design of Capital Improvement Program (CIP) project #1056/1149	D	E	57.9	(1)	(1)
40	Covington Way/ SE Wax Rd	Add southbound left-turn lane	D	E	71.8	C	25.2

1. Determined through design of Capital Improvement Program (CIP) project # 1056/1149
- Sources: David Evans and Associates and Heffron Transportation 2015

**CITY OF COVINGTON
Planning Commission Minutes**

November 19, 2015

City Hall Council Chambers

CALL TO ORDER

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

MEMBERS PRESENT

Bill Judd, Jim Langehough, Paul Max, Krista Bates and Alex White

MEMBERS ABSENT Jennifer Gilbert-Smith and Chele Dimmett

STAFF PRESENT

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

APPROVAL OF CONSENT AGENDA

- **1. Commissioner White moved and Commissioner Bates seconded to approve the November 5, 2015 minutes and consent agenda. Motion carried 5-0.**

CITIZEN COMMENTS-None

UNFINISHED BUSINESS

PUBLIC HEARING

2. Public Hearing, Discussion and Action on the 2015 Comprehensive Plan

Chair Judd opened the Public Hearing.

Community Development Director Richard Hart gave a brief overview of the public outreach efforts and background information of the Comprehensive Plan. He noted public comments received from two individuals had been distributed to the Planning Commission. The City Council will also hold a Public Hearing on January 12, 2016.

Cliff Page – 17230 SE 267th Place – He shared his concern that there are contaminants in the storm water runoff in the Burwood area into Soos Creek. He would like to see efforts to contain this.

Nicholas Skok – lives outside city limits. He would like to address light rail in the transportation element of the Comprehensive Plan. He also emailed comments that have been distributed to the Planning Commission. He feels that the needs of this area are underserved by mass transit and would like sound transit to have an open house in the community.

- **Commissioner White moved and Vice-Chair Max seconded to recommend approval of the draft 2015 Comprehensive Plan Periodic Update to the City Council, insubstantial form. The motion carried 5-0.**

Senior Planner Ann Mueller addressed Mr. Skok's concerns regarding light rail. She explained that the City is not a part of the regional transit authority. The City Council passed by resolution to not be a part of the regional transit authority. Councilmember Mhoon sits on a regional transportation board. Mr. Hart shared the fact that the city recognizes the need, but Sound Transit will not hold an open house for us because we are not part of their organization. Covington works with Metro bus service. We are discussing bus rapid transit with other local cities. We have tried to expand and modify existing services to serve the community.

Vice Chair Max would like to see transit to Green River Community College.

The right-turn lane from SE 272nd onto Covington Way is in the 6 year Capital Improvement Program (CIP). The cost is \$13,000,000 partly due to major environmental work. The City Council recognizes that turn lanes would move traffic better through the community. When projects are multi-million dollars, a city of this size cannot afford them. It is costing \$12,000,000 to finish SE 272nd from Jenkins Creek to 184th. Mr. Hart explained how money can be raised for roadway improvements. The Transportation Benefit District (TBD) has been defeated by the voters twice. The City Council issued bonds to make major improvements to arterial roadways. We are paying off those bonds with sales tax revenue. When a project comes in and creates additional impact, fees are collected to mitigate the impact.

NEW BUSINESS - None

ATTENDANCE VOTE

- **Commissioner Langehough moved and Commissioner White seconded to excuse the absence of Commissioner Gilbert-Smith and Commissioner Dimmett. Motion carried 5-0.**

PUBLIC COMMENTS - None

COMMENTS AND COMMUNICATIONS FROM STAFF

Ms. Mueller shared that there is a study session on the Comprehensive Plan with the City Council next Tuesday, November 24, 2015 at 6:00 p.m. Annexation documents for the Hawk Subarea Plan have been submitted to county.

Mr. Hart mentioned the 184 page document that was submitted to the Planning Commission as public comment on the Comprehensive Plan Update and summarized the two points regarding environmental concerns and transparent public process. We have exceeded the minimum legal requirements trying to reach as many businesses as we could.

Chair Judd asked for a copy of the City's Mission and Vision Statement.

ADJOURN

The November 19, 2015 Planning Commission Meeting adjourned at 7:15 p.m.

Respectfully submitted,

Kelly Thompson, Planning Commission Secretary

**Responses to Comments on Comprehensive Plan Update
Public Hearing, November 19, 2015**

Response to comment about the need for a right-turn lane from 272nd to Covington Sawyer:
The City's 6-year Transportation Improvement Program (TIP) includes a project to improve this intersection within the next six years. While the water district has deeded the land necessary to allow for a right-turn lane to the city, construction funds are not yet available. The Transportation Element of the draft Comprehensive Plan acknowledges the traffic deficiencies on 272nd, the need to improve traffic operations, and the funding challenges (Draft Comprehensive Plan, pages T-17 and T-26). Policy TR-4 specifically identifies adopting a 6 year TIP that addresses concurrency needs as a city policy.

Response to comment about expansion of the regional light rail network to Covington:
Planning and implementation of the light rail network is the responsibility of the Central Puget Sound Regional Transit Authority (RTA). The City Council has chosen not to increase their taxes to become a member of the RTA. Consequently, Sound Transit does not include the City of Covington in its planning for light rail service. Further, in two different elections during the past three years, the citizens of Covington have chosen not to increase their taxes to pay for street and ROW improvements. However, the city continues to work with King County Metro to improve bus service for Covington and in particular, access to Sounder service in Kent and future light rail stations in locations outside the city limits. The City also was part of a Tri-city feasibility study about two years ago to provide Diesel Motorized Units (DMU's) between Maple Valley, Black Diamond and Covington and the Sounder Station in Auburn. That study found the density of development, ridership, and costs of such service were not feasible. The draft Comprehensive Plan contains the commitment to coordinate with Metro for additional transit routes and facilities (draft Comprehensive Plan, page T-25) as well as Goal TR-V and Policy TR-26.

Response to comment on the need for improved storm water drainage in the Burwood Subdivision:

Small storm water drainage upgrades from existing open ditch drainage systems along the ROW of streets are handled through the annual public works budget for street improvements, based upon availability of funds. This area of the Burwood Subdivision has not been identified as a high priority in relation to other street ROW improvements, and limited funds are available for such improvements city-wide. The draft Comprehensive Plan does contain a commitment to improve storm water drainage in residential neighborhoods depending upon resource availability.

Response to comment on Agenda 21, lack of public notice, and lack of concern for environment and sustainability:

Agenda 21 is an international 700 page global plan of action aimed at improving the environment & economies for all peoples of the planet through sustainability, which resulted from a UN Conference on the Environment & Development called the Earth Summit in 1992 in Brazil. While the issue of sustainability does relate to Covington's Comprehensive Plan and our draft 2016 Plan does have policies and action programs for sustainability, the major components of Agenda 21 relate to actions at the federal and international level. The public notice and outreach efforts taken during our entire Comprehensive Plan process have always met and exceeded the legal requirements. Every time there has been a public meeting or forum on the Comprehensive Plan, the City has gone beyond minimal legal requirements and used other public involvement and notice methods to encourage broad participation from all types of stakeholders and interest groups.

ATTACHMENT 5

On November 18, 2015- Grazyna Prouty, a resident of Kent (12609 SE 212th Pl., Kent, WA 98031) submitted a 184 page document as written comment on the Comprehensive Plan and SEPA determination. This document was provided electronically to the Planning Commission and City Council and is available for public review upon request at city hall.

Ann Mueller

From: nicholas skok <nkok2005@yahoo.com>
Sent: Friday, December 11, 2015 12:21 PM
To: Ann Mueller
Cc: Richard Hart; Salina Lyons; Kelly Thompson
Subject: Re: Comprehensive Plan/ Open House

To Planning Commission,

I was disappointed at the result of the most recent comprehensive planning meeting in regards to my topic of gaining better transportation options for the city. Instead of using the time to direct questions towards myself and form a discussion that could better equip members with potentially new information or answer concerns, I was given a response on the basis of multiple disputable points. Without having the chance to respond to Richard's response or given more time to elaborate - that was readily available for discussion as only a handful of citizen participants were present and I was the last volunteer speaker- I'll expand on those points briefly.

Covington Voted Against Sound Transit Inclusion

I believe the vote occurred in the late nineties per Richard's response. The increase in population, traffic, and commercial businesses since that time is or should be well known. The climate for pro-transit measures is higher than ever as seen by multiple examples including Sound Transit announcing this week they're considering 15, 20, and 25yr funding packages for Rail and Rapid Bus expansion. Using a vote that took place years before our current conditions to justify decisions that will affect the city for the next 20yrs is counterintuitive.

Covington Has Bus Route That Serves Kent Station

Contrary to Richard's response, Kent Station doesn't have nor will it have Link Light Rail. A station is being planned on the outskirts of Kent near I5. Adjusting or addressing the need for bus routes to this station haven't been brought up as far as I know. We've seen Seattle Metro and Sound Transit recently reshape their routes to better serve new stations in Capitol Hill and the University District that will open in March. The "Move Seattle" legislation was also heavily approved last month that reflects improved transit access and the pro-transportation climate for voters.

Covington Would Pay Back-Taxes to Join Sound Transit

I don't specifically know the details about the arrangement but I fail to see how a deal couldn't be addressed one way or the other. Per Richard's response, "we have a lobbyist" whom I suspect is great at negotiating favorable outcomes. As legislation and funding is being discussed right now for ST3, it would be wrong to assume options aren't on the table.

Covington Planners Already Worked Hard on the Plan

While I appreciated the effort explained to me about the previous work put into gaining social awareness and feedback from local citizens towards the formulation of the long term plan, it should also be appreciated that another voice was heard from the population and gave critical analysis while also presenting options to consider implementing in the plan.

Right-Hand Turn Lane is State's Responsibility

While 272nd may indeed fall under specific State funding obligation's, it's also counterproductive to make that the focal point for not expanding efforts to either fund or properly address a solution. The response given didn't address any lobbyist efforts if they exist or a timetable for further project analysis if needed due to the newly developed lift station, though a price tag of \$13 million was given. What options have been discussed or are moving forward? Off the top of my head, funding the project locally and getting State reimbursements seems plausible. Could a lane be added on the opposite side, across the street, while converting the already existing lane near the lift station into the right-hand-turn-lane?

Tax Revenue in Covington is Limited

With the new additions of the retirement and low income housing communities adding people to the city, commercial and sales tax revenue will increase. Designs for the city center expansion as I read it, would also add \$16 million dollars of additional annual revenue. With transportation and traffic as both the immediate concerns of the city officials and its populous, these funds should be planned to adequately update the city's traffic infrastructure as they've lagged for one reason or another, during a period of added commercial and citizenship growth. Would you agree with the assessment that planning or more specifically the development in the transportation sector in Covington has not kept up with growth?

Transportation/Right Hand Turn Lane is Expensive Expenditure

People have to stop looking at upgrading transportation infrastructure as expenditures and acknowledge them as an investment. How are you quantifying the amount of time and subsequently money lost in traffic from, among other points, higher gas bills versus the amount to improve driving conditions?

Covington Voters Don't Want New Taxes

While this was included in the response from Richard and concluded that this point could be argued for various reasons and shouldn't be addressed further, I'd have to respectfully disagree. Constant debate helps shape conditions most pressing to the public. As stated above: a vote for transportation upgrades from multiple revenue sources including but not limited to new taxes reflects the current voter climate while exclusion from Sound Transit specifically is outdated and should be readdressed on the condition of attractive returns from such involvement.

Beyond that, to my knowledge no temporary tax option was offered to voters, though I'm not familiar with every single past Covington vote. Distrust for temporary taxes that have traditionally been extended or continued for indefinite terms throughout this state which in turn has left little trust with citizens. Guaranteeing tax breaks after upgrades are completed could freshen the outlook on skeptics.

Direct Bus Route to GRCC

I did appreciate the gentleman's proposal to incorporate a direct bus route to GRCC at the meeting. I remember when I attended GRCC, the frustration with parking and the lack of additional options readily available, outside of somehow parking in a commercial lot in town, hopping on a bus, then transferring busses to arrive to class. It would be fair to expand on this proposal further to address all faucets of potential riders including students at both high school campuses Kentlake and Kentwood, and students of college age who don't attend high school. Giving the numerous domestic and foreign exchange students who live on campus at GRCC, improving their options to shop locally at Costco or other stores within city limits only increases the value to this proposal.

No government, government agency, or person is perfect. The long-term plan that has been put forth isn't perfect either, though comprehensive in detail. The road upgrades on 272nd planned to continue up to the Home

Depot area, along with the “Covington Connector” are the byproducts of local state legislatures that helped form a statewide transportation package who happen to reside in and/or represent the area. The project’s themselves could’ve served the community ten years ago and don’t solve the issues today or twenty years down the line, which is what the comprehensive plan is supposed to address.

It’s time to stop playing catch-up and get ahead of the curve. If you have a lobbyist, get him to lobby for more favorable action to occur now; if he can’t, find someone who can. Start or continue dialogue with appropriate parties, including officials from neighboring towns like Maple Valley City Council member Dana Parnello- a pro-transportation member, or Dow Constantine, Joe Fain, Pat Sullivan, Joe McDermott, Lynn Peterson, Larry Phillips and Dave Upthegrove. And if you think any part of this sounds too wishful or too hard or if you want to disregard this email as nothing more than banter, you should consider another job or hobby for your spare time.

We all read the newspapers, check the sites and see what’s going on in our state. Every other major city the region is standing up and demanding their dollar go further, their commute get shorter, and asking for a seat at the table so their constituents and citizens can get a piece of the pie. Today that pie represents the Link; it represents logical upgrades to improve our commute times, and it represents more options on the road and less time in our car away from our family, and our jobs that provide for our loved ones. I urge you to do the same- and if you can’t, if you really can’t, then make plan B so good that we can forget about getting left off of ST3 for the next 25yrs and ease our frustrations about Costco shoppers and/or citizens commuting from Kent to Maple Valley and Auburn, that come to our town and continually impact our roads.

Candidly,

Nicholas Skok

On Nov 16, 2015, at 9:34 AM, Ann Mueller <amueller@covingtonwa.gov> wrote:

Dear Mr. Skok,

Thank you for taking the time to review our draft 2015 Comprehensive Plan Periodic Update documents and provide the city comments. I will provide a copy of your email to the Planning Commission at their public hearing for them to consider in their deliberation this Thursday. Please note that the City Council is tentatively expected to hold a public hearing on the 2015 Comprehensive Plan Periodic Update on January 12, 2015. If you would provide me your mailing address I can add you as a party of record to receive notification of that public hearing.

Regards,

Ann

Ann Mueller, AICP, Senior Planner
City of Covington
Hours: Mon, Tue & Wed 9am- 4:30pm
(253) 480-2444(direct)
amueller@covingtonwa.gov

www.covingtonwa.gov/Update2015
www.facebook.com/CityofCovington

<image001.png>

From: nicholas skok [<mailto:nskok2005@yahoo.com>]

Sent: Friday, November 13, 2015 5:27 PM

To: Richard Hart <rhart@covingtonwa.gov>

Cc: Ann Mueller <amueller@covingtonwa.gov>

Subject: Comprehensive Plan/ Open House

To Ann and Richard,

As I may most likely be out of town on business next week during the open house I wanted to bring up two transportation issues that I'd like to see addressed in the comprehensive plan.

1. The first issue was not mentioned in any part of the plan whatsoever and I'm a bit shocked. If this has indeed escaped you I'm happy that I'm the one to bring awareness to the issue. Simply put, we need a right-turn lane from 272nd to Covington Sawyer. With the influx in traffic from people who are trying to either go to Costco or who live up Covington Sawyer towards Druids Glen, they're both stuck behind cars in the current lane that want to turn right, and in the way of cars that want to go straight into Covington.

As this is the entrance to the City of Covington from Kent and a major point of traffic, especially during rush hour, I'm surprised that this hasn't been discussed or already upgraded by now. There's currently commercial real estate being developed along the side of the road there and an improved traffic path would not only be more efficient, but safer for drivers. I've brought this concern up to all three representatives of our district including Rep. Hargrove, Senator Fain, and Rep Sullivan, as well as Don Vondran as he was the point man during recent construction.

During all of the road work in that specific area over the last year and all the equipment in place for road construction, I was surprised no road improvements were made as it's a common sense fix. This on top of the fact that there was all that extra time added to the commute times for residents in the area, yet they got nothing to show for it in the way of something like a turn-lane or improved conditions. I understand that this sewage work was a part of a separate project not related to road development but the foresight was lost here I think. This lane needs to be added. It will cut down commute times for Covington residents entering the city, residents who live up the road on Covington Sawyer, shoppers from surrounding areas, and Maple Valley residents who cut through on 272nd. Simple fix. Needs to be addressed.

2. The second issue was slightly addressed in the comprehensive plan. It brought to light the awareness of creating a route for potential light rail expansion. Two points need to be agreed to when discussing this possibility:

a) This is time sensitive. ST3 is being formulated and planned now for legislation for 2016. If Covington, (and Auburn, Maple Valley, presumably connecting points) doesn't get a station to be researched and potentially developed on that piece of legislation that will ask for up to \$15 billion dollars, we will miss our chance for the next 20 years as that's how long the perceived development of the plan will last. And isn't the next 20 years the focal point of our comprehensive plan? More needs to be done to contact Sound Transit and become a part of the Central Puget Sound Regional Transit Authority if that's what it takes. This is a huge opportunity for our town to have the option to have a dependable and safe commute to work, for students to have a safe and easy option to get to campus, and to take cars off the road for those of us who prefer to drive.

b) Mentioned in the plan was the option to have a “town center” built either around or near a potential rail stop. While this is a good option, I’ve specifically talked to planners on the Sound Transit team and they’re turned off by these models for stations. While this doesn’t mean this can’t be or shouldn’t be developed, it should be noted and agreed to that a number of stations already in service and being developed are no more than an evolved Park & Ride station. This can also be a great option and should be thought of as a leading model for future development as a plethora of parking will indeed be sought after- spaces that wouldn’t be infringed on by would-be shoppers in a town center model. A great example of a P&R is the one on Mercer Island. They’ve created a second level of parking underground to add space and limit an eye sore of what would be a parking garage installation. Safety and security is well maintained and a non issue there so it shouldn’t be one here in that instance.

The point I really want to drive home here is that getting a Sound Transit station is a very real possibility but the action would need to be taken now before the final list of projects is made. ST3 will have one final round of appeals and feedback and the opinion’s of yourself and our city council would make a difference I think. A vote or a request for feedback in the Covington Reporter and/or your website and Facebook may also help you gather local support. Clearly, the entire region is being connected and only Covington, Auburn, Maple Valley and parts of Kent are being the one’s left out. As we’re going to be paying taxes, sitting in the same traffic as everyone else, and a huge part of this county that always seems to be forgotten, I hope you’ll raise your hands and not let them dismiss us. Our commutes matter too, as we drive a long way to Seattle, Bellevue, and Tacoma.

I’ve attached a photo of the light rail stations in service with stations that may also be developed. I’ve added a line showing a possibility of how/where we’d be connected. Ideally, a stop would be made connecting Covington with GRCC for all the students from our city that commute to campus. With their construction and development it shouldn’t be hard, logistically speaking. Beyond GRCC a stop either at or also at Auburn Station and the old Super Mall, with it finally connecting to “the spine” in Federal Way or the future Kent stop, Covington residents could get to and from Seattle, Tacoma and the airport with ease. Moving east it can connect along Highway 18 in Maple Valley near their P&R. Continuing on, moving either east up to the planned Issaquah stop that connects to Bellevue or to the proposed Renton station that would also connect to Bellevue would also be ideal.

I look forward to hearing from you. Thank you for fighting the good fight. I hope I helped your efforts.

Candidly,

Nick Skok

<image002.jpg>



STATE OF WASHINGTON

DEPARTMENT OF COMMERCE

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December 14, 2015

Ms. Ann Mueller
Senior Planner
City of Covington Community Development
16720 Southeast 271st Street Suite 100
Covington, Washington 98042

RE: Proposed 2015 comprehensive plan update

Dear Ms. Mueller:

Thank you for sending Growth Management Services the proposed amendments to the City of Covington's comprehensive plan that we received on October 29, 2015, and processed with Material ID No. 21799. We have reviewed the submitted materials and offer the following comments for your consideration:

We especially like the following:

- The plan is well organized and is user-friendly. The framework goals included in the introduction chapter set the tone of the plan and subsequent plan elements.
- The plan acknowledges the importance of coordinated planning efforts, both at the regional scale and with adjacent jurisdictions.
- The plan further acknowledges there is adequate capacity to meet the projected population and employment growth.
- The city prepared a market study to demonstrate that it can accommodate the projected growth targets but also shows there is room for additional capacity within the 20 year planning horizon, should growth occur at a faster rate. We recognize that the City will monitor this over the next few years and can reassess this in annual amendments or with the next periodic update if any modifications are needed.
- The city has identified locations, such as the Lakepointe Urban Village and Town Center, for future growth and is planning for a mix of land uses at higher intensities than exist in the existing, primarily single family residential neighborhoods. The outcome will be a broader range of housing options, including more moderate and high density multi-family options. This will increase choice in housing types and promote greater housing affordability, while maintaining the character of existing neighborhoods.

Ms. Ann Mueller
December 14, 2015
Page 2

- The Transportation Element includes goals and policies designed to increase the ability of pedestrians, bicyclists, and transit users to meet their mobility needs, and promote non-motorized forms of travel, while still accommodating vehicular traffic. We commend the city for identifying and prioritizing pedestrian and bicycle improvements.

We have a suggestion for strengthening your plan amendments that we encourage you to modify before adopting the amendments:

We suggest the city add a policy to ensure budget decisions are consistent with the comprehensive plan. You may want to consider adding such language to Policy CF-26.

We have a suggestion for strengthening your plan amendments that we encourage you to consider either in these or future amendments:

The plan shows a funding gap of approximately \$78 million over the 20-year planning horizon. While the Capital Facilities Appendix includes a discussion of potential strategies to help overcome that gap, and the comprehensive plan itself includes a policy to reassess the land use element if there is a funding shortfall, we strongly encourage the city to develop a strategy to meet these financial needs identified in the plan.

Congratulations to you and your staff for the good work these amendments represent. If you have any questions or concerns about our comments or any other growth management issues, please contact me at joyce.phillips@commerce.wa.gov or 360.725.3045. We extend our continued support to the City of Covington in achieving the goals of growth management.

Sincerely,



Joyce Phillips, AICP
Growth Management Planner
Growth Management Services

JMP:lw

cc: Richard Hart, Community Development Director, City of Covington
Jeffrey S. Wilson, AICP, Senior Managing Director, Growth Management Services
David Andersen, AICP, Eastern Region Manager, Growth Management Services
Ike Nwankwo, Western Region Manager, Growth Management Services
Michael Hubner, Principal Planner, Puget Sound Regional Council
Yorik Stevens-Wajda, Associate Planner, Puget Sound Regional Council

December 1, 2015

Richard Hart, Director
 Department of Community Development
 City of Covington
 16720 SE 271st St.
 Covington, WA 98042

Subject: PSRC Comments on Draft Covington Comprehensive Plan Update

Dear Mr. Hart,

Thank you for providing an opportunity for the Puget Sound Regional Council (PSRC) to review a draft of the City of Covington 2015 Comprehensive Plan update. We recognize the substantial amount of time and effort invested in this plan, and appreciate the chance to review it while in draft form. This timely collaboration helps to ensure certification requirements are adequately addressed and certification action can be taken by PSRC boards after adoption.

We would like to note the many outstanding aspects of the draft plan. Several particularly noteworthy aspects include:

- The plan overall is well-organized and highly readable. Action plans, which are included at the end of each plan element, point toward the city’s near- and long-term work plan and capital investments.
- The plan includes an optional natural environment element, which includes strong policies that promote water quality, hydrologic function, and related habitat. Policies NE-15 to 22 notably promote low-impact development and best practices in stormwater management. Also notable are Policies NE-11 and 12, along with CF-42 and 43, which address public and private energy efficiency as a means to reduce greenhouse gas emissions.
- The land use element encourages compact development in central places within the city: the Town Center and the Lakepointe development. Policies and actions for those planning areas promote mixed-use development and transit-supportive densities and design.
- An economic development element sets clear goals, policies, and actionable strategies intended to diversify the local economy, especially focused on bolstering local capture of the health care sector employment growth, and through opportunities for new employment centers in the Downtown and Lakepointe areas.
- The transportation element includes clear mapping and prioritization of transportation investments based on a layered network approach. Policies TR-17 to 22 promote non-motorized transportation options in key locations and corridors in the city.

The draft comprehensive plan advances regional policy in many important ways. There are some items, however, that should be addressed before the plan is finalized:

PSRC Comment	City Response
<ul style="list-style-type: none"> • VISION 2040 calls for local plans to include a context statement that describes how the comprehensive plan addresses regional policies and provisions adopted in VISION 2040. While the draft plan broadly addresses, 	See pages LU-24 and LU-25 for a statement of consistency which is similar in level of

PSRC Comment	City Response
<p>both in the introduction and in the land use element, consistency with VISION 2040, the city should more explicitly describe how the plan addresses the Multicounty Planning Policies and Regional Growth Strategy in VISION 2040. Examples of context statements are provided in PSRC’s Plan Review Manual, page 2-1.</p>	<p>detail and form as the example referenced.</p>
<ul style="list-style-type: none"> One key criterion for regional certification of local comprehensive plans is alignment with the Regional Growth Strategy and with growth targets adopted by each county. The draft Covington comprehensive plan is based on growth assumptions for the 20-year planning period that significantly exceed the adopted housing and employment growth targets for the city. We address this issue in more detail, including guidance on documentation, policies, and actions, in a separate letter to the city dated November 30. 	<p>See responses on the separate letter.</p>
<ul style="list-style-type: none"> VISION 2040 (see MPP-DP-1) promotes a framework to ensure the “long term stability and sustainability of the urban growth area” (UGA). MPP-G-1 calls for coordinated planning among agencies around issues of regional significance. The draft comprehensive plan (see Policy LU-19) supports expansion of the urban growth area adjacent to the City of Covington. As guided by VISION 2040, the city should consider revising the plan to clarify the city’s intention to pursue any UGA changes in coordination with King County and within a common framework and criteria established by the countywide planning policies. Given Covington’s status as a Small City in the Regional Growth Strategy, and regional efforts to preserve the rural area, the city should alternatively consider removing Policy LU-19 altogether. 	<p>Comment noted. The qualities of the subject area were studied in the Northern Gateway Study in 2012. The City in the past has coordinated with King County on the appropriate process, and intends to continue that effort. A revised policy is under consideration as follows:</p> <p>Policy LU-19. Continue to support the expansion of the city’s urban growth area in the northern gateway to the city to include land east of 180th Ave SE between SE Wax Road and SR 18. <u>Pursue changes to the urban growth area based on criteria in the countywide planning policies and in coordination with King County.</u></p>
<ul style="list-style-type: none"> The housing element addresses broadly many facets of future housing need. Existing conditions data provides a rich basis for policies and actions to address those needs. Particularly strong are policies encouraging a range of housing types, commitment to regional coordination, and a focus on meeting the needs of seniors and people with disabilities. The housing needs assessment shows gaps 	<p>Housing needs are summarized on pages H-3 and H-7 based on the Existing Conditions Report (which will be adopted by reference with the Plan Update). The “Housing Plan” identifies</p>

PSRC Comment	City Response
<p>between the existing housing stock and current and future demand for affordable housing, including housing that meets the needs of the local workforce as well as the affordable housing goals in the King County CPPs. The housing element should highlight the identified needs and address specific steps to meet that need in policies and in the action plan. The PSRC site http://www.psrc.org/growth/housing/ and ARCH provide information about potential actions, such as new regulatory tools and incentives, public investments, and partnerships, to address support for affordable housing called for in Policies HO-11 to 17.</p>	<p>ways in which the City intends to meet local needs are highlighted on pages H-9 through H-12. The Draft Element is being further amended to add a subsection on implementation of recent tools adopted by the City such as the Multifamily Tax Exemption and Development Agreements with developers of affordable housing (applied with a Downtown mixed use project in 2014).</p>
<ul style="list-style-type: none"> The PSRC Plan Review Manual calls for the transportation element of local plans to “focus system improvements to support existing and planned development as allocated by the Regional Growth Strategy,” and also to “demonstrate that travel demand forecasts and transportation need assessments are always based on land use assumptions that correspond with the most recently adopted growth targets.” The draft plan lacks detail on land use assumptions used as a basis for forecasting future transportation needs. The city should add information on the total amount of population, housing, and employment growth assumed during the 20-year planning period and explain how it relates to the land use element, future growth areas within the city, and adopted growth targets. 	<p>1) The market study growth – documented on page LU-8 – is what was used in the transportation plan. Page LU-8 indicates the City’s Comprehensive Plan uses the market demand study in order to plan for capital facilities, utilities, and services. Amendments are proposed to the Draft Plan to add “transportation” to that list.</p> <p>2) The City’s transportation model assumes regional growth plan assumptions outside the city limits; this will be clarified in amendments to the Draft Plan. See responses on growth targets under separate cover illustrating:</p> <ul style="list-style-type: none"> the efficient land use plan that the City has created, the City’s significant progress on its growth target, the pending pipeline development at the start of the plan that show targets are already met for jobs and half met for homes, and

PSRC Comment	City Response
	growth targets are a floor, not a ceiling (Davidson Serles, 09-3-0007c, FDO 10/5/2009, at 11).
<ul style="list-style-type: none"> • The Growth Management Act (RCW 36.70A.070(6)) requires that local comprehensive plans include a multiyear transportation financing plan for how the jurisdiction will meet the mobility needs identified for the planning period. The financing plan should include a list of investments to meet transportation needs over the planning period, estimated costs for those investments, estimated probable revenues available to the local jurisdiction, and a reassessment strategy in the event revenues fall short of costs. While the transportation element and capital facilities element and appendix address many aspects of the financing plan, the plan would more clearly address the GMA requirements with the following: 	The Capital Facilities Plan Appendix contains a multi-year plan – see responses below for more information.
<ul style="list-style-type: none"> ○ Provide a complete transportation project list for the 20-year planning period 	Please see the Capital Facilities Appendix, Exhibit 45. Six-year Transportation Capital Improvement Program. The exhibit shows projects both in the 2016-2021 period and the 2022-2035 period. Thus the title of the Exhibit will be amended to say: Exhibit 45. Six-year <u>and 20-year</u> Transportation Capital Improvement Program.
<ul style="list-style-type: none"> ○ Provide preliminary cost estimates for roadway, pedestrian, and bicycle improvements identified through the 2035 plan horizon 	See the CFP appendix (Exhibit 45) for transportation costs at the 6 and 20 year periods. Descriptions of projects will be added to show the multimodal nature of several transportation projects. Please also see the projected parks projects list that includes trails.
<ul style="list-style-type: none"> ○ Summarize the forecast of probable funding resources for transportation through the 2035 plan horizon 	See the Capital Facilities Appendix where revenues are projected including REET, transportation impact fees,
<ul style="list-style-type: none"> ○ Identify whether funding resources are sufficient to meet estimated costs of identified improvements 	

PSRC Comment	City Response
<p>Further guidance on how to address the financial analysis in the plan can be found in the Department of Commerce's Transportation Element Guidebook, pages 202 through 212.</p>	<p>grants, and other historic and future funding options. Note that the City recently passed an annual vehicle licensing fee that was recommended as an option and the Appendix is being updated.</p>

PSRC has resources available to assist the city in addressing these comments. We have provided links to online documents in this letter, and additional resources related to the plan review process can also be found at <http://www.psrc.org/growth/planreview/resources/>.

Thank you again for working with us through the plan review process. There is a lot of excellent work in the draft and we are available to continue to provide assistance and additional reviews as the plan moves through the development process. If you have questions or need additional information, please contact me at 206-971-3289 or mhubner@psrc.org.

Sincerely,



Michael Hubner, AICP
Principal Planner
Growth Management Planning

cc: Review Team, Growth Management Services, Department of Commerce

December 1, 2015

Richard Hart, Director
Department of Community Development
City of Covington
16720 SE 271st St.
Covington, WA 98042

Subject: PSRC Comments on Draft Covington Comprehensive Plan Update Growth Assumptions

Dear Mr. Hart,

Thank you for submitting the adopted 2015 Comprehensive Plan for certification review by the Puget Sound Regional Council. Certification is based on reviewing plans according to the plan review checklist to ensure that the plan is consistent with provisions of the Growth Management Act, VISION 2040 and the Regional Growth Strategy.

The draft updated plan for the City of Covington includes a number of impressive features as we noted in the comment letter provided on December 1, 2015. We appreciate the hard work that went into updating what is overall an excellent plan. However, we hope to discuss with you how to resolve the growth assumptions in the plan that significantly exceed the adopted growth targets for your community.

Recently, the Growth Management Policy Board and the Regional Staff Committee discussed how to review plans that are significantly out of alignment with adopted targets and the Regional Growth Strategy, specifically where local growth assumptions for Small Cities exceed the countywide growth targets and regional expectations as established in VISION 2040. The Growth Management Policy Board and Regional Staff Committee recognized that some local factors may be unavoidable, but also noted that the Regional Growth Strategy is important and cities should demonstrate how they are working toward it. Both noted as well that, while some local flexibility may be warranted, the countywide target setting process is the opportunity to regionally collaborate on the preferred distribution of growth.

We would like to work with you to better understand the growth assumptions in your plan and to identify whether there are any feasible plan changes that would demonstrate consistency with the Regional Growth Strategy, including lowering your growth assumptions to be more in line with adopted targets.

To aid reviewing Small Cities' plans that exceed adopted targets, staff proposed a draft framework to the Regional Staff Committee. While this review framework is still draft, it may facilitate our understanding of your community's plan. We would like your assistance understanding how the plan responds to the aspects of the framework, which addresses the following points:

Comment	City Response
<ul style="list-style-type: none"> • Document and explain rationale for local planning numbers. The plan and supporting documentation should make clear what factors were used to determine future growth estimates, including relevant detail on recent historical growth, development permits in the pipeline, and zoned capacity. The plan should make clear why the resulting growth assumptions represent a reasonable approach to balancing regional and countywide policies, targets, and impacts with local factors that may be beyond jurisdiction control. 	<p>See the City’s market study prepared in 2012 with the Northern Gateway Study, provided to PSRC on October 29, 2015.</p> <p>1) Within the City limits the City grew significantly between 2006 and 2012 (see market study and pp. LU-3 to LU-9 that document the rate of growth – higher than the County overall even during the recession), especially with jobs nearly meeting its jobs growth target and making a dent in its housing target even during the recession.¹ The City grew its jobs during the recession – uncommon in the region during that time. See for example Exhibit 10. Net Change in Employment by Year, King County, 2006-2012 in the Buildable Lands Report.</p> <p>2) The City’s pipeline of approved projects in 2012 forward shows 785 dwellings and 514 jobs (See Land Use Element Exhibit 6)– putting the City over its jobs target at the start of the plan and cutting in half its remaining housing target for the 20 years. Additionally, the City has: 1) a subarea plan for its Town Center, 2) a development agreement for a Downtown mixed use multi-story property, 3) a subarea plan of the Lakepointe site, and 4) has approved annexation of the Lakepointe site. The City must plan for the growth expected. To only plan for targets means the City cannot adequately plan for the resources and infrastructure its community needs.</p> <p>3) The City is planning in a responsible way with mixed uses in the Downtown</p>

¹ Unlike most cities in the County, Covington only counted finalized permits in its accounting of progress towards targets in its land capacity analysis, not just issued permits, a conservative approach.

Comment	City Response
	<p>and Lakepointe to reduce pressure on changes to the UGA boundary, and to properly provide for a range of housing and job choices. The City is applying reasonable measures and is minimizing any future potential for a UGA change.</p> <p>4) Growth management hearings board cases have indicated that targets are a floor and not a ceiling. (Davidson Serles, 09-3-0007c, FDO 10/5/2009, at 11.)</p> <p>5) VISION 2040 does not allocate specific growth targets to cities.²</p> <p>6) The City requested a change to targets in 2012, but King County indicated they would not be pursuing changes to targets and that it would happen in a future year but not in time for this plan review.</p> <p>7) The Department of Commerce is satisfied, and King County made no comments on the use of the market demand growth which shows the City can meet its growth targets.</p> <p>8) The City tested this proposed market-based growth with the Hawk Property Subarea Plan and EIS. The notice was provided to PSRC and the City received no comments.</p> <p>9) The City will be revisiting growth targets when the County revises its estimates after the 2017 OFM forecasts, as well as in the 8 year cycle per GMA and can account for any changed conditions at that time.</p>
<ul style="list-style-type: none"> • Support for the Regional Growth Strategy. The plan should include a VISION 2040 context statement that acknowledges the Regional Growth Strategy, including the role of Small Cities, along with a policy commitment to working toward achieving the Regional Growth 	<p>See pages LU-24 and LU-25 for a statement of consistency which is similar in level of detail and form as the example referenced.</p>

² See Regional Growth Strategy, pp. 17-19, http://www.psrc.org/assets/1737/Part_II_Regional_Growth_Strategy.pdf?processed=true.

Comment	City Response
<p>Strategy within the countywide framework for coordination around growth targets.</p>	
<ul style="list-style-type: none"> Actions to “bend the trend” of future growth. Given that some growth above and beyond adopted targets may be unavoidable, the plan should include policies and actions that move the city toward greater alignment with the growth targets and the Regional Growth Strategy over time, both within the 20-year planning period and beyond. PSRC staff is available to discuss with you a range of actions that may help to manage the amount and timing of future residential and employment growth. 	<p>To address that growth above and beyond the target is likely given the City’s pipeline growth and approved and pending development agreements and adopted mixed use plans for Downtown and Lakepointe, the City could amend the draft plan by:</p> <ol style="list-style-type: none"> 1) adding a policy to fix the growth target to reallocate growth from other Small Cities or the Unincorporated UGA or other communities to Covington; and 2) amending the Draft to better illustrate how the City’s approach to development helps manage growth – e.g. high quality LOS standards, transportation impact fees, addition of parks impact fees, SEPA conditions, design standards, etc. The City’s LOS standards are appropriate for its community (e.g. LOS D for transportation) and do not make it easy to develop. <p>PSRC comments about the range of actions affecting amount and timing of growth could be construed to mean metering permits, or changing growth plans in Downtown or at Lakepointe – that is beyond the scope of PSRC to request as GMA is a bottoms up approach, and the City is planning efficiently consistently with GMA goals to promote urban growth, avoid sprawl, and meet its community’s desired levels of service. Again, growth targets being a floor and not a ceiling:</p> <p><i>The Board reads these provisions together as indicating that the population and employment targets allocated to cities by countywide</i></p>

Comment	City Response
	<p><i>planning policies are intended to require each city to zone areas and densities sufficient to accommodate that growth; in other words, the targets create a floor for zoned capacity, not a ceiling. [Davidson Serles, 09-3-0007c, FDO 10/5/2009, at 11.]</i></p>
<ul style="list-style-type: none"> • Manage additional growth consistent with VISION 2040. The plan should include policies and actions that address the impacts of the higher planned growth numbers on local and regional infrastructure and on the adjacent area. Plans should demonstrate an extra effort to achieve compact development patterns, reduce impacts on regional facilities, and protect adjacent rural and resource lands. 	<p>The Downtown plan and Lakepointe plan shows the City’s efforts to achieve compact growth. The City’s LOS standards are appropriate for a municipality of Covington’s size and community’s quality of life, and do not burden the regional transportation system. The City is conditioning major developments to meet WSDOT requirements (e.g. Lakepointe). The City is allowing and promoting regional trails. The City is pursuing transit options. The City has strong parks standards and is adding parks impact fees.</p> <p>The City applies landscaping standards in all developments, and its densities at its borders are generally compatible with adjacent communities, natural systems (e.g. Soos Creek Trail and Greenway abutted by large lot residential), and rural lands. Where Lakepointe meets the rural area to the east, it will maintain a wide natural corridor along Jenkins Creek.</p> <p>Lakepointe and Downtown have design standards addressing major routes such as SR 18.</p>

Comment	City Response
<ul style="list-style-type: none"> • Coordination with other jurisdictions and agencies. Regional coordination is a hallmark of VISION 2040 and the countywide planning process. The plan should demonstrate a heightened degree of coordination with adjacent cities and towns, counties, and other agencies, such as WSDOT and local and regional transit agencies. Such coordination should address growth targets, transportation impacts, and compatibility of plans and investments where local planning departs from agreed-upon targets. 	<p>The City has engaged WSDOT and adjacent cities in 2013 with the Downtown Plan, Hawk Property Subarea Plan and Planned Action EIS. The City tested the proposed greater growth across the city’s planning area with the Hawk Property Subarea Plan and EIS. Notice was provided to PSRC and the City received no comments. The City is part of a multi-agency coalition addressing SE 272nd Street (SR 516). The City is coordinating with King County on regional trails. These are just a few examples of the City’s efforts.</p>

Thank you again for working with us through the plan review process. There is a lot of excellent work in the draft and we are available to continue to provide assistance and additional reviews as the plan moves through the development process. If you have questions or need additional information, please contact me at 206-971-3289 or mhubner@psrc.org.

Sincerely,



Michael Hubner, AICP
Principal Planner
Growth Management Planning

cc: Review Team, Growth Management Services, Department of Commerce

December 18, 2015

Richard Hart, Director
Department of Community Development
City of Covington
16720 SE 271st St.
Covington, WA 98042

Subject: PSRC Comments on Draft Covington Comprehensive Plan Follow Up

Dear Mr. Hart,

As expressed previously, thank you for submitting the adopted 2015 City of Covington comprehensive plan for certification review by the Puget Sound Regional Council. We appreciate the hard work that went into updating what is overall an excellent plan.

We appreciate the thorough responses to our initial comment letters sent to you on December 1. This letter is a requested follow up to the city's responses emailed on December 10. Our focus here will be the issues covered under the subject of "PSRC Comments on Draft Covington Comprehensive Plan Update Growth Assumptions" which were discussed in our meeting on December 11. We are available to also provide feedback regarding other comments and questions of PSRC's plan review, as needed. Please feel free to call us to discuss.

As you are aware, certification is based on reviewing plans for consistency with provisions of the Growth Management Act, VISION 2040 and the Transportation 2040. The scope of PSRC's comments regarding the growth planned for in the comprehensive plan are based specifically on the Regional Growth Strategy in VISION 2040 and prior guidance from the PSRC boards on addressing alignment with that strategy in reviewing plans for regional certification.

Recent discussions at the GMPB and Regional Staff Committee have focused on clarifying a framework and criteria for certification of plans adopted by jurisdictions classified as Small Cities and planning for housing and/or employment growth significantly exceeding adopted countywide targets. We included the proposed framework in our earlier letter and repeat it here as a way of organizing our comments.

Comment	City Response
<p>1. Document and explain rationale for local planning numbers. The plan and supporting documentation should make clear what factors were used to determine future growth estimates, including relevant detail on recent historical growth, development permits in the pipeline, and zoned capacity. The plan should make clear why the resulting growth assumptions represent a reasonable approach to balancing regional and countywide policies, targets, and impacts with local factors that may be beyond jurisdiction control.</p> <p><i>Comment: Exhibit 6 in the land use element of the plan and supporting text do a good job of showing the basis for the housing and employment growth anticipated by the City of Covington. This is important information for the GMPB to consider in reviewing the overall plan and specifically in evaluating how the plan has addressed regional policy in light of local factors.</i></p>	<p>Thank you for acknowledging the City’s information. The Land Use Element is further amended to explain the planning numbers, including the level of pending development and approved plans, such as in Downtown and with Lakepointe Urban Village.</p>
<p>2. Support for the Regional Growth Strategy. The plan should include a VISION 2040 context statement that acknowledges the Regional Growth Strategy, including the role of Small Cities, along with a policy commitment to working toward achieving the Regional Growth Strategy within the countywide framework for coordination around growth targets.</p> <p><i>Comment: The Statement of Consistency in the land use element addresses VISION 2040, but should be amended to acknowledge and support the Regional Growth Strategy, including intent to pursue policies and actions that work toward a level of growth and development in Covington that is consistent with its role in the region as a Small City, while at the same time managing the growth that is anticipated in a way that achieves broader policy guidance in VISION 2040.</i></p>	<p>The statement of consistency is further amended to identify the City’s Small City role, and the City’s intent to continue intergovernmental coordination, monitor growth, and revise growth targets.</p>

Comment	City Response
<p>3. Actions to “bend the trend” of future growth. The plan should include policies and actions that move the city toward greater alignment with the growth targets and the Regional Growth Strategy over time, both within the 20-year planning period and beyond.</p> <p><i>Comment: Neither the draft plan nor the city’s response to our earlier comments address policies or actions that would affect the amount or timing of development to achieve a closer alignment with the targets or with VISION 2040. This is something that should be addressed in the final adopted plan.</i></p>	<p>The plan has been amended to further specify the City’s approach:</p> <ul style="list-style-type: none"> • Added a new framework policy on intergovernmental coordination in the Plan Foundation chapter. • Text on targets and capacity has been updated on pages LU-8 to LU-10. The graph shows “unavoidable growth.” • The VISION 2040 “consistency statement” is amended to address coordination, monitoring, and revising targets. • Policy LU-3 is added regarding targets. • Policy LU-20 has an added sentence on coordination with King County on any UGA changes. • Policy LU-22 has been added addressing growth monitoring. • Policy LU-23 is added and provides a criteria for future Comprehensive Plan land use designation requests.
<p>4. Manage additional growth consistent with VISION 2040. The plan should include policies and actions that address the impacts of the higher planned growth numbers on local and regional infrastructure and on the adjacent area. Plans should demonstrate an extra effort to achieve compact development patterns, reduce impacts on regional facilities, and protect adjacent rural and resource lands.</p> <p><i>Comment: As noted in your response to our earlier comments, Covington has done a number of things to manage its expected growth that are exemplary in addressing both local and regional goals. Your response suggests that the city would consider “amending the Draft to better illustrate how the City’s approach to development helps manage</i></p>	<p>See responses above.</p> <p>Also, see City policies addressing LOS standards and service coordination (policies LU-7, TR-2 and CF-1), impact fees (LU-7, HO-9, TR-32, Exhibit TR-12, CF-25, CF-29, CF-30 and pages CF-4 and CF-5 addressing fire, school, park impact fees), and high quality design (Goal LU-II, Policies LU-5, LU-6, LU-8, LU-11, LU-26, LU-29 to LU-34, LU-37 and LU-38, LU-40).</p>

Comment	City Response
<p><i>growth – e.g. high quality LOS standards, transportation impact fees, addition of parks impact fees, SEPA conditions, design standards, etc.” The city has a good story to tell here and we encourage you to emphasize it in the plan. With regard to protecting adjacent rural and resource lands, we appreciate the proposed edit to Policy LU-19 ensuring coordination with King County consistent with Countywide Planning Policies. As discussed at the December 11 meeting, the city may also consider removing this policy from the draft plan and we encourage you to explore this option.</i></p>	
<p>5. Coordination with other jurisdictions and agencies. Regional coordination is a hallmark of VISION 2040 and the countywide planning process. The plan should demonstrate a heightened degree of coordination with adjacent cities and towns, counties, and other agencies, such as WSDOT and local and regional transit agencies. Such coordination should address growth targets, transportation impacts, and compatibility of plans and investments where local planning departs from agreed-upon targets.</p> <p><i>Comment: As noted, the City of Covington has done a number of things to achieve a high level of coordination with other jurisdictions and agencies, including WSDOT, nearby cities, and King County. We recommend that you highlight those efforts in the final adopted plan and in supporting documents.</i></p>	<p>See responses above.</p>

Thank you again for working with us through the plan review process. We want to help the city stay on schedule. If the city is unable to respond to all aspects of the framework criteria at this time, it may be possible for the plan to be conditionally certified provided that the city expresses a commitment to make further amendments in the coming year. We are available to continue to provide assistance and additional reviews as the plan moves through the development process. If you have questions or need additional information, please contact me at 206-971-3289 or mhubner@psrc.org.

Sincerely,



Michael Hubner, AICP
Principal Planner
Growth Management Planning

cc: Review Team, Growth Management Services, Department of Commerce

ATTACHMENT 7

ORDINANCE NO. 02-2016

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF COVINGTON, KING COUNTY, WASHINGTON RELATING TO PERIODIC MAJOR UPDATES TO THE COVINGTON COMPREHENSIVE PLAN IN ACCORDANCE WITH THE WASHINGTON STATE GROWTH MANAGEMENT ACT (CHAPTER 36.70A RCW); ADOPTING THE NEW 2015-2035 COVINGTON COMPREHENSIVE PLAN IN ITS ENTIRETY; REPEALING THE 2001 COMPREHENSIVE PLAN AND ALL AMENDMENTS THEREAFTER; READOPTING THE SHORELINE MASTER PROGRAM, HAWK PROPERTY SUBAREA PLAN, AND PLANNED ACTION BY REFERENCE TO THE 2015-2035 COMPREHENSIVE PLAN; PROVIDING FOR SAVINGS, SEVERABILITY, RATIFICATION, AND CORRECTIONS; AND ESTABLISHING AN EFFECTIVE DATE.

WHEREAS, in compliance with the Washington State Growth Management Act, Chapter 36.70A RCW, and amendments thereto, (the “GMA”) the City of Covington (the “City”) adopted its Comprehensive Plan on September 1, 2001; and

WHEREAS, pursuant to RCW 36.70A.130, an adopted comprehensive plan is subject to continuing review and evaluation, but may be amended no more than once per calendar year; and

WHEREAS, in addition to the above annual amendments, RCW 36.70A.130 also requires an adopted comprehensive plan to be subject to a major, substantive periodic review, on a dictated schedule, to ensure the plan and related development regulations comply with the requirements of the GMA (“Periodic Updates”); and

WHEREAS, since adoption of its original Comprehensive Plan, the City has performed two required Periodic Updates, resulting in major amendments to the original Comprehensive Plan in 2005, 2009, and 2011; and

WHEREAS, the City Council has also considered and adopted, if needed, regular, non-substantive amendments considered on an annual basis; and

WHEREAS, in accordance with RCW 36.70A.130, on or before June 30, 2015, cities in King County must perform a Periodic Update and revise, if needed, an adopted comprehensive plan and development regulations to ensure the plan and regulations comply with the requirements of the GMA, and must then repeat said Periodic Update every eight (8) years thereafter; and

WHEREAS, pursuant to the GMA requirements, on June 23, 2014, at a community workshop, the City initiated the 2015-2035 Covington Comprehensive Plan Periodic Update, which looks forward to guide planning policies for the next twenty years (2015—2035); and

WHEREAS, the City has undergone tremendous changes since its Comprehensive Plan was originally adopted and since the last major update, accordingly, City staff and consultants embarked on a complete review and update of the City's entire Comprehensive Plan (the proposed "2015-2035 Covington Comprehensive Plan" or "2015-2035 Comprehensive Plan") to respond to and be consistent with the requirements of Chapter 36.70A RCW, VISION 2040, and the Countywide Planning Policies; and

WHEREAS, in 2012 the City commissioned a Market Demand Study, the outcomes of which recognized that under the existing zoning, the City could accommodate all of its share of projected population and job growth through 2035; and

WHEREAS, given said population and job growth trends and approved development, the City has established new estimates for the amount of growth over the next twenty years (2015-2035) that must be addressed in the City's proposed 2015-2035 Comprehensive Plan; and

WHEREAS, the proposed 2015-2035 Comprehensive Plan anticipates growth of approximately 3,920 additional housing units and approximately 3,706 jobs between 2012 and 2035; and

WHEREAS, the proposed 2015-2035 Comprehensive Plan supports a strategy that focuses on the City's growth in the City's Downtown and the Lakepointe Urban Village Subarea (previously known as the Hawk Property Subarea) Areas to accommodate mixed-use development that will complement and serve existing neighborhoods and provide for commercial uses that serve the community's needs; and

WHEREAS, the City has reviewed the GMA and has identified that as part of the Periodic Update, the 2015-2035 Comprehensive Plan should, among other things, accept the new growth targets for households and jobs for the period from 2012 through 2035, and those new targets should be based on new elements, a Capital Facilities Appendix, an Existing Conditions Report, and a Best Available Sciences Report to reflect the additional growth in the 2015-2035 planning period; and

WHEREAS, the City intends to adopt future amendments to its Critical Areas regulations (Chapter 18.65 CMC) to include Best Available Science and better reflect local conditions and opportunities in accordance with the GMA; and

WHEREAS, the proposed 2015-2035 Comprehensive Plan identifies the infrastructure and capital investments required to support growth and changing community needs and is linked to facility plans for transportation, utilities, parks, and other public facilities; and

WHEREAS, the proposed 2015-2035 Comprehensive Plan seeks to preserve and enhance the community's quality of life, including economic opportunities, housing choice, quality of

neighborhoods, public safety, human and community services, and parks, recreation, and open space areas; and

WHEREAS, the City has provided for public participation in the development and review of the proposed 2015-2035 Comprehensive Plan to comply with the GMA, including requirements for early and continuous public participation in the development and amendment of the City's Comprehensive Plan; and

WHEREAS, throughout 2014 and 2015, the City embarked on a community outreach campaign to provide numerous opportunities for community involvement in creating a shared plan for the City's future, including community workshops, stakeholder interviews, a "Storefront Studio" in a centrally-located retail space for drop-in visits to ask questions of City staff, and several open houses and public meetings; and

WHEREAS, the City also encouraged public participation and provided information on the 2015 Comprehensive Plan update on its website (<http://covingtonwa.gov/update2015>); and

WHEREAS, as a result of the City's efforts, the public has had extensive opportunities to participate throughout the 2015-2035 Comprehensive Plan Periodic Update process and all persons desiring to comment on the proposed updates were given a full and complete opportunity to be heard; and

WHEREAS, the City's Planning Commission held a public hearing on November 19, 2015, to take public testimony on the proposed 2015-2035 Comprehensive Plan; and

WHEREAS, the Planning Commission has recommended that the City Council approve the proposed 2015-2035 Comprehensive Plan on file with the City Clerk; and

WHEREAS, the City Council held a public hearing on January 12, 2016, to consider the Planning Commission's recommendation and to take further public testimony; and

WHEREAS, the City Council has reviewed and considered the public testimony made at the public hearing(s), and other pertinent material regarding the 2015-2035 Comprehensive Plan; and

WHEREAS, the City Council finds that the proposed 2015-2035 Comprehensive Plan to be adopted is consistent with the GMA, and will protect and promote the health, safety, and welfare of the general public; and

WHEREAS, the City has complied with the requirements of the State Environmental Policy Act (Chapter 43.21C RCW), including the publication of a Determination of Significance, Adoption of Existing Documents and Addendum on November 13, 2015.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF COVINGTON, KING COUNTY, WASHINGTON, DO ORDAIN AS FOLLOWS:

Section 1. Findings. After reviewing the record and considering the evidence in the record and at public meetings, the City Council hereby adopts all of the above recitals and the findings, analysis, and conclusions contained in the City Planning Commission Staff Memo prepared for the November 19, 2015 public hearing.

Section 2. Adoption of 2015 Covington Comprehensive Plan. The 2015 Covington Comprehensive Plan, as set forth in the attached Exhibit A and fully incorporated herein by this reference, is hereby adopted and approved in its entirety as the comprehensive plan for the City of Covington, Washington.

Section 3. Repeal of 2001 Covington Comprehensive Plan and Amendments. The 2001 Covington Comprehensive Plan, originally adopted by Ordinance No. 24-01, and thereafter amended by Ordinance Nos. 02-02, 16-02, 45-02, 46-02, 47-02, 48-02, 49-02, 50-02, 51-02, 55-02, 56-02, , 70-03, 84-03, 85-03, 86-03, 87-03, 88-03, 89-03, 90-03, 91-03, 92-03, 94-03, 11-05, 15-05, 23-05, 31-05, 20-08, 23-09, 10-11, 02-14, 11-14, (the "Repealed Comprehensive Plan Ordinances") and Resolution 03-167, are hereby repealed in full.

Section 4. Effect on Adopted Plans.

- a. Shoreline Master Program.** Upon the effective date of this ordinance, the City of Covington Shoreline Master Program, adopted by Ordinance No. 05-11, shall be incorporated by reference and readopted within the 2015-2035 Covington Comprehensive Plan.
- b. Hawk Subarea Plans.** Upon the effective date of this ordinance, the Hawk Property Subarea Plan, adopted by Ordinance No. 01-14, as amended, shall be incorporated by reference and readopted within the 2015-2035 Covington Comprehensive Plan and referred to as the Lakepointe Urban Village Subarea.
- c. Hawk Property Planned Action.** Upon the effective date of this ordinance, the Hawk Property Planned Action, adopted by Ordinance No. 04-14, as amended, shall be incorporated by reference and readopted within the Covington Comprehensive Plan.

Section 5. Savings Clause. The Repealed Comprehensive Plan Ordinances and Resolution 03-167 shall remain in full force and effect until the 2015-2035 Covington Comprehensive Plan adopted in Section 2 herein becomes operative upon the effective date of this ordinance; AND at any time should the 2015-2035 Covington Comprehensive Plan be found unlawful or invalidated in its entirety, the Repealed Comprehensive Plan Ordinances and Resolution 03-167 shall spring back into full force and effect.

Section 6. Severability. The provisions of this ordinance are declared separate and severable. The invalidity of any clause, sentence, paragraph, subdivision, section, or portion of this ordinance, or the invalidity of the application thereof to any person or circumstance, shall not affect the validity of the remainder of the ordinance or the validity of its application to other persons or circumstances.

Section 7. Ratification. Any act consistent with the authority and prior to the effective date of this ordinance is hereby ratified and affirmed.

Section 8. Corrections by City Clerk. Upon approval of the City Attorney, the City Clerk and the codifiers of this ordinance are authorized to make necessary technical corrections to this ordinance, including, without limitation, the correction of clerical errors; references to other local, state, or federal laws, codes, rules, or regulations; or section/subsection numbering.

Section 9. Effective Date. This ordinance shall be in full force and effect five (5) days after its passage and legal publication. A summary of this ordinance, consisting of the ordinance title, may be published in lieu of publishing the ordinance in its entirety.

Passed by the City Council of the City of Covington, Washington at its regular meeting on the 12th of January 2016, and signed in authentication of its passage.

CITY OF COVINGTON

Mayor

PUBLISHED: January 15, 2016

EFFECTIVE: January 20, 2016

ATTESTED:

Sharon Scott
City Clerk

APPROVED AS TO FORM ONLY:

Sara Springer
City Attorney