



City of Covington

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King County Council
516 Third Avenue, Room 1200
Seattle, WA 98104

RE: City of Covington Request to add the Jenkins Creek Notch to the UGA

Dear Councilmembers:

On behalf of the Covington City Council, I am formally transmitting the final Northern Gateway Area Study report to the King County Council and Executive staff. We are requesting that you add the Jenkins Creek Notch to the City of Covington's Urban Growth Area (UGA) during your process to amend the King County Comprehensive Plan this fall.

The study area includes two large tracts of land located northwest and southeast of State Route 18, encompassing 484 acres of land located within King County, Covington's UGA, and Covington's city limits as follows:

- 1) Approximately 275 acres, commonly referred to as the Jenkins Creek Notch, located on the northwest side of SR 18. This area is designated rural King County but has been identified by the city's Comprehensive Plan over the past eight years as desirable for inclusion in our UGA. Approximately 60 acres of this area is owned by BranBar LLC, who submitted a request last year to be included in the scoping motion for the 2012 process; and
- 2) Approximately 210 acres, located southeast of State Route 18, designated within Covington's UGA and associated with property owned by the Hawk family. The majority of this property is located within the city limits and is zoned as Mineral (M). The property is currently being used for a gravel extraction and an asphalt operation.

The purpose of this Northern Gateway Area Study was to evaluate the above areas and gain a better understanding of the existing conditions of the total study area; the city's buildable land capacity for housing and job targets; the 20-year market demands for retail, office and housing; and to determine the feasibility of expanding the boundary of Covington to include the 275 acres of the Jenkins Creek Notch, hereafter referred to as the Notch. As it pertains to King County's decision on the Notch, our consultant evaluated the properties and several key policy issues to determine whether or not the city's UGA can be expanded to include the Notch.

The consultant's findings considered the following requirements, as set forth by King County:

1. The consistency with state and King County requirements;
2. The character of the area as either "Rural" or "Urban" in nature;
3. The capacity to meet established housing and job targets under the 2007 Buildable Lands Report (BLR);

4. The presence of urban services;
5. The absence of resource lands: and
6. The adequate protection of critical areas.

Overall, the study indicates that Covington meets five of the six criteria for expanding the UGA to include the Notch. The city would like to stipulate from the outset that we recognize the Notch fails to meet criterion 3, and that the results of the study indicate that the existing land supply and capacity within the city limits and our current UGA can meet the 2007 allocated housing and job growth targets. However, if the Notch were added to the Covington UGA, it would represent only a fraction of the city's entire UGA (0.1%).

It has become evident through the course of this study that there are a few unintended consequences placed upon the city as a result of the outdated 2031 growth targets given to the city under the 2007 BLR, and numerous mitigating factors suggest those targets may have been allocated below the trends that were occurring in southeast King County at that time. Those targets are no longer appropriate given the economic growth seen in our city over the past five years. Since 2007, the demand for regional commercial and office services, along with additional health care jobs, has substantially increased in the area. The city has already exceeded its relatively small job targets by 200% in the first six years of the 25-year planning period, in spite of the worst economic slowdown since the Great Depression. In 2008-2009, the city completed its new economic development element in its Comprehensive Plan, which outlines the city's economic profile. It was determined at that time that the employment growth already exceeded targets set for 2022, and that the city has begun to position itself to be a medical service provider and regional retail service center for southeast King County. As it pertains to residential growth, the city has met nearly half of its allocated residential growth targets (48%), and the city continues to see a high demand for residential growth.

The pace of permitted residential developments and high job creation numbers, together with our market study, clearly show a demand for more growth in Covington. Further, Covington is the fastest growing city in terms of retail trade in the state. Retail services in Covington focus on a much larger market within rural King County beyond just Covington residents. If the growth targets had been allocated more in-line with the growth and market demands we have seen the past six years, Covington would need more land capacity within existing city limits to meet the market demand. While one may argue that there is sufficient land within the city boundary to accommodate the additional growth, the reality is that the city's existing vision for our downtown and zoning patterns do not accommodate the market demand for a large regional retail center. Most of our available properties are very small in size and not concentrated together in large sites. In short, the BLR and criteria fail to recognize land suitability versus actual retail needs.

Much of our downtown commercial land lends itself to more infill development with small commercial and office buildings and is intended to provide a sense of place to the Covington community. The available vacant or re-developable properties in the downtown are not conducive to locate a future retail center, and the city is responding to the needs and desires of our residents to shop locally and create a reduced carbon footprint by not driving many miles for regional retail services.

The Notch is surrounded on three sides by the City of Covington and development patterns are similar to those found across the streets within the city limits. This irregular city boundary makes little sense as the Notch is a peninsula jutting into the existing city limits. Common sense suggests that this Notch should have been within the original city limits of Covington upon its incorporation in 1997, since the land is very similar to surrounding properties that were included in the original city limits. All the properties in this area have access to public services, including water, sewer, parks, schools, storm drainage, and fire/emergency services. In fact there are several business entities within the Notch itself. Due to their proximities to the city, the properties within the Notch are already characterized by urban growth. The existing lot ownership pattern of the Notch is not significantly different than that of the city limits to the north, west and southwest. Further, the Notch is located on a major freeway interchange, thus it commands a very logical and underutilized location for regional commercial retail services. Major financial investments have been made in this freeway location, and those investments should be recognized and recouped through economic investment that will benefit all levels of government.

The Notch does not contain resource lands of long-term significance for agriculture, forestry or minerals, and it does not meet the criteria for designated resource lands. The city's current critical area regulations, which are modeled after King County's regulations, have been adequate for protecting three large streams and numerous wetland resources within the city limits. It is reasonable to state that our critical regulations would certainly meet the needs for protection of the functions and values of the wetland, stream and steep slope habitats of the Notch. Understanding the value and concern for this section of Jenkins Creek, the city has indicated a willingness to increase the critical area buffers as part of our future subarea planning prior to annexation to match those of King County.

The Covington City Council thanks you for your time to read and evaluate the Northern Gateway Area Study and for considering our desire to modify our urban growth boundary to include the Notch. The city will attend the GMPC meeting on September 11, 2012, and King County Council Committee meetings on September 12 and 19, 2012 to advocate for the city's position to add the Notch to the UGA.

Respectfully,



Margaret Harto, Mayor
City of Covington

Encl: Northern Gateway Study, dated August 13, 2012
Cc: Dow Constantine, King County Executive
Fred Jarrett, Deputy King County Executive
John Starbard, Director of Development and Environmental Services
Covington City Councilmembers