



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

City Hall – 253.480.2400
www.covingtonwa.gov

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

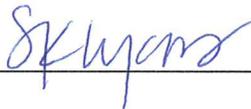
City of Covington Department of Community Development, 16720 SE 271st St. #100, Covington, WA 98042
253-480-2444

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

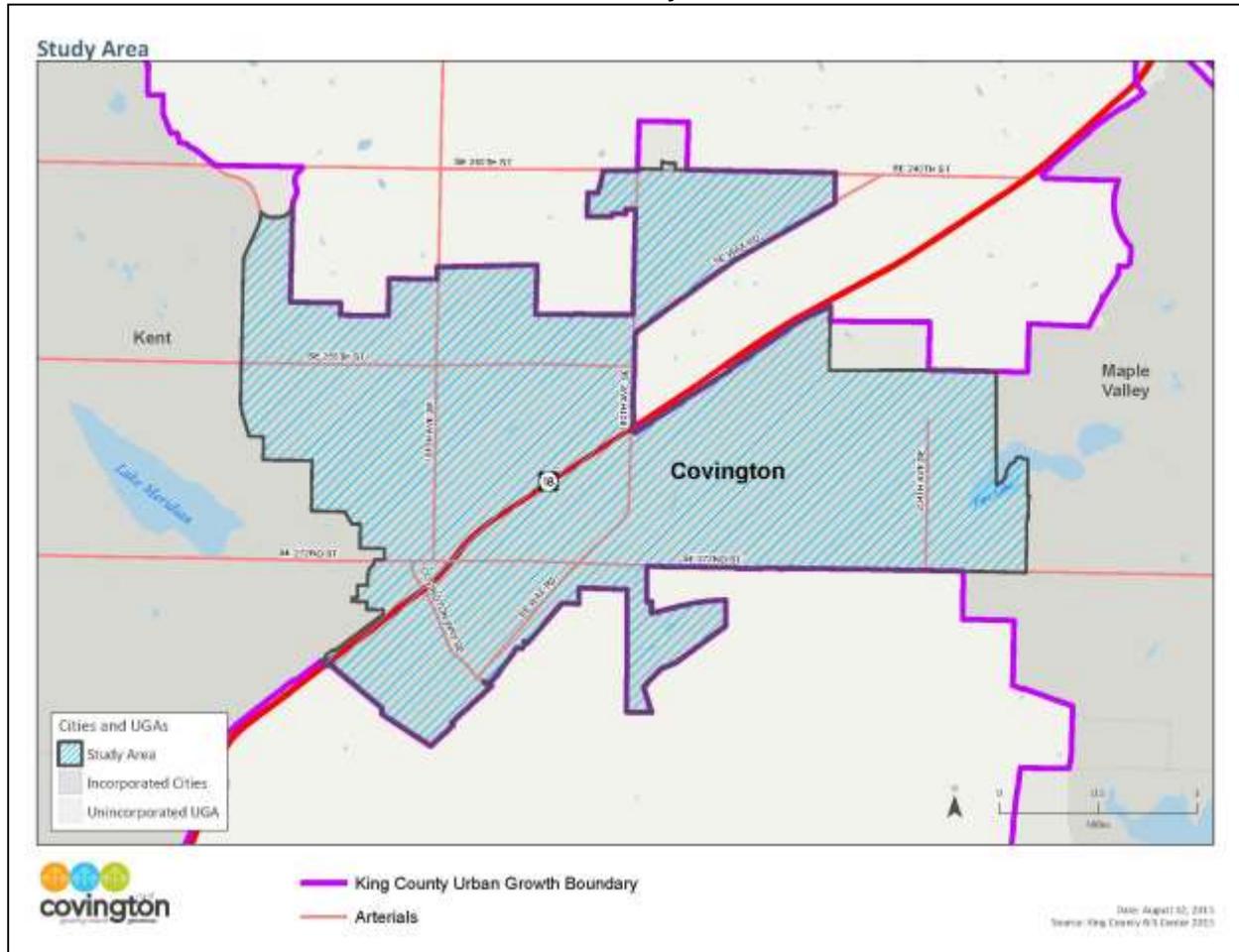
SEPA allows phased review where the sequence of a proposal is from a programmatic document, such as an EIS or SEIS addressing a comprehensive plan, to other documents that are narrower in scope, such as those prepared for site-specific, project-level analysis (WAC 197-11-060(5)). Additional environmental 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 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?

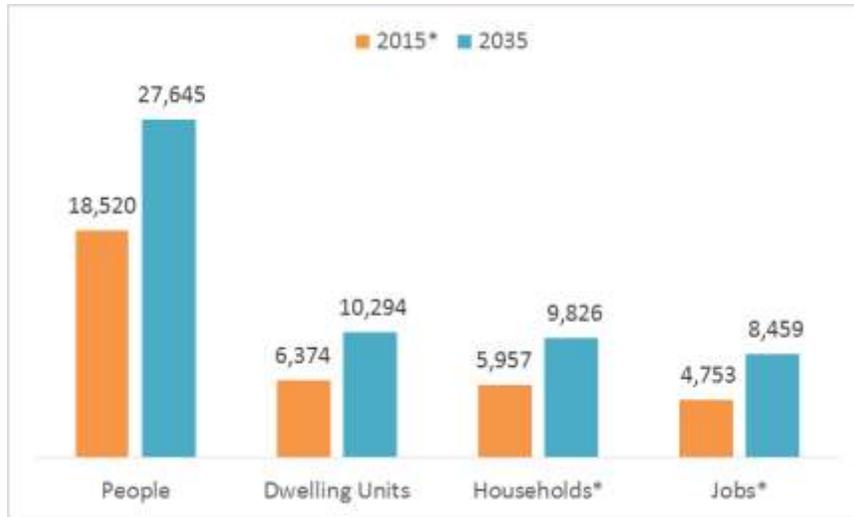
Population and Employment Growth

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	

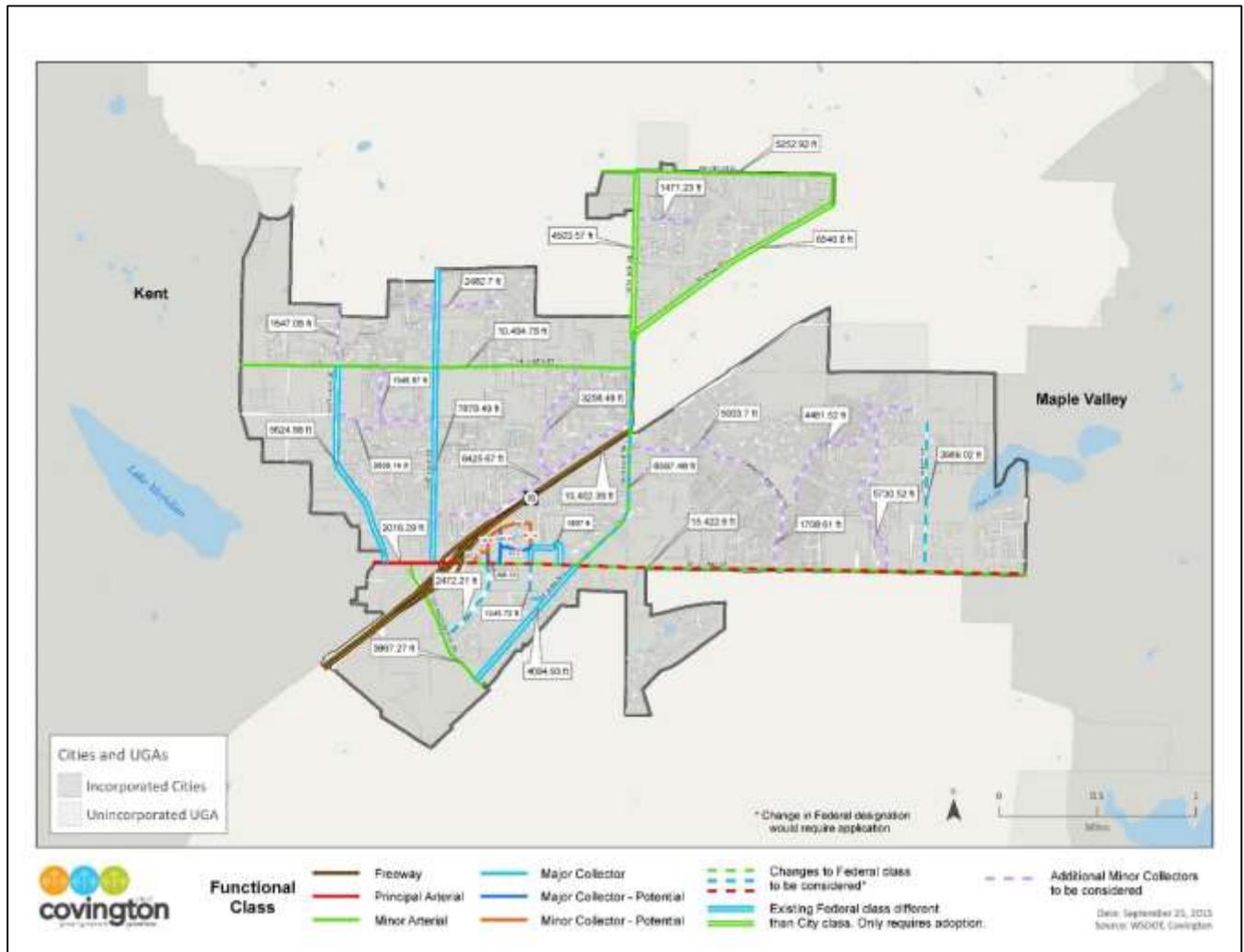
1. Determined through design of Capital Improvement Program (CIP) project # 1056/1149
Sources: David Evans and Associates and Heffron Transportation 2015

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



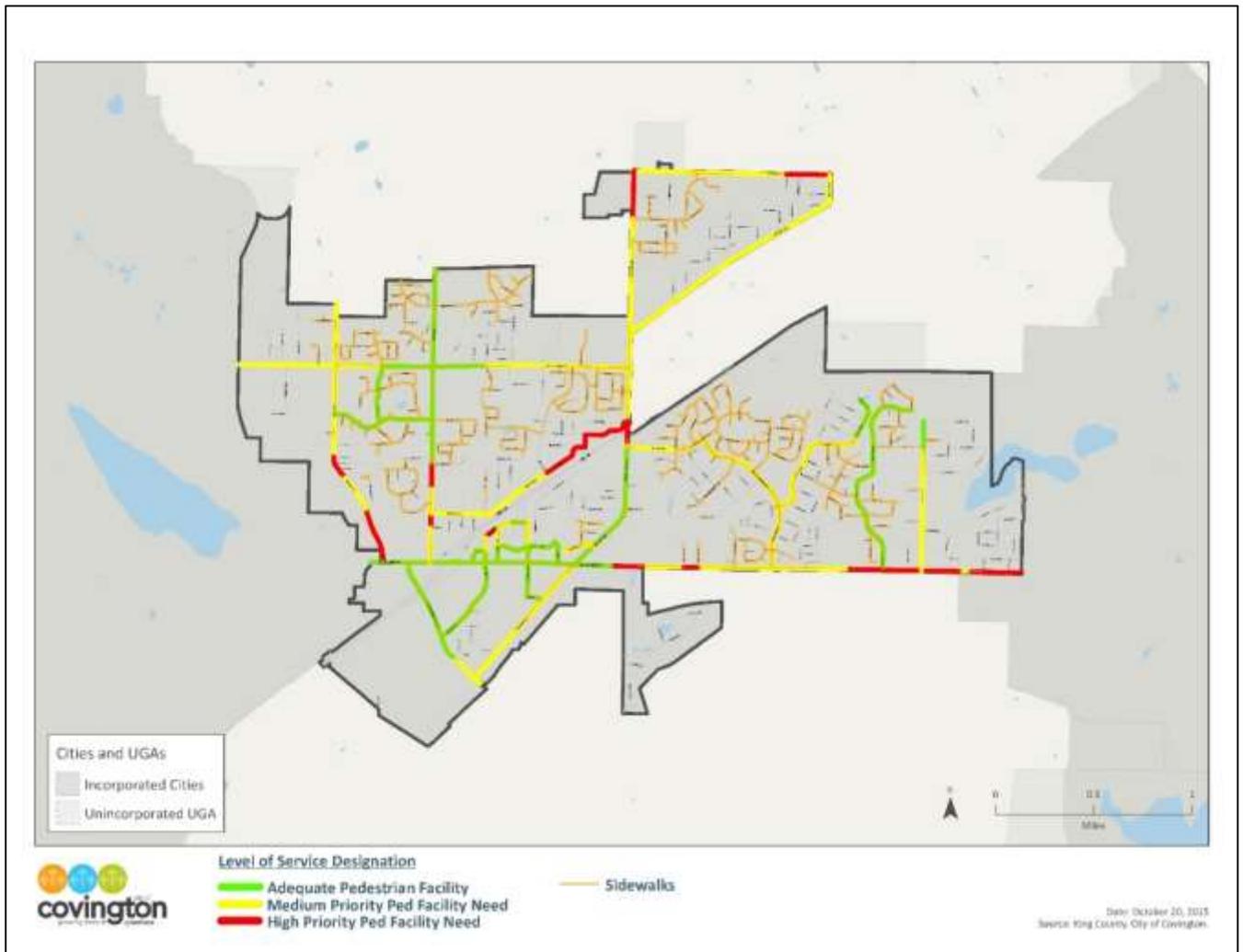
Source: City of Covington 2015

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.

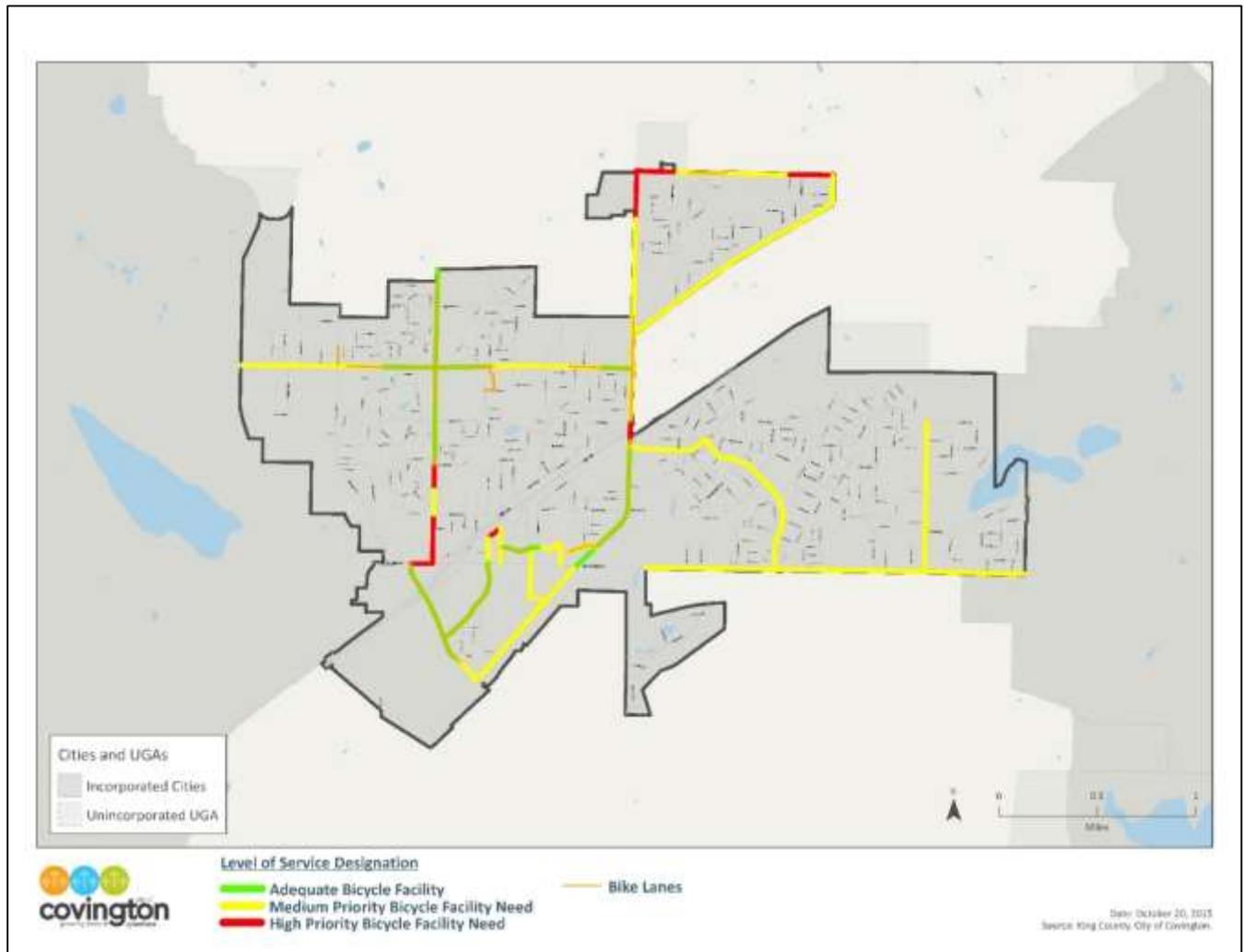
Exhibit 10 shows the medium and high priority walkway needs, and Exhibit 11 shows the medium and high priority bike facility needs, based upon the City’s proposed walkway and bike facility LOS standards in the draft Transportation Element.

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.

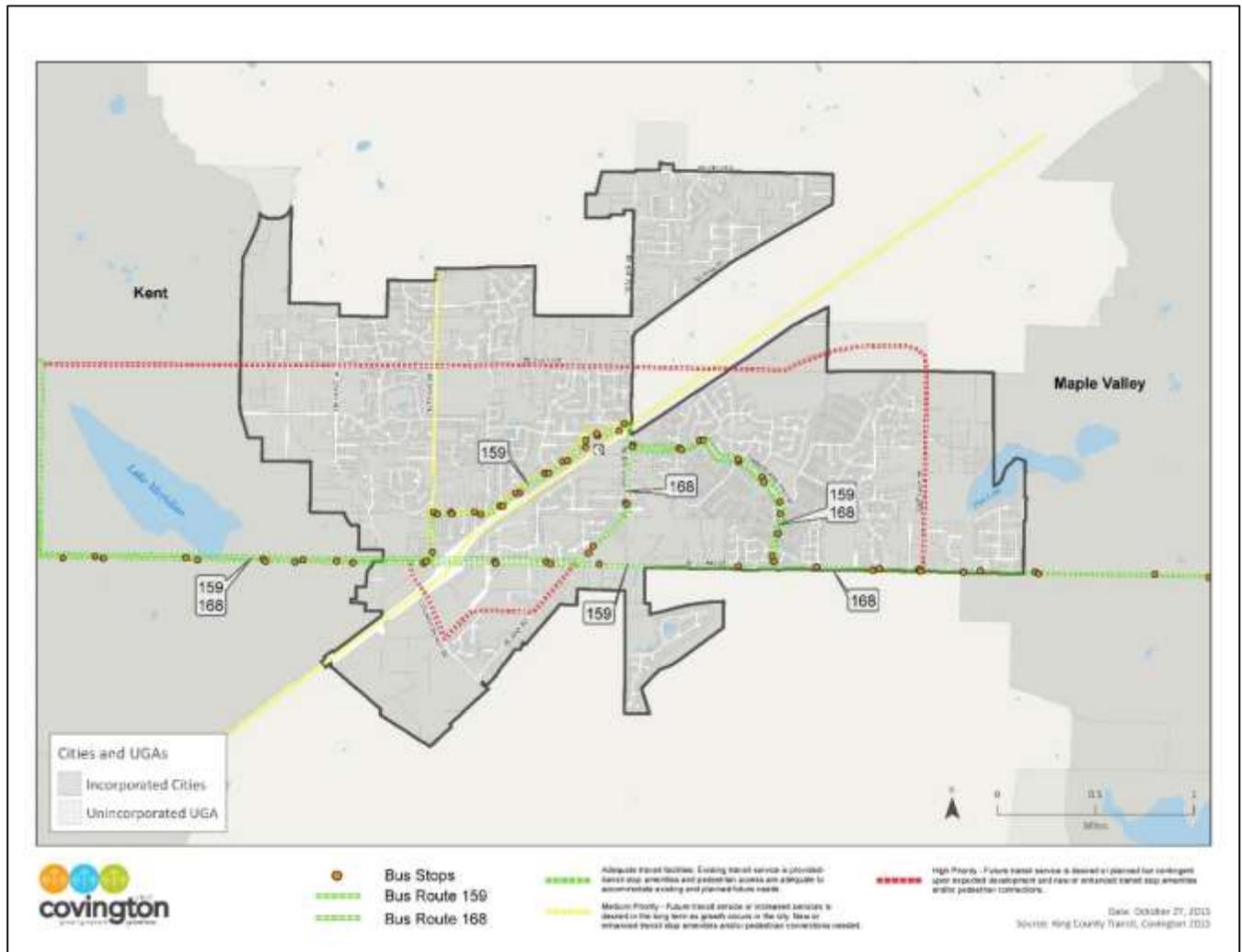
A new transit route is desired to support planned redevelopment at the Lakepointe Urban Village site, located in the northwest area of Covington. The proposed additional transit route would connect the property to other destinations in Covington and beyond via 204th Avenue SE and SE 256th Street. To 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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