CITY OF COVINGTON
SPECIAL MEETING AGENDA
CITY COUNCIL JOINT STUDY SESSION WITH PLANNING COMMISSION
Council Chambers – 16720 SE 271st Street, Suite 100, Covington
www.covingtonwa.gov

Tuesday, April 12, 2011 - 6:00 p.m.

**Please note meeting start time**

GENERAL INFORMATION:
The study session is an informal meeting involving discussion between and among the City Council, Commission (if applicable) and city staff regarding policy issues. Study sessions may involve presentations, feedback, brainstorming, etc., regarding further work to be done by the staff on key policy matters.

CALL CITY COUNCIL JOINT STUDY SESSION TO ORDER

ROLL CALL

APPROVAL OF AGENDA

ITEM(S) FOR DISCUSSION
1. Planning Commission Recommendation for 2011 Comprehensive Plan Amendment Docket (Lyons)

PUBLIC COMMENT Persons addressing the Council shall state their name, address, and organization for the record. Speakers shall address comments to the City Council, not the audience or the staff. Public Comment shall be for the purpose of the Council receiving comment from the public and is not intended for conversation or debate. Public comments shall be limited to no more than four minutes per speaker. If additional time is needed a person may request that the Council place an item on a future agenda as time allows.

ADJOURN

Any person requiring disability accommodation should contact the City of Covington at (253) 638-1110 a minimum of 24 hours in advance. For TDD relay service, please use the state’s toll-free relay service (800) 833-6384 and ask the operator to dial (253) 638-1110.

*Note* A Regular Council meeting will immediately follow at approximately 7:00 pm
SUBJECT: DISCUSS PLANNING COMMISSION RECOMMENDATION FOR 2011 COMPREHENSIVE PLAN AMENDMENT DOCKET

RECOMMENDED BY: Richard Hart, Community Development Director
Salina Lyons, Senior Planner

ATTACHMENTS:
1. 2011 Comprehensive Plan Amendment Docket Instruction Guide and Timeline
2. Application CPA 2011-1 Shoreline Master Program (SMP) Update
3. SMP New Element Ch. 13 in Comprehensive Plan
4. Application CPA 2011-2 Parks Plan
5. Parks Plan New Element Ch. 6 in Comprehensive Plan
6. Application CPA 2011-3 Replace Missing Segment of 171st as Type I Street in the Town Center Zone of Ch. 5 Downtown Element of Comprehensive Plan
7. Revised Figure 4.5 Downtown Street Type Map Replacing Missing Segment of 171st in Ch. 5 Downtown Element of Comprehensive Plan
8. Application DRA 1-2011 Designate Proposed 171st as a Type I Street in Development Regulations
9. Development & Design Standards Downtown Street Types Map
10. 20-Year CIP Street Types Map Figure 5.7 for Downtown Zones in Comprehensive Plan
11. Final Planning Commission Memo on 2011 Comprehensive Plan Amendment Docket
12. Comment Letter from Don Ramsey, Ashton Co, on CPA 2011-3 and DRA 2011-1
13. Comment Letter from Doug Mergenthaler, Ashton Co, on CPA 2011-3 and DRA 2011-1

PREPARED BY: Richard Hart, Community Development Director and Salina Lyons, Senior Planner

EXPLANATION:
Each year in April the Planning Commission makes a recommendation to the Council on the official docket of Comprehensive Plan and/or Development Regulation Amendments which have been proposed and submitted to the Planning Commission in January 2011. This year there were three (3) different Comprehensive Plan Amendments (CPA) and one (1) Development Regulation Amendment (DRA) submitted to the Planning Commission as part of the formal docketing process. February 1, 2011, was the deadline for submittal of proposed items to be considered this year as part of the 2011 Docket. The Instruction Guide and Timeline for a Comprehensive Plan and/or Development Regulation Amendment are included as Attachment 1. The following list represents the 2011 CPA & DRA Docket recommended by the Commission:
1.) CPA 2011-1: The New Shoreline Master Program (SMP), which will be incorporated as Ch.13 in the Comprehensive Plan, was submitted by the Community Development Department. See Attachments 2 and 3.
2.) CPA 2011-2: The New Parks Plan, which will be incorporated as Ch. 6 in the Comprehensive Plan, was submitted by the Parks Department. See Attachments 4 and 5.
3.) CPA 2011-3: A revised Downtown Street Type Map replacing a missing segment of the proposed 171st Ave SE as a Type I Street in Ch. 5 of the Downtown Element of the Comprehensive Plan was submitted by the Planning Commission. See Attachments 6 and 7.


The Planning Commission held several meetings to discuss the proposed docket in February and March of this year. They held a public meeting on March 17, 2011, to receive comments and review public input on the proposed docket. (See Attachment 11) There was one objection presented to the Commission by a private entity, Ashton Corporation LLC, about two docketed items, CPA 2011-3 and DRA 2011-1. These amendments replace the missing street segment for the proposed 171st Ave SE in the Downtown Element Map and the Transportation Element CIP Map of the Comprehensive Plan and in the Development & Design Standards Street Type Map of the City Zoning Code. The objection states that replacing the missing proposed 171st street would reduce the net area for development of adjacent land and impact any future development of Ashton’s property.

Tonight’s meeting is to discuss the recommendations of the Planning Commission and allow the council to request any further information from either the city staff or Planning Commission prior to the scheduled Council adoption of the Final Comprehensive Plan and Development Regulation Amendment Docket on April 26, 2011. The upcoming Council decision on April 26 is only a decision to list the issues on the formal docket and to then proceed with the process of evaluation, discussion, and recommendation by the city staff and Planning Commission in a public hearing. This is not the final decision point on any of the Amendment items themselves.

After the Council adoption of the final docket, the Planning Commission will then review all 4 docket requests at a formal public hearing this summer and provide a final recommendation on each item to the Council this fall, including how they might impact the Comprehensive Plan and policies and the associated development and design regulations. Per the city code, CMC 14.25, the City Council must then hold a formal hearing and make a final decision prior to December 31, 2011. Thus, there are several future opportunities for public input on this topic prior to any final decision by the Council.

ALTERNATIVES:
1.) Request additional information or input from staff or the Planning Commission.

FISCAL IMPACT:
None.

CITY COUNCIL ACTION: _____Ordinance _____Resolution _____Motion  X  Other

NO FORMAL ACTION REQUIRED.

REVIEWED BY:  City Manager
This guide is intended to explain the comprehensive plan amendment process pursuant to City of Covington Municipal Code Chapter 14.25 and to provide guidance in completing an application for such an amendment. Also included in these instructions is the current year’s timeline of specific dates and deadlines. Please direct any questions regarding this process to the Department of Community Development, Strategic Planning Division, at 253-638-1110 or via e-mail to rhart@ci.covington.wa.us.

Purpose
The comprehensive plan is a document which guides the nature and intensity of development in the City of Covington. An amendment to the plan is a mechanism by which the city may periodically modify its land use, development, or growth policies to reinforce the role of the plan in guiding growth in our community. A comprehensive plan amendment may involve a related change in development regulations or the City’s zoning map. Any proposal for a related development regulation or zoning map amendment should be included on the comprehensive plan amendment application and is subject to the same procedures and timeline.

Application Period
The City Council will consider comprehensive plan amendments on an annual basis only (except for emergencies and certain other exemptions), as required by the State Growth Management Act (GMA). Applications to initiate an amendment may be submitted only during the period specified in the current year’s timeline, by the deadline indicated at the top of these instructions.

Note that proposals for changes to development regulations or the zoning map that do not require a comprehensive plan amendment follow the process outlined in Covington Municipal Code Chapter 14.27 and may be proposed at any time of the year.

Who May Apply?
Any person or entity (e.g., private citizens, groups, City departments, Planning Commission or City Council) may initiate a non site-specific amendment to the plan, i.e., a proposal to change the plan text language or a general modification of the City’s future land use map. Only property owners or their authorized agents may initiate a site-specific amendment to the Plan.

An individual or group may seek sponsorship of a non site-specific comprehensive plan amendment from the City Council if they feel that it has broad significance for the public good of the City. If the Council agrees to sponsor an amendment, the application fee is waived. A Council-sponsored amendment proposal must be submitted by the deadline date above.

Fee
The fee for a comprehensive plan amendment as of the 2008-2009 annual amendment process is $3,500, $500 of which is a non-refundable docketing fee. Please refer to the City’s current fee resolution for updated fees. Depending on the nature of the proposed amendment, a SEPA (environmental) checklist and additional applicable fee may be required before the application is considered by the Planning Commission.

Procedure
1. Application. To propose a comprehensive plan amendment, an individual should fill out the application form (available online and at City Hall), provide any required materials, and pay the application fee. A pre-application meeting with City staff is strongly encouraged prior to submittal of an application. The application must be submitted no later than 5 p.m. on the deadline date. Proposed amendments that are deemed complete become part of the preliminary “docket” (the list of proposed amendments to be considered).

2. Comment period. Within one week of the application deadline date, the City will solicit public comment on the preliminary docket by posting it on the City website and making it available at City Hall. The preliminary docket will include a description of each proposed amendment in non-technical terms. Interested citizens may submit comments or suggestions (supportive, opposing, clarifying) related to the proposed amendment. Comments or questions may be e-mailed to rcurran@ci.covington.wa.us or delivered to City Hall. Comments should be made within the two-week period as specified on the timeline.

3. Preliminary review and determination of final docket. The Community Development Director will briefly evaluate whether proposed amendments meet the selection/decision criteria below, and make a recommendation to the Planning Commission and City Council as to which proposals should be placed in the final docket. At its discretion, the City Council may hold a joint workshop with the Planning Commission to consider the recommendations. The Planning Commission will hold a public hearing and make a
formal recommendation to the Council, and the City Council will thereafter decide which amendment proposals will be included in the final docket.

4. Final review and decision. The Community Development Department staff will prepare a staff report for all amendment proposals placed in the final docket. The Planning Commission will evaluate the proposed amendments, hold a public hearing, and make a recommendation to the City Council. The Council will consider the recommendation and make the final decision to approve, deny, or modify the proposed comprehensive plan amendments and any related development regulation amendments.

Selection/Decision Criteria
(1) Proposed amendments that meet one of the following criteria will be included on the preliminary docket for Planning Commission/Council consideration:

(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.

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

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

(2) Proposed amendments that do not meet one of the criteria in (1) must meet all of the following criteria in order to be placed in the preliminary docket:

(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.

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

(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.

(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.

(e) The proposed amendment is consistent with the comprehensive plan and other goals and policies of the City, the King County Countywide Planning Policies, the Growth Management Act, other state or federal law, the Washington Administrative Code and other applicable laws.

Completing the Application
Requests for amendments must be submitted by the deadline date on the application form provided by the Department. The applicant must provide all information requested on the application and answer with as much detail as possible as to how the proposal meets the selection/decision criteria.

A. Contact Information
Give the name and contact information of the applicant. If a lawyer or group is acting on behalf of or jointly with the applicant, complete agent contact information. Indicate the primary contact person. For site-specific amendments only, also complete contact information for property owner(s).

B. Amendment Type
Indicate whether the proposed amendment is site-specific (involving only one or two properties), or is area-wide or a change to the text of the comprehensive plan.

C. Site-Specific Amendments
Provide proposed language for a change to the text of the comprehensive plan (and to the text of development regulation(s) if applicable).

D. Area-wide and Textual Amendments
Provide proposed language for a change to the text of the comprehensive plan (and to the text of development regulation(s) if applicable).

E. Section/Decision Criteria
Provide detailed information as to how the proposed amendments meet the selection/decision criteria.

F. Costs and Benefits, Additional Information
Provide information on the costs and benefits to the public, both monetary and non-monetary, and describe any additional information that supports the proposed amendment.

G. Signature
The applicant or the applicant’s agent must sign the application, indicating that these instructions have been read and that the information provided on the application is true and correct. Property owners applying for site-specific amendments must also sign and have notarized a Property Owner Declaration.
December, 2010
- City gives public notice of comprehensive plan amendment application submittal period and deadline.
- 2011 Instruction Guide & Application made available online and at City Hall.

December, 2010
- Citizens are introduced to the comprehensive plan amendment process via website or consultation with city staff.
- Citizens may request a pre-application meeting for guidance in the comprehensive plan amendment process.
- City staff are informed and encouraged to prepare CPA’s as needed or recommended by their departments.

December 15, 2010—February 1, 2011
- Comprehensive plan amendment applications accepted for placement in preliminary docket.

February 15, 2011
- Preliminary docket prepared and posted for comment on City website and at City Hall.

February 15—March 1, 2011
- Public comments accepted by mail, e-mail, and public testimony.

March 4, 2011
- Public comments posted to preliminary docket.
- Community Development Director identifies proposed amendments that meet the selection criteria and makes recommendation to Planning Commission as to which should be included in the final docket.
- Applicants notified regarding requirements for SEPA checklist and

March 8-March 22, 2011
- Planning Commission and City Council may hold optional joint workshop to serve as an informational meeting on the amendment process and to hear Director’s recommendations for inclusion in the final docket.

By April 7, 2011
- Planning Commission holds public hearing on the selection and recommendation of proposed amendments for the final docket.

By April 26, 2011
- City Council considers PC recommendation and votes on final docket.

By June 16, 2011
- If needed, environmental checklist and/or other analysis completed and submitted to SEPA official, who issues determination.
- Director completes staff report for proposed amendments on final docket and gives 10 days notice of public hearing to applicants, citizens, and interested parties (14 days for proposed zoning changes).
- Public hearing held before Planning Commission.

By July 7, 2011
- Planning Commission makes recommendation to City Council.

By July 21, 2011
- Recommended comprehensive plan amendments and accompanying development regulations forwarded to CTED for required 60-day review period prior to final action.

By October 25, 2011
- City Council takes final action on comprehensive plan amendments and any related development regulation and zoning map amendments.

By September 27, 2011
- City Council holds public hearing. If City Council requests substantial changes to the amendments, the City Council will schedule an additional noticed public hearing for public comment.
## COMPREHENSIVE PLAN AMENDMENT APPLICATION

**2011 Application Deadline: February 1, 2011**

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<thead>
<tr>
<th>STAFF USE ONLY</th>
<th>Docket Number: CPA-2011-1</th>
<th>Application Date: 1-20-11</th>
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<td>X □ City-initiated</td>
<td>□ Privately-initiated</td>
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### APPLICANT
- **Name:** Richard Hart
- **Address:** City of Covington
- **Phone:** (253) 638-1110 Ext.2226
- **E-mail Address:** rhart@ci.covington.wa.us

### AGENT
- **Name:**
- **Address:**
- **Phone:**
- **E-mail Address:**

### PROPERTY OWNER
- **Name:** Various property owners, as this Non-Site Specific Comp Plan Policies Amendment affects a variety of land owners within the designated shoreline jurisdiction in the City of Covington.
- **Address:**
- **City/State/Zip:** All zoning districts in Covington

### TYPE OF COMPREHENSIVE PLAN AMENDMENT
- □ This is a *site-specific* amendment proposal. **Complete** site-specific information below.
- **X** This is a *non-site-specific* amendment proposal. **Complete** area-wide/textual amendment information below.

This amendment proposal involves additions to the existing Environmental Element of the Comprehensive Plan, Chapter 7.

### SITE-SPECIFIC AMENDMENTS
- **ADDRESS(ES):** (NA)
- **ASSESSOR’S PARCEL NUMBER(S):**
- **SITE AREA:**
- **LEGAL DESCRIPTION(S):**

- □ **PROPOSED CHANGE TO FUTURE LAND USE MAP DESIGNATION:** FROM ________ (CURRENT) TO ________ (PROPOSED)
Chapter and section of comprehensive plan to be amended: Add a new Ch. 13 Shoreline Element

Indicate either conceptual or specific amendatory language. Please be as specific as possible to aid in the evaluation of your proposal. If specific changes are proposed, please indicate current language and proposed language.
Currently the Environmental Element contains no specific shoreline goals, policies, environmental designations, or development regulations. The existing Environmental Element contains critical area policies and related natural resource stewardship policies. This amendment will create a new Element, a Chapter 13, for Shorelines and identify specific overall goals and policies related to the RCW required Shoreline Master Program (SMP) and adopt by reference the complete SMP. The complete SMP document is available from the City of Covington for review as part of this Comp Plan Amendment.

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<th>AREA-WIDE &amp; TEXT AMENDMENTS</th>
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<td>Chapter and section of comprehensive plan to be amended: Add a new Ch. 13 Shoreline Element</td>
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<th>DESCRIBE HOW PROPOSAL MEETS DECISION CRITERIA</th>
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<td>An amendment may be considered for placement on the final docket under any one of the following circumstances. Check the applicable box, and describe in detail how the proposed amendment complies with the criterion. Attach additional sheets as necessary.</td>
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☐ 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.

☐ State law requires, or a decision of a court or administrative agency has directed such a change. State law requires all local governments to have an updated Shoreline Master Program and goals, policies and regulations in their Comprehensive Plans and Development Regulations by June 30, 2011. This action will comply with the Comp Plan portion of that requirement.

☐ There exists an obvious technical error in the pertinent comprehensive plan provision. There are no Shoreline goals and policies in the current Comprehensive Plan as required by law. This adds a new Element Ch. 13 to address state requirements.
If none of the three conditions on p. 2 apply, then the proposed amendment must meet all five of the following criteria. Please answer the following questions, providing specific details and attaching additional sheets as necessary.

1. Explain how the proposed amendment is appropriately addressed through the comprehensive plan and how it would be a public benefit to the City of Covington (i.e. enhances the public health, safety, and welfare).

   *Currently the Comprehensive Plan has no goals policies relating to the Shoreline Master Program.*

   *The public benefits by having specific shoreline policies in the Comprehensive Plan.*

2. Proposed amendments that are the same or substantially-similar to an amendment proposed during the last three amendment cycles are not eligible for consideration, except in certain cases due to geographic expansion by the City (see CMC 14.25.040(3)). Has the same or a substantially-similar amendment been proposed during the last three annual amendment cycles?  

   X No  □ Yes

   If yes, how has geographic expansion necessitated the proposed amendment?

   __________________________________________________________________________________________

   __________________________________________________________________________________________

   __________________________________________________________________________________________

3. Does the proposed amendment raise any policy or land-use issues that are more appropriately addressed by an ongoing work program approved by the City Council?  

   X No  □ Yes

   Please explain:

   *The proposed changes need to be addressed with new policy and text language in some location within the Comprehensive Plan. A new Shoreline Element is the most logical solution. These goals, policies and guidelines are not within a annual work program. Of any department of the City.*

4. Explain how 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.

   *The last changes to the Comprehensive Plan had no such policies, and the City has not ever amended its Shoreline Master Program since adopting by reference the King County shoreline policies upon incorporation in 1997.*
5. Explain how the proposed amendment is consistent with:

(a) The vision, goals, and policies of the comprehensive plan, and other goals and policies of the City:

The proposed goals and policies will support the Land Use, Environmental and Natural Hazards Elements expressed in the Comprehensive Plan. The proposed Comprehensive Plan text amendments will strengthen the stewardship of natural resources and vision for the whole community, which in turn support the overall vision and the Plan.

(b) The Countywide Planning Policies, the Growth Management Act, State Environmental Policy Act (SEPA), the Washington Administrative Code, and other applicable state and federal laws.

The proposed changes outlined above are consistent with Countywide Planning Policies, the Growth Management Act, SEPA and WAC for sustainable growth and development as well as stewardship and protection of shoreline areas within the community. This Comprehensive Plan text amendment will also require a supplemental development regulation amendment to further define and modify the specific uses allowed in all shoreline jurisdictions of Covington. The development regulation amendment will be completed later this year or in 2012.

COSTS & BENEFITS / ADDITIONAL INFORMATION

1. Describe the effects of the proposed amendment in terms of costs and benefits to the public, both monetary and non-monetary.

Since the proposed changes for the Shoreline Master Program in relation to land use goals and policies, development patterns, and intensity of development, will strengthen the preservation of natural resources, they will be more cost effective and efficient in the long-term.

2. Describe and/or attach any studies, research information, or further documentation that will support this proposal.

The City completed a new Shoreline Master Program with an Inventory and Analysis of Shoreline Areas, Goals and Policies, and a Restoration Plan. These documents are available from the city and support the Comp Plan Amendment proposed.

CERTIFICATION / SIGNATURE

I have reviewed the Comprehensive Plan Amendment Instruction Guide and Timeline, and certify that the information provided on this application is true and correct.

__________________________________  __________________________
Applicant’s/Agent’s Signature             Date

Please note: If this is a site-specific amendment proposal, all affected property owners must complete, sign, and have notarized a Property Owner Declaration.
13.0 SHORELINE ELEMENT

13.1 Introduction

Pursuant to the Growth Management Act (GMA) and the Shoreline Management Act (SMA), the City of Covington Shoreline Master Program (SMP) in its entirety is an element of the Comprehensive Plan. This chapter provides a brief summary of the SMP. Please refer to the complete SMP on file with the City Clerk and adopted by reference with this Chapter of the Comprehensive Plan for more detailed policy and regulatory guidance. Where a conflict exists between the language in this summary and that contained in the SMP, the latter shall apply.

The City of Covington (City) obtained a grant from the Washington Department of Ecology (Ecology) in 2007 to conduct a comprehensive Shoreline Master Program (SMP) update pursuant to the requirements contained in the Shoreline Master Program Guidelines (Chapter 173-26 WAC), hereafter referred to as The Guidelines. The first step of the update process was to inventory the City’s shoreline jurisdiction as defined by the SMA (RCW 90.58). Biological and physical conditions were then analyzed and characterized in the Covington Shoreline Analysis Report. This created a baseline from which future development actions in the shoreline will be measured. Environment designations were then identified for the different shoreline reaches, and goals, policies and regulations were developed.

The Guidelines require that the City demonstrate that implementation of the SMP will result “no net loss” in shoreline ecological functions relative to the baseline. Ideally, the SMP in combination with other City and regional efforts will ultimately produce a net improvement in shoreline ecological functions.

The purposes of this Master Program are:

1. To carry out the responsibilities given to the City of Covington by the Washington State Shoreline Management Act (RCW 90.58)
2. Promote the public health, safety, and general welfare, by providing a guide and regulation for the future development of the shoreline resources of the City of Covington.

3. To further, by adoption, the policies of RCW 90.58, and the goals of this Master Program.

13.2 Planning Context

The goals and policies of the Shoreline Master Program reflect the requirements of the Shoreline Management Act, the Washington State Department of Ecology Shoreline Master Program Guidelines (Chapter 173-26 WAC) and the preferences and vision of the City of Covington as expressed in this Comprehensive Plan.

Washington’s Shoreline Management Act (Act) was adopted by the public in a 1972 referendum “to prevent the inherent harm in an uncoordinated and piecemeal development of the state’s shorelines.” The Act has three broad policies:

1. Encourage water-dependent uses: "uses shall be preferred which are consistent with control of pollution and prevention of damage to the natural environment, or are unique to or dependent upon use of the state's shorelines..."

2. Protect shoreline natural resources, including "...the land and its vegetation and wildlife, and the water of the state and their aquatic life..."

3. Promote public access: “the public’s opportunity to enjoy the physical and aesthetic qualities of natural shorelines of the state shall be preserved to the greatest extent feasible consistent with the overall best interest of the state and the people generally."

This Act recognizes that "shorelines are among the most valuable and fragile" of the state's resources. The Act, and the City of Covington, recognize and protect private property rights along the shoreline, while aiming to preserve the quality of this unique resource for all state residents.

The primary purpose of the Act is to provide for the management and protection of the state's shoreline resources by planning for reasonable and appropriate uses. In order to protect the public interest in preserving these shorelines, the Act establishes a coordinated planning program between the state and local jurisdictions to use in addressing the types and effects of
development occurring along the state's shorelines. By law, the City is responsible for the following:

1. Development of an inventory of the natural characteristics and land use patterns along shorelines covered by the act.

2. Preparation of a "Master Program" to determine the future of the shorelines.

3. Development of a permit system to further the goals and policies of both the act and the local Master Plan.

4. Development of a Restoration Plan that includes goals, policies and actions for restoration of impaired shoreline ecological functions.

The provisions of the Shoreline Master Program may be amended as provided for in RCW 90.58.120 and .200 and Chapter 173-26 WAC. Any amendments shall also be subject to the procedures in CMC Chapter 14.25. Amendments or revisions to the Master Program, as provided by law, do not become effective until approved by both the City of Covington and the Department of Ecology.

13.3 Shoreline Jurisdiction and Environment Designations

The SMP only applies to those areas within shoreline jurisdiction. Shoreline jurisdiction in the City of Covington includes the waters and upland area within 200 feet of the ordinary high water mark of the lower reaches of Big Soos Creek and Jenkins Creek, and those portions of Pipe Lake within the City. In addition, associated wetlands and portions of the floodplain are also included as described in the SMP. Figure 13.1 shows those areas believed to fall within Shoreline jurisdiction, however, the actual definition contained in the SMP and SMA shall apply, regardless of the mapped extent.

The basic intent of shoreline environment designations is to encourage development that will enhance the present or desired character of the shoreline. To accomplish this, shoreline segments are given an environment designation based on existing development patterns, biological capabilities and limitations, and the aspirations of the local citizenry. Environment designations are categories that reflect the overall type of development that should take place in a given area.
Shoreline environments are derived from the *Covington Shoreline Analysis Report*, the *Covington Comprehensive Plan*, and the environments recommended by the Shoreline Management Act (RCW 90.58) and the Shoreline Guidelines (Chapter 1783-26 WAC). *The Shoreline Analysis Report* provides an inventory of natural and built conditions in the City’s shoreline jurisdiction. The conditions identified in the inventory have been compared with the recommended shoreline environments and the most appropriate environments selected.

The five (5) Covington shoreline environment designations are:

1. High-Intensity,
2. Medium-Intensity,
3. Shoreline Residential,
4. Urban Conservancy, and
5. Aquatic.

These shoreline environments are illustrated for the City of Covington in Figure 13.1, located at the end of this chapter, and described in the text below. Each shoreline description includes a statement of purpose, followed by designation criteria and designated areas. Any undesignated shorelines are automatically assigned an Urban Conservancy environment. Please see the complete SMP for the entire list of management policies and regulations pertaining to the shoreline environments.

### 13.3.1 High Intensity

The purpose of the High-Intensity environment designation is to provide for high-intensity water-oriented and non-water oriented commercial, transportation, and industrial uses while protecting existing ecological functions and restoring ecological functions in areas that have been previously degraded.

**Designation criteria:** assign a High-Intensity environment designation to shoreline areas within incorporated municipalities and urban growth areas, if they currently support high-intensity uses related to commerce, transportation or navigation; or are suitable and planned for high-intensity water-oriented uses.

**Designated areas:** the only High-Intensity area is that portion of Jenkins Creek adjacent to the Bonneville Power Authority utility site as shown in Figure 13.1. Specifically, the High-Intensity area includes the shorelands of Jenkins Creek from the City boundary, upstream to the eastern edge of the public right-of-way that contains the bridge at Covington Way SE.
13.3.2 Medium Intensity

The purpose of the Medium-Intensity environment designation is to provide for water oriented and non-water oriented commercial, mixed-use, and residential uses while protecting existing ecological functions and restoring ecological functions in areas that have been previously degraded. Adaptive reuse of existing structures for office uses is emphasized, along with public access and water-enjoyment uses.

Designation criteria: assign a Medium-Intensity environment designation to shoreline areas if they currently support residential, water-enjoyment or commercial uses, are located in upland areas outside of stream buffers, and are suitable and planned for limited intensity commercial, residential or water-enjoyment uses.

Designated areas: shoreline areas located outside of the 115 foot stream buffer along Jenkins Creek have a Medium-Intensity environment designation as shown in Figure 13.1. These areas include shorelands located at least 115 feet from the OHWM of Jenkins Creek up to 200 feet from the OHWM of Jenkins Creek, and beyond to the boundary of any associated wetlands where these are found to exist. The linear extent of the Medium-Intensity environment extends to the eastern edge of the right of way that contains the Covington Way SE bridge, upstream to the point where two tributaries join and the 20 cubic feet per second mean annual threshold is no longer met. This designation runs parallel to an Urban Conservancy designation for shorelands adjacent to Jenkins Creek that meet the designation criteria.

13.3.3 Shoreline Residential

The Shoreline Residential environment designation is designed to provide for residential needs where the necessary facilities for development can be provided. An additional purpose is to provide appropriate public access and recreational uses.

Designation criteria: assign a Shoreline Residential environment designation to shoreline areas if they are predominantly single-family or multifamily residential development or are planned and platted for residential development.

Designated areas: Shoreline Residential areas in Covington include those areas adjacent to Pipe Lake that are currently developed as single family or appurtenances, where that use is anticipated to continue in the future. Specifically, the Shoreline Residential
environment includes all Pipe Lake shorelands with Covington City limits, with the exception of the Camp McCullough property.

13.3.4 Urban Conservancy

The purpose of the High-Intensity environment designation is to provide for high-intensity water-oriented and non-water oriented commercial, transportation, and industrial uses while protecting existing ecological functions and restoring ecological functions in areas that have been previously degraded.

The purpose of the Urban Conservancy environment designation is to protect and restore ecological functions of open space, flood plain and other sensitive lands where they exist in urban and developed settings, while allowing a variety of compatible uses.

**Designation criteria:** areas designated Urban Conservancy are those areas where one or more of the following characteristics apply:

1. They are suitable for water-related or water-enjoyment uses;

2. They are open space, flood plain, stream buffer or other sensitive areas that should not be more intensively developed;

3. They have potential for ecological restoration;

4. They retain important ecological functions, even though partially developed; or

5. They have the potential for development that is compatible with ecological restoration.

**Designated areas:** Urban Conservancy areas includes all shorelands adjacent to Big Soos Creek and shorelands adjacent to Jenkins Creek upstream or eastern edge of the Covington Way SE bridge right-of-way and at Pipe Lake on the Camp McCullough property where open space, stream buffers and other sensitive lands exist as shown in Figure 1.

Please note: where the Urban Conservancy designation exists along Jenkins Creek, a “parallel designation” of Medium-Intensity is located in upland areas beyond the 115 foot stream buffer.
13.3.5 Aquatic

The purpose of the Aquatic environment designation is to protect, restore, and manage the unique characteristics and resources of the areas waterward of the ordinary high-water mark.

**Designation criteria:** assign an Aquatic environment designation to all areas waterward of the ordinary high-water mark.

**Designated areas:** Aquatic areas include all areas waterward of the ordinary high-water mark as shown in Figure 13.1.

13.3 Shoreline Master Program Goals and Policies

The following section contains key goals and policies from the Shoreline Master Program. **This is an abbreviated list; please see the full text of goals, policies, environment designations and regulations in the complete Shoreline Master Program, which are hereby incorporated by reference.**

13.3.1 Shoreline Use and Modifications

**SMPG 1.0** The application of master program policies and regulations to all uses and related modifications shall assure no net loss of ecological functions necessary to sustain shoreline natural resources within the Covington SMA.

**SMPP 1.1** All development and redevelopment activities within the City’s shoreline jurisdiction should be designed to ensure public safety, enhance public access, protect existing shoreline and water views and achieve no net loss of shoreline ecological functions.

**SMPP 1.2** Water oriented uses shall be given preference over non-water oriented uses.

**SMPP 1.3** New residential development should be designed to protect existing shoreline water views, promote public safety, and avoid adverse impacts to shoreline habitats.

**SMPP 1.4** Recognizing the single purpose, irreversible and space consumptive nature of shoreline residential development, new development
should provide adequate setbacks and natural buffers from the water and ample open space among structures to protect natural features, preserve views and minimize use conflict.

SMPP 1.5 Proposed economic use of the shoreline should be consistent with Covington’s Comprehensive Plan. Conversely, upland uses on adjacent lands outside of immediate SMA jurisdiction (in accordance with RCW 90.58.340) should be consistent with the purpose and intent of this master program as they affect the shoreline.

SMPP 1.6 Road and bridge construction or expansion in the shoreline jurisdiction should be avoided, unless necessary to serve a permitted shoreline use or found to be within the public interest.

SMPP 1.7 New stream crossings associated with transportation should be minimized. Where necessary culverts or bridges should be designed to provide for stream functions such as fish passage and accommodate the flow of water, sediment and woody debris during storm events.

SMPP 1.8 New primary utilities are discouraged in the SMA jurisdiction and should utilize existing transportation and utility sites, rights-of-way and corridors whenever possible, rather than creating new corridors. Joint use of rights-of-way and corridors should be encouraged.

SMPP 1.9 Low Impact Development (LID) and “Green Building” practices, such as those promulgated under the Leadership in Energy and Environmental Design (LEED) and Green Built programs should be encouraged and in some cases required for new development within the shoreline jurisdiction.
SMPP 1.10 Shoreline stabilization should be permitted only when it has been demonstrated that shoreline stabilization is necessary for the protection of existing legally established structures and public improvements, and that there are no other feasible options to the proposed shoreline stabilization that have less impact on the shoreline environment.

SMPP 1.11 New piers and docks should be restricted to the minimum size necessary and permitted only when the applicant has demonstrated that a specific need exists to support the intended water-dependent use.

13.3.2 Shoreline Conservation

SMPG 2.0 Preserve, protect, and restore to the greatest extent feasible the natural resources of the shoreline, including but not limited to scenic vistas, aesthetics, and vital riparian areas for wildlife protection.

SMPP 2.1 Protect shoreline process and ecological functions through regulatory and non-regulatory means that may include acquisition of key properties, conservation easements, regulation of development within the shoreline jurisdiction, and incentives to encourage ecologically sound design.

SMPP 2.2 Reclaim and restore areas which are biologically and aesthetically degraded to the greatest extent feasible while maintaining appropriate use of the shoreline.

SMPP 2.3 Preserve and enhance vegetation along shorelines to protect and restore the ecological functions and ecosystem-wide processes performed by upland and aquatic vegetation. Native plant communities within the shoreline environment should be protected and maintained. All clearing and grading activities should be designed and conducted to avoid and minimize impacts to
wildlife habitat; sedimentation of creeks, streams, ponds, lakes, wetlands and other water bodies; soil hydrology and water quality

SMPP 2.4 All shoreline uses and activities should be located, designed, constructed and maintained to minimize adverse impacts to water quality and fish and wildlife resources including spawning, nesting, rearing, and feeding areas and migratory routes.

SMPP 2.5 Identify, protect, preserve and restore important archaeological, historical and cultural sites located in shoreline jurisdiction of Covington for their educational and scientific value, as well as for the recreational enjoyment of the general public.

13.3.3 Public Access and Recreation

SMPG 3.0 Increase the amount and diversity of public access to the shoreline, and preserve and enhance views of the shoreline, consistent with the natural shoreline character, private rights and public safety.

SMPP 3.1 Ensure new public access does not adversely affect the integrity and character of the shoreline, or threaten fragile shoreline ecosystems by locating new access points on the least sensitive portion of the site and providing mitigation so there is no net loss of shoreline function.

SMPP 3.2 Public access provisions should be required for all shoreline development and uses, except for water dependent uses, existing single family dwellings, and new individual single family residences not part of a development planned for more than four parcels.

SMPP 3.3 Recreational facilities in the shoreline jurisdiction should emphasize water-oriented uses.
SMPP 3.4 Public access provisions should be required for all shoreline development and uses, except for water dependent uses and individual single family residences not part of a development planned for more than four parcels.

SMPP 3.5 Camp McCullough represents a particularly important public access opportunity given its location on Pipe Lake, the current use as a private recreation facility, and the high ecological functions of the site. Ensure continued recreational use of the property and consider possible future public access through an agreement, easement, or acquisition in the event of future development and conversion to a non-recreational use.

SMPP 3.6 Provide and enhance shoreline access to Jenkins Creek and Big Soos Creek through fee simple acquisition, easements, signage of public access points, and designation and design of specific shoreline access areas for wildlife viewing.
Figure 13.1. Shoreline Environment Designations Map

[ Map to be inserted -- Page left intentionally blank ]
### COMPREHENSIVE PLAN AMENDMENT APPLICATION

**2011 Application Deadline: February 1, 2011**

<table>
<thead>
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<td>1-20-11</td>
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</table>

**X □ City-initiated   □ Privately-initiated**

#### APPLICANT
- Name: Parks and Recreation Department
- Address: 16720 SE 271st Street, Suite 100
- City/State/Zip: Covington, WA 98042
- Phone: x3279
- E-mail Address: sthomas@ci.covington.wa.us
- Signature: 

#### AGENT
- Name: Scott Thomas
- Address: 
- City/State/Zip: 
- Phone: 
- E-mail Address: 
- Signature: 

#### PROPERTY OWNER
- Name: NA
- Address: 
- City/State/Zip: 
- Phone: 
- E-mail Address: 
- Signature: 

#### PROPERTY OWNER 2
- Name: 
- Address: 
- City/State/Zip: 
- Phone: 
- E-mail Address: 
- Signature: 

#### TYPE OF COMPREHENSIVE PLAN AMENDMENT
- □ This is a site-specific amendment proposal. Complete site-specific information below.
- □ This is a non-site-specific amendment proposal. Complete area-wide/textual amendment information below.
- □ This amendment proposal involves changes to development regulation text and/or tables and/or changes to the zoning map. Complete a separate Application for Development Regulation and/or Zoning Map Amendment.

#### SITE-SPECIFIC AMENDMENTS
- Give street address or, if vacant, indicate lot(s), block, and subdivision OR tax lot number, access street and nearest intersection. If proposal applies to several parcels, list the streets bounding the area.
- □ PROPOSED CHANGE TO FUTURE LAND USE MAP DESIGNATION: FROM ________ (CURRENT) TO _______ (PROPOSED)
- □ PROPOSED CHANGE TO OFFICIAL ZONING MAP DESIGNATION: FROM ________ (CURRENT) TO ________ (PROPOSED)
Chapter and section of comprehensive plan to be amended: **Chapter 6, Parks and Community Services**

Indicate either conceptual or specific amendatory language. Please be as specific as possible to aid in the evaluation of your proposal. If specific changes are proposed, please indicate current language and proposed language.

The Parks and Community Services Element was last updated in 2003. Many conditions in the city have changed over the last seven years. This amendment incorporates information developed during the Parks, Recreation and Open Space (PROS) Plan process and synchronizes the PROS Plan and the Comp Plan — the two primary guidance documents for the department.

### AREA-WIDE & TEXT AMENDMENTS

An amendment may be considered for placement on the final docket under any one of the following circumstances. Check the applicable box, and describe in detail how the proposed amendment complies with the criterion. Attach additional sheets as necessary.

- [ ] 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.

- [ ] State law requires, or a decision of a court or administrative agency has directed such a change. State law requires a Parks Element, and it must be updated every 6 years and is due to be updated in 2013. A current updated Parks Element is also required for State funding for parks projects.

- [ ] There exists an obvious technical error in the pertinent comprehensive plan provision.
If none of the three conditions on p.2 apply, then the proposed amendment must meet all five of the following criteria. Please answer the following questions, providing specific details and attaching additional sheets as necessary.

1. Explain how the proposed amendment is appropriately addressed through the comprehensive plan and how it would be a public benefit to the City of Covington (i.e. enhances the public health, safety, and welfare).

   This is a routine update of the Parks and Community Services Element of the Plan. As conditions change in the city over time, such as population and development of parks and trails, it is necessary to engage the public, review their priorities, and update the Comp Plan to reflect the nature and intensity of acquisition, development, maintenance and operation of the recreation and park system.

2. Proposed amendments that are the same or substantially-similar to an amendment proposed during the last three amendment cycles are not eligible for consideration, except in certain cases due to geographic expansion by the City (see CMC 14.25.040(3)). Has the same or a substantially-similar amendment been proposed during the last three annual amendment cycles?  

   X No  □ Yes

   If yes, how has geographic expansion necessitated the proposed amendment?

3. Does the proposed amendment raise any policy or land-use issues that are more appropriately addressed by an ongoing work program approved by the City Council?  

   X No  □ Yes

   Please explain:

   All policy and land-use issues contained in the amendment are the result of the 2009-2010 work plan and the PROS Plan. Policies have already been approved by the City Council by virtue of Council adoption of the PROS Plan. The policies now need to be incorporated into the Comp Plan.

4. Explain how 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.

   It has been over seven years since the Parks and Community Services Element was updated. Since that time the city population has grown by 2,790, a 19% increase. Areas with parks have been annexed, including Jenkins Creek Park, Covington Community (180th/240th) Park and the Aquatic Center. Park lands within and outside the city have been acquired. The PROS Plan assessed progress, reviewed goals, and updated policies to reflect current conditions. This amendment will incorporate the updated information in the Comp Plan.
5. Explain how the proposed amendment is consistent with:

(a) The vision, goals, and policies of the comprehensive plan, and other goals and policies of the City:

Our vision is for an “Unmatched quality of life.” Our mission calls on the City to “preserve and foster a strong sense of community.” And our goals include providing “parks and recreation…that emphasize and meet the needs of youth and families.” A thriving recreation and park system is essential to delivering our vision, mission and goals. The parks element is deemed in Ch. 1 of the Comp Plan as “necessary to achieve this Vision.” Updating the parks element with information developed for the PROS Plan keeps the Comp Plan relevant given the changed conditions over the last seven years.

(b) The Countywide Planning Policies, the Growth Management Act, State Environmental Policy Act (SEPA), the Washington Administrative Code, and other applicable state and federal laws.

This is an update of an existing element of the Covington Comprehensive Plan and will be consistent with the above required laws and plans.

---

**COSTS & BENEFITS / ADDITIONAL INFORMATION**

1. Describe the effects of the proposed amendment in terms of costs and benefits to the public, both monetary and non-monetary.

   Aside from staff time, there aren’t any substantial costs associated with updating the parks element. However, there are significant public benefits by directing staff towards implementing the highest priorities determined through the public engagement process of the PROS Plan and then incorporated into the Comp Plan.

2. Describe and/or attach any studies, research information, or further documentation that will support this proposal.


---

**CERTIFICATION / SIGNATURE**

I have reviewed the Comprehensive Plan Amendment Instruction Guide and Timeline, and certify that the information provided on this application is true and correct.

---

*Please note: If this is a site-specific amendment proposal, all affected property owners must complete, sign, and have notarized a Property Owner Declaration.*
6.0 PARKS AND RECREATION ELEMENT

6.1 Introduction

The purpose of the Parks and Recreation Element is to provide goals and policies that guide the acquisition, development and management of parks, natural areas, trails and recreation facilities and programs for the City of Covington. This Element is divided into seven sections to address planning context, service standards, community needs, goals and policies, and implementation.

The Parks and Recreation Element is derived from the community planning process and analysis used to develop the 2010 Parks, Recreation and Open Space (PROS) Plan, which is a companion document to this Element and is incorporated herein by reference. It provides an inventory of park and recreation facilities and programs in Covington; outlines services standards for parks and facilities; identifies near-term community recreation demand; and presents a strategy for providing additional facilities and programs to meet the needs of the City’s residents and visitors.

6.2 Planning Context

This section discusses legislative directives (including the GMA and the CPP) as well as the Parks and Recreation Element’s relationship to other Comprehensive Plan elements and other community plans.

6.2.1 Legislative Directives

Growth Management Act

While the Parks Element is considered an optional element under the GMA, park and recreation facilities are required to be included in the mandatory capital facilities plan element. The Act identifies 13 broad planning goals to guide the development of comprehensive plans and development regulations (codified in RCW 36.70A). Of these, three goals directly influence the development and implementation of the City’s parks, recreation and open space programs.
• 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. (RCW 36.70A.020(9))

• Protect the environment and enhance the state’s high quality of life, including air and water quality, and the availability of water. (RCW 36.70A.020(10))

• Identify and encourage the preservation of lands, sites, and structures, that have historical or archaeological significance. (RCW 36.70A.020(13))

This Parks and Recreation Element aims to meet the intent of the requirements outlined in the GMA and provide a clear direction toward the protection and expansion of recreation opportunities for the citizens of Covington.

Countywide Planning Policies

The King County Countywide Planning Policies state that an open space system should be provided and that physical and visual access to rivers, lakes, and streams should be protected throughout the county. The Parks, Open Space and Cultural Resources chapter of the King County Comprehensive Plan makes significant references to the King County Park, Recreation, and Open Space Plan adopted in 2004 and outlines 32 policy statements pertaining to the provision of regional parks, natural areas and resource lands. The plan notes the need for cooperation, coordination and partnerships with public agencies, private groups and individuals to develop the regional parks and open space system.

6.2.2 Relationship to Other Comprehensive Plan Elements

The vision, goals, policies and recommendations of the Parks and Recreation Element have all been coordinated with, and are supportive of, the framework that has been established in Covington’s Comprehensive Plan. This Element not only provides for the recreational needs of Covington’s residents, but also is supportive of a broader network of regional greenspace and trails to surround the community.

The Parks and Recreation Element functions in concert with the Environmental Element by establishing policies for the acquisition, development and management of City-owned natural areas. The Land Use Element is supported through policies aimed at the continued provision of facilities and services to support anticipated growth. In addition, the Parks and Recreation Element establishes
policies for the coordination of funding and level of service requirements set forth in the Capital Facilities Element.

6.2.3 Relationship to Other Parks and Recreation Plans

In preparing the Parks and Recreation Element, the park, trail and open space systems of the City of Kent, Maple Valley and King County were considered. The planning direction established by Washington’s Statewide Comprehensive Outdoor Recreation Planning (SCORP) program and RCW 36.70 also provided a regional basis for the Parks and Recreation Element. In addition, several planning documents and studies have been prepared since Covington incorporated in 1997 that have influenced parks and recreation service in the City. A summary of each of these is listed below.

2006 Covington Parks and Recreation Department Strategic Plan

This strategic plan is based in the Parks and Recreation Department’s mission, vision and values and has three major purposes: present a long-term vision of success to direct planning and management efforts; prioritize projects to focus funding and budgeting; develop a management process that considers existing commitments when new requests and initiatives are presented.

2006 Community Forestry Plan

This draft plan includes the City’s tree ordinance, tree establishment and maintenance procedures, a park and open space tree inventory and a 2007-2013 action plan. The Arbor Day program and the annual application to the Tree City USA membership program are highlighted as part of the educational component of the action plan.

2003 Arts Comprehensive Plan

This 6-year plan outlines the goals, objectives and performance measures for the Arts Commission and the Parks Department. The plan promotes the use and appreciation of the arts in the City’s activities and facilities, while assisting the City in meeting the planning requirements for potential funding sources.

2002 Comprehensive Recreation Program Plan

The plan outlines a specific focus for city recreation services and identifies key recreation policies and practices to facilitate service delivery. The plan lists the vision, guiding principles, goals,
implementation strategies and a pricing policy for recreational programming.

6.2.4 Community Vision for Parks & Recreation

The future vision for Covington’s park and recreation system is summarized as follows:

- **Covington is responsive to community needs.** The City will establish specialized recreation services and acquire additional parkland to meet the needs of its growing and diverse community. Partnering with other agencies, Covington will pursue opportunities and innovative solutions for new facilities and inclusive access to services.

- **Covington promotes active lifestyles, personal fitness and a greater sense of place and community.** Through joint marketing efforts and partnership development with regional health and fitness providers, Covington will strive to be one of the healthiest cities in Washington.

- **Covington is a walkable community with an expanded trails network connecting parks and natural areas with neighborhoods and downtown.** This includes a comprehensive system of on-road bicycle routes as well as off-road trails, so people have alternative transportation options and access to passive recreation opportunities for wellness and exploration.

- **Safe, attractive, well-kept parks and natural areas will be a key contributor to the city’s health and economic prosperity.** Community outreach and education will build awareness of the benefits of parks, trails and recreation, along with encouraging residents to participate in improving their park system.

6.2.5 Planning Area Description

The City of Covington is situated in King County, between the cities of Kent and Maple Valley and maintains a modest system of neighborhood and community parklands, along with providing an aquatic center and aquatics programming. Additionally, a significant number of small, private pocket parks and greenspaces have been added throughout the City as a result of significant new residential development over the past ten years.

Covington’s landscape character includes rolling foothills divided by three major creek drainages: Soos Creek, Little Soos Creek and Jenkins Creek. These drainage courses and forested slopes are among some of Covington’s most striking features. With the exception of the commercial town center, most of the community retains natural greenbelts, and the vegetation and topography of
these greenspaces offer a variety of recreational, aesthetic and educational opportunities which serve as the context for the Parks and Recreation Element.

6.3 Park System Definitions and Standards

This section provides information for adopted service standards and describes the following park classifications within the City:

- Community parks
- Neighborhood parks
- Pocket Parks
- Natural Areas & Greenspaces
- Trails & Bikeways
- Special Facilities

6.3.1 Community Parks

Community parks are larger sites developed for organized play, contain a wider array of facilities and, as a result, appeal to a more diverse group of users. Community parks are generally 20 to 50 acres in size, should meet a minimum size of 20 acres when possible and serve residents within a 1-mile radius of the site. In areas without neighborhood parks, community parks can also serve as local neighborhood parks.

In general, community park facilities are designed for organized or intensive recreational activities and sports, although passive components such as pathways, picnic areas and natural areas are highly encouraged and complementary to active use facilities. Since community parks serve a larger area and offer more facilities than neighborhood parks, parking and restroom facilities are provided. Community parks may also incorporate community facilities, such as community centers, senior centers or aquatic facilities.

6.3.2 Neighborhood Parks

Neighborhood parks are small park areas designed for unstructured play and limited active and passive recreation. They are generally 3 to 5 acres in size, depending on a variety of factors including neighborhood need, physical location and opportunity, and should meet a minimum size of 2 acre in size when possible.

Neighborhood parks are intended to serve residential areas within short walking distance (up to ½-mile radius) of the park and should
be geographically distributed throughout the community. Access is mostly pedestrian, and park sites should be located so that persons living within the service area will not have to cross a major arterial street or other significant natural or man-made barrier, such as ravines and railroad tracks, to get to the site. Additionally, these parks should be located along road frontages to improve visual access and community awareness of the sites.

Generally, developed neighborhood parks include amenities such as pedestrian paths, picnic tables, benches, play equipment, a multi-use open field for youth soccer and baseball, sport courts or multi-purpose paved areas, landscaping and irrigation. Restrooms are not provided due to high construction and maintenance costs. Parking is also not usually provided; however, on-street, ADA accessible parking may be included.

6.3.3 Pocket Parks

Pocket parks are very small and serve a limited radius (up to ¼-mile) from the site; they provide passive and play-oriented recreational opportunities. Examples of pocket parks can include a tot lot with play equipment such as a climber, slide or swings; a viewpoint; or waterfront access areas such as at street ends. A small urban plaza or civic recognition project may also be considered a pocket park. Parking is not provided at pocket parks, although lighting may be used for security and safety.

6.3.4 Natural Areas & Greenspaces

Natural areas

Natural areas are those which are preserved to maintain the natural character of the site and are managed to protect valuable ecological systems, such as riparian corridors and wetlands, and to preserve native habitat and biodiversity. In managing for their ecological value, these natural areas may contain a diversity of native vegetation that provides fish and wildlife habitat and embodies the beauty and character of the local landscape. Low-impact activities, such as walking, nature observation, and fishing are allowed, where appropriate, and horseback riding is also permitted on certain sites.

Greenspaces

Greenspaces are passive-use open spaces and turf areas without developed amenities or structured functions.
6.3.5 Trails & Bikeways

Trails
Trails are non-motorized transportation networks separated from roads. Trails can be developed to accommodate multiple uses or shared uses, such as pedestrians, in-line skaters, bicyclists and equestrians. Trail alignments aim to emphasize a strong relationship with the natural environment and may not provide the most direct route from a practical transportation viewpoint.

Bikeways
Bikeways are different than trails in that they are within road rights-of-way and their principal focus is on safe and efficient transportation routes. Bikeways serve distinctly different user groups than trail users. Typical bikeway user groups would include bicycle commuters, fitness enthusiasts and competitive athletes. Their emphasis is on speed, which can create conflicts with recreation-type trails and their respective user groups.

6.3.6 Special Facilities
Special facilities include single-purpose recreational areas such as skateparks and display gardens, along with community centers, aquatic centers and public plazas in or near the downtown core. Additionally, publicly-accessible sport fields and play areas of public schools are classified as special facilities; while they often serve as proxies to public parks, school sites have restricted daytime access and offer limited recreational use during non-school hours.

6.3.7 Service Standards
Service standards for park facilities are one recognized method of expressing the quantity of recreation service provided for a given level of demand. It is represented as a ratio of quantity versus demand, and it is commonly expressed as a number of acres or miles of facilities per a given population, such as 3 acres of neighborhood park per every 1,000 people or 0.75 miles of trail per 1,000 people.

Table 6.1 shows the adopted service standards for parks and recreational facilities, including trails, in Covington. It is important to bear in mind that the suggested standards are an expression of minimum acceptable facilities for the citizens of Covington. The service standards are a starting point for local level of service assessments. Only the four (4) service standards that will be
adopted for the purposes of funding in Chapter 10 (Capital Facilities Element) are presented in the section below.

### Table 6.1. Parks & Recreation Service Standards

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<td>Community Parks</td>
<td>20-50 acres; 20-acre minimum desired</td>
<td>up to 1-mile radius</td>
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<td>Neighborhood Parks</td>
<td>3-5 acres; 2-acre minimum desired</td>
<td>up to 1/2-mile radius</td>
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<td>Natural Areas &amp; Greenspace</td>
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<td>Trails &amp; Bikeways</td>
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<td>NA</td>
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*Neighborhood and pocket parks are combined for a service standard of 3 acres per 1,000 residents.*

### 6.4 Park Inventory and Facilities

This section provides a summary inventory and overview of Covington’s existing public and private developed parks, trails, and recreational facilities.

Covington provides nearly 170 acres of public parkland and natural areas distributed among 24 city-owned sites. A number of other public and private open spaces exist throughout Covington and add to the City’s recreation resources.

The major non-city, public open space is Soos Creek Park, a 731-acre regional park which partially lies within the western edge of the City's boundaries. This park forms a greenbelt that separates Covington from Kent and includes the Soos Creek Trail, a 1.4-mile multi-purpose trail with parallel equestrian trail. Lake Meridian Park, operated by the Kent Parks Department, is located immediately west of Soos Creek Park and is also heavily used by Covington residents.

Covington residents are also served by several small parks operated by homeowner associations as private parks. The largest privately-owned, publicly-accessible open space is Camp McCullough, a 38-acre Christian campground, located on the western shore of Pipe Lake.

Schools of the Kent and Tahoma School Districts provide additional open space and active recreation opportunities for area youth with athletic fields, tennis courts, basketball courts and playgrounds. Since the City does not own or operate any athletic
fields at the present, individual sports leagues work with each school district via use and maintenance agreements to facilitate practice and game play for local youth sport teams.

Table 6.2 summarizes the existing parks and facilities inventory by park type. The maps on the following pages (Figures 6.1 & 6.2) identify public parks, trails and natural areas managed by the City of Covington. A detailed inventory and assessment of existing parks, natural areas and recreational facilities is contained in the PROS Plan.

**Table 6.2. Park System Inventory by Type (Summary)**

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Figure 6.1. Existing City-owned Parks and Natural Areas

[ Map to be inserted -- Page left intentionally blank ]
Back of Figure 6.1.

[ Page Left Intentionally Blank ]
Figure 6.2. Existing Trails, Bikeways and Paths

[ Map to be inserted -- Page left intentionally blank ]
Back of Figure 6.2.

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6.5 Needs Assessment

This section summarizes the core needs resulting from a review of the park system, community feedback and stakeholder input. A summary of level of service (LOS) measurements for park and trail facilities is also provided.

6.5.1 Parks & Natural Areas

A gap analysis of the park system was conducted to examine and assess the current distribution of parks throughout the City. The analysis reviewed the locations and types of existing facilities, land use classifications, transportation/access barriers and other factors as a means to identify preliminary acquisition target areas. The gap analysis showed that much of the city lacks reasonable access to public parkland, with significant gaps in the west-central and eastern areas of the City. A total of nine potential acquisition areas were identified and discussed in more detail in the PROS Plan.

The greatest documented need is for additional community park sites to provide the land base for a blend of passive and active recreation opportunities, such as sport fields, picnicking and walking. The City should consider an acquisition along Pipe Lake to provide for these recreational needs and to also provide water access. Secondarily, new neighborhood parks are needed to improve overall distribution and equity, while promoting recreation within walking distance of residential areas. Also, the need for an urban plaza in the downtown core was identified, as was the need for the acquisition of natural area to connect current City ownership south of Jenkins Creek Park.

Regarding park development, the planned construction of the Covington Community Park will provide needed recreation opportunities and improve the City’s level of service. The redevelopment and renovation of Jenkins Creek Park as a second community park serving the City is also a noted priority. Although many Covington residents benefit from access to private, homeowner parks, the City should remain committed to developing additional neighborhood parks, especially for those residents not affiliated with private park amenities.

6.5.2 Sport Fields & Sport Courts

The City currently does not provide youth athletic programs, but it works in support of the various youth leagues and organizations with regard to field access and broad dialogue about long-term needs and facility planning. A significant deficit of sport fields
exists for local practice and game play, as well as for quality tournament play. To help address this need, the City should continue to facilitate discussions with area leagues and staff from Maple Valley and Black Diamond for the purposes of field planning and coordination, addressing geographic proximity of fields to the player base and for strategizing about long-term financing opportunities. In addition to the needs of the existing leagues, field demands exist for rugby, football and lacrosse which also should be considered.

Aside from field sport needs, a current deficiency and limited distribution of sport courts exist. School sites provide limited access to basketball courts, and no public tennis or volleyball courts exist within the City.

6.5.3 Trails

Currently many of the existing bicycle and pedestrian trails are limited in length, and few connect to the regional trail network, schools, parks or other key destinations. The pathway system is further hindered by physical barriers, such as SR-18, which bisects the City. The PROS Plan identifies the development of several trail segments and corridors in an effort to create a robust trail network that provides logical connections to key destinations and are convenient for the community to use. In support of an expanded trail network, the City should continue to pursue the purchase or dedication of access easements or greenspace corridors to facilitate linkages with existing trail segments.

6.5.4 Recreation Facilities & Programming

Community events, fitness programs and educational classes were ranked as the most desired programming options. While the City participates in Covington Days and other community events, such as the tree lighting and run/walk events, the City should consider incremental growth in recreation services to focus on programs not currently offered by local or regional providers, such as health and fitness education for youth and fall prevention programs for seniors. As the City considers offering more events, it should seek to share costs with private sponsors and develop a series of seasonal activities.

Past discussions regarding the development of a community recreation center were also reviewed in light of current community attitudes and potential operational challenges. One option includes the expansion of the Covington Aquatic Center. While this center can accommodate a second story for a fitness room, it would not
be large enough to accommodate extensive recreation programming or a teen center.

Recent discussions by city officials have expanded the concept of a recreation center to discuss the potential of a multi-jurisdictional facility to support residents of Covington, Maple Valley and Black Diamond. Such a facility would be jointly funded by the cities and/or require voter support from the wider area. Given the interest in recreation facility space for programming, it is recommended that an additional review of alternatives for providing recreation center “services” be performed, while addressing the initial financial considerations, understanding and modeling user demand and analyzing options for facility and program cost recovery.

6.5.5 Repair, Renovation & Safety Projects

A major theme from community planning process for the PROS Plan was that the maintenance and upkeep of public parklands is paramount to residents’ use and enjoyment of the facilities. Covington residents are keenly interested in the renovation of their parks and natural areas system. The desire for better and more consistent maintenance of parks and facilities, along with a variety of suggestions for specific site upgrades and enhancements suggests that the City’s park system must improve its facilities to establish the respect and patronage of its citizens. Several renovation projects are noted in the Capital Facilities Plan, with special attention toward improvements at Jenkins Creek Park.

6.5.6 Level of Service Assessment

A level of service (LOS) assessment was conducted as a means to understand the distribution of parkland acreage and trails by classification and for a broader measure of how well the City is serving its residents with access to these recreation amenities. Using the service standards discussed above, Table 6.3 illustrates the current and projected levels of service for parkland, natural areas and trails for Covington.
The current level of service for community parks is 2.9 acres per 1,000 residents, which includes the undeveloped properties of the Covington Community Park and Jenkins Creek. The current deficit of 37 acres is expected to grow to approximately 50 acres by 2020. A small current deficit exists for neighborhood parks, which is expected to grow to approximately 20 acres. The current level of service for natural areas is meeting the standard, but it is also expected to turn to a deficit in the coming 10 years.

The current level of service indicates a deficiency of over 8 miles of pathways and over 6 miles of bikeways; however, the pathway system expansion projects listed in the Capital Facilities Plan will help ameliorate some of this projected deficit and create a dynamic network of on-street and off-street pathways linking major destinations throughout Covington.

### 6.6 Goals and Policies

The following section presents the goals and policy statements that have been developed through the community planning process for the PROS Plan. These statements have been derived by analyzing the strengths and weaknesses of the existing park system; input of Covington residents’ responses to the Parks Survey; review and feedback from the Parks and Recreation Commission; national and local recreation trends and issues; and from identifying opportunities for strategic progress during the next 5 to 10 years.

#### 6.6.1 Community Engagement

PRG 1.0 Encourage meaningful public involvement in park and recreation planning and engage residents through department communications.
PRP 1.1 Involve residents and stakeholders in system planning, park site facility design and recreation program development to solicit community input, facilitate project understanding and engender public support.

PRP 1.2 Use a variety of methods and media to increase resident awareness about Parks and Recreation Department activities via community events, interpretive tours, presentations to neighborhood, homeowner and civic groups and other venues.

PRP 1.3 Expand and update the city’s web site to enhance citizen communication, expand access to information and improve public outreach and marketing.

PRP 1.4 Prepare and publish a comprehensive park and trail facilities map for online and print distribution to highlight existing and proposed routes and promoting Covington as an active-lifestyles community.

PRP 1.5 Host special events, festivals, concerts and cultural programming to promote wellness and community identity, foster civic pride and promote tourism and the benefits of recreation.

PRP 1.6 Expand community-based volunteer and stewardship development and improvements opportunities, such as planting and restoration activities, in conformance to established City standards.

PRP 1.7 Conduct periodic joint sessions between the Parks and Recreation Commission, City Council and other commissions to improve coordination and discuss policy matters of mutual interest.

6.6.2 Health, Wellness & Programming

PRG 2.0 Establish a varied and inclusive suite of recreation programs that accommodate a spectrum of ages, interests and abilities.
PRP 2.1 Leverage City resources by forming and maintaining partnerships with other public, non-profit and private recreation providers to deliver recreation services and secure access to existing facilities (e.g. schools) for field sports and other community recreation.

PRP 2.2 Emphasize service provision to children, teens, seniors, people with disabilities and other population groups with limited access to market-based recreation options.

PRP 2.3 Explore partnership opportunities with regional healthcare providers and services, such as MultiCare, Valley Medical Center and the King County Health Department, to promote wellness activities, healthy lifestyles and communications about local facilities and the benefits of parks and recreation.

PRP 2.4 Promote and expand special events and programming, such as summer programs and environmental education. Utilize the region’s parks, trails, waterfronts and recreation facilities as settings to provide and/or facilitate a wider array programs and activities.

PRP 2.5 Continue to foster the partnership with the Kent and Tahoma School Districts to utilize school sites to provide active recreation facilities. Explore opportunities to co-develop facilities on school property or property adjacent to schools.

PRP 2.6 Explore options with Maple Valley, Black Diamond and King County for the development of a joint community facility for recreation, fitness and leisure activities.

PRP 2.7 Periodically undertake a comprehensive evaluation of existing recreation program offerings in terms of persons served, customer satisfaction, cost/subsidy and availability of similar programs via other providers.
PRP 2.8 Study and create cost recovery guidelines for existing and planned recreation programs and services.

PRP 2.9 Coordinate with the Covington Art Commission to encourage participation in, appreciation of and education in the arts and to improve the capacity of local arts agencies in providing art programs that benefit community residents.

6.6.3 Parks, Natural Areas & Trails

PRG 3.0 Acquire and develop a high-quality, diversified system of parks, recreation facilities and open spaces that is attractive, functional, accessible and safe – providing equitable access to all residents.

PRP 3.1 All city residents should live within one-half mile of a developed neighborhood park and one mile of a developed community park.

PRP 3.2 Provide a combined service standard of 8 acres per 1,000 resident-equivalents of developed neighborhood and community parks.

PRP 3.3 Provide an overall parks and natural areas service standard of 14 acres per 1,000 resident-equivalents.

PRP 3.4 Preserve and protect parks and open space within Covington’s boundaries. Prepare and adopt a “no net loss” of public parks policy, such that the City will consider parkland losses only when converted parkland is replaced in equal to or better size and/or quality.

PRP 3.5 Designate parks, recreational areas, trails and natural areas to be of local or regional significance if they contain significant recreation or cultural opportunities or facilities, unusual or special botanical resources, environmentally sensitive areas that serve a significant role or provide a significant function in the natural systems within the City, or public art and are
associated in a significant way with an historic event, structure or person with a significant effect upon the City, state or nation.

PRP 3.6 Adopt plans, development and building regulations, and review procedures to protect locally or regionally significant parks, urban separators, and recreation and open space areas from adverse physical and environmental impacts caused by incompatible land uses in the vicinity of these resources.

PRP 3.7 Develop and implement minimum design and development standards for park and recreation amenities within private developments to maintain minimally-acceptable standards of development and to address community facility needs, equipment types, accessibility and installation procedures.

PRP 3.8 Identify and protect areas of local or regional significance and increase and enhance public access to shoreline areas.

PRP 3.9 Pursue low-cost and/or non-purchase options to preserve open space and greenbelts, including the use of conservation easements, current use assessment and development covenants.

PRP 3.10 Actively plan and coordinate with King County, Kent, Black Diamond and Maple Valley for the acquisition of parks and open space within or in close proximity to the urban growth area.

PRP 3.11 Encourage and support the participation of community-based or non-profit conservation organizations, which offer options and alternatives to development in the interest of preserving desirable lands as a public benefit.
PRG 4.0 Protect and manage the City’s environmentally-sensitive lands, remnant open spaces and natural and cultural resources to highlight their uniqueness and local history.

PRP 4.1 Retain as open space those areas having a unique combination of open space values, including the separation or buffering between incompatible land uses; visual delineation of the City or a distinct area or neighborhood of the City; aquifer recharge areas; floodwater or stormwater storage; stormwater purification; recreational value; aesthetic value; and educational value.

PRP 4.2 Retain and protect as open space those areas that provide habitat for rare, threatened or endangered plant or wildlife species, may serve as a corridor for wildlife movement, and may include and encourage public use for wildlife interpretation and observation.

PRP 4.3 Develop management plans for the City’s larger natural areas and greenspaces and facilitate community-based volunteer restoration. Plan for and manage the use of natural areas in coordination with the City’s Critical Areas Ordinance and other resource protection guidelines.

PRP 4.4 Manage vegetation in natural areas to support or maintain native plant species, habitat function and other ecological values; remove and control non-native or invasive plants as appropriate.

PRP 4.5 Coordinate with King County, Kent, Black Diamond and Maple Valley to explore opportunities to preserve and enhance the ecological function, habitat quality and recreational value of the Soos Creek, Little Soos Creek and Jenkins Creek corridors.

PRP 4.6 Coordinate with other public agencies and private landowners for the protection of valuable natural resources and sensitive
lands through the purchase of development rights, easements or title and make these lands available for passive recreation, as appropriate.

PRP 4.7 Recognize that designating private property for open space uses does not establish or promote any public access rights to such property.

PRP 4.8 Revise and adopt the draft Covington Community Forestry Plan to articulate a long-term strategy for tree protection, urban forestry management and public education and outreach.

PRP 4.9 Consider creating community-based volunteer and stewardship opportunities as a way to inform and engage residents about urban forestry issues, such as tree planting, tree care and management and the benefits of urban trees.

PRP 4.10 Analyze the City’s existing tree canopy cover, establish canopy cover goals and promote urban forestry programs in order to maintain healthy atmospheric conditions.

PRP 4.11 Establish and promote a recognition program for the City’s Heritage Trees.

PRP 4.12 Comply with the Evergreen Communities Act (RCW 35.105) and obtain and maintain Evergreen Community status.

PRP 4.13 Maintain Tree City USA status.

PRP 4.14 Promote the installation and management of street trees as an extension of urban habitat and providing green infrastructure benefits.

PRG 5.0 Develop a high-quality system of shared-use park trails and bicycle & pedestrian corridors that connect significant local landscapes, public facilities, neighborhoods and the downtown core.

PRP 5.1 Create a network of interconnected, shared-use trails for walking, hiking and cycling to
promote connectivity between parks, neighborhoods and public amenities.

PRP 5.2 Provide a trails service standard of 0.75 miles per 1,000 resident-equivalents.

PRP 5.3 Integrate the siting of proposed trail segments into the development review process. Require development projects along designated trail routes to be designed to incorporate the trail as part of the project.

PRP 5.4 Work with local agencies, utilities and private landholders to secure trail easements and access to greenspace for trail connections.

PRP 5.5 Require development projects along designated trail routes to be designed to incorporate the trail as part of the project. Sensitive area buffers within proposed subdivisions and short-subdivisions shall be widened to accommodate additional open space and a public easement for future trails.

PRP 5.6 Designate publicly-owned trails and City-dedicated easements on private lands as community trails and manage the use, maintenance and operation of each trail accordingly.

PRP 5.7 Coordinate with Burlington Northern Santa Fe Railroad for a potential rail-with-trail opportunity.

PRP 5.8 Coordinate with King County, Kent, Black Diamond and Maple Valley for the joint planning, development and maintenance of a regional pedestrian-bicycle trail system, to include linkages to the Soos Creek Trail, Lake Wilderness Trail, Cedar River Trail and the proposed SR-18 Trail.

PRP 5.9 Address pedestrian safety and access across Kent-Kangley Road, SR-18 and the railroad tracks.
PRP 5.10  Provide trailhead accommodations, as appropriate, to include parking, wayfinding signage, restrooms and other amenities.

6.6.4 Concurrency

PRG 6.0  Ensure that new park and recreational services are provided concurrent with new development.

PRP 6.1  New development shall provide funds or parkland for concurrent park development and maintenance.

PRP 6.2  Require on-site (or nearby off-site) development of recreation facilities or appropriate and usable parkland in conjunction with the approval of any development project involving more than 20 new dwelling units. The development of recreational amenities shall conform to the City’s minimum guidelines and the general needs outlined in this Plan. Fees in lieu of development may be accepted by the City if such mitigation is not practicable.

PRP 6.3  Mixed use development involving more than 20 new dwelling units in the downtown area shall be exempted from the requirement to develop on-site park, recreation or open space facilities. Instead, upon approval by the City, in lieu of fees may be accepted for such mixed-use developments, to be spent on designated park, recreation or open space resources within the City that serve the development.

PRP 6.4  New commercial development shall be responsible for financing and providing downtown amenities such as parks, open spaces and public art.

6.6.5 Management & Operations

PRG 7.0  Provide a parks, trails and open space system that is efficient to administer and operate, while providing a high level of user comfort, safety, aesthetic quality and protection of capital investment.
PRP 7.1  Provide sufficient financial and staff resources to maintain the overall parks system to high standards.

PRP 7.2  Maintain all parks and facilities in a manner that keeps them in safe and attractive condition; repair or remove damaged components immediately upon identification.

PRP 7.3  When developing new facilities or redeveloping existing facilities, review and consider the projected maintenance and operations costs prior to initiating design development. Emphasize the maintenance, enhancement and renovation of existing parks prior to the development of new facilities.

PRP 7.4  Formulate illustrative master plans for the development or redevelopment of each city park, as appropriate, to take maximum advantage of grant or other funding opportunities.

PRP 7.5  Design and maintain parks, trails and facilities to offer universal accessibility for residents of all physical capabilities, skill levels and age. All facilities shall conform to the American with Disabilities Act (ADA) guidelines and requirements.

PRP 7.6  Incorporate sustainable development and low impact design practices into the design, planning and rehabilitation of new and existing facilities. Prepare sustainability best management practices for grounds maintenance and operations. Consider the use of non-invasive, native vegetation for landscaping in parks and natural areas to minimize maintenance requirements and promote wildlife habitat and foraging.

PRP 7.7  Standardize the use of graphics and signage to establish a consistent identity at all parks, trailheads and other facilities.
PRP 7.8 Standardize park furniture (trash cans, tables, benches, fencing, water fountains) to reduce inventory costs and improve appearance of, and maintenance consistency within, parks.

PRP 7.9 Coordinate park planning, acquisition and development with other City projects and programs that implement the comprehensive plan. Seek partnerships with other public agencies and the private sector to meet the demand for cultural and recreational facilities in the City.

PRP 7.10 Encourage volunteer park improvement and maintenance projects from a variety of individuals, service clubs, scouting organizations, churches and businesses.

PRP 7.11 Periodically evaluate user satisfaction and numerical use of parks, facilities and programs; share this information with staff, Parks and Recreation Commission and City Council as part of the decision making process to revise offerings or renovate facilities.

PRP 7.12 Pursue alternative funding options for the acquisition and development of parks and facilities, such as through private donation, sponsorships, partnerships, county, state and federal grant sources, among others. Place priority on maximizing grants and other external sources of funding, or inter-agency cooperative arrangements, to develop the City’s park resources.

PRP 7.13 Promote professional development opportunities that strengthen the core skills and engender greater commitment from staff, Commission members and key volunteers, to include trainings, materials and/or affiliation with the National Recreation & Park Association (NRPA) and the Washington Recreation & Park Association (WRPA).
6.7 Implementation

The PROS Plan summarizes information found elsewhere in the Comprehensive Plan that is required as basic elements of a capital facilities plan under the GMA, including the inventory of existing facilities and a forecast of future needs. In addition, a table listing proposed new facilities with estimated acquisition and development costs can be found in the PROS Plan CIP. Additionally, park and recreation facilities are included in the Capital Facilities Element of the Comprehensive Plan (Chapter 10).

The total amount of funding to support the documented community demand for parks and recreation services exceeds the City’s current financial capacity. Since park projects and recreation services must compete for funds with many other vital City functions and services, the proposed park and trail capital improvement projects identified in the PROS Plan were prioritized according to high, medium and low priorities, in consideration of an analysis of the community’s needs, population and geographic distribution, project opportunities and potential funding. The PROS Plan also addresses various sources of park and recreation funding that are available to the City of Covington. Some of these sources are limited to particular types of projects or programs, while others are more general and may be applied to most any park project.

A number of strategies exist to improve service delivery for the Covington Parks and Recreation Department; however, clear decisions must be made in an environment of competing interests and limited resources. A strong community will is necessary to bring many of the projects listed in the PROS Plan to fruition. Given the current operating and capital budgets for the Department, general fund and grants alone will be unable to support both land acquisition and development for the highest priority projects, and a future bond, levy and/or special assessment backed by the support of local voters may be necessary.

6.7.1 Capital Facilities Planning

The Capital Facilities Element summarizes information, provided in more detail in the PROS Plan, regarding the proposed park and trail facilities for Covington’s 6-year capital improvement projects. Figure 6.3 illustrates the locations of the capital improvement plan projects identified in the PROS Plan.
Figure 6.3. Parks and Recreation Capital Improvements Plan Map

[ Map to be inserted -- Page left intentionally blank ]
Back of Figure 6.3.

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## COMPREHENSIVE PLAN AMENDMENT APPLICATION

**2011 Application Deadline: February 1, 2011**

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### APPLICANT

- **Name:** Richard Hart, Planning Manager
- **Address:** 16720 SE 271st St. Suite 100
- **City/State/Zip:** Covington, WA 98042
- **Phone:** (253) 638-1110
- **Fax:**
- **E-mail Address:** rhart@ci.covington.wa.us
- **Signature:**

### AGENT

- **Name:**
- **Address:**
- **City/State/Zip:**
- **Phone:**
- **Fax:**
- **E-mail Address:**
- **Signature:**

### PROPERTY OWNER

- **Name:** NA: Non-Site-Specific
- **Address:**
- **City/State/Zip:**
- **Phone:**
- **Fax:**
- **E-mail Address:**
- **Signature:**

### PROPERTY OWNER 2

- **Name:**
- **Address:**
- **City/State/Zip:**
- **Phone:**
- **Fax:**
- **E-mail Address:**
- **Signature:**

### TYPE OF COMPREHENSIVE PLAN AMENDMENT

- □ This is a site-specific amendment proposal. Complete site-specific information below.
- □X This is a non-site-specific amendment proposal. Complete area-wide/textual amendment information below.
- □ This amendment proposal involves changes to development regulation text and/or tables and/or changes to the zoning map. Complete a separate Application for Development Regulation and/or Zoning Map Amendment.

### SITE-SPECIFIC AMENDMENTS

- Give street address or, if vacant, indicate lot(s), block, and subdivision OR tax lot number, access street and nearest intersection. If proposal applies to several parcels, list the streets bounding the area.
- **ADDRESS(ES):**
- **ASSESSOR’S PARCEL NUMBER(S):**
- **SITE AREA:**
- **LEGAL DESCRIPTION(S):**

- □ PROPOSED CHANGE TO FUTURE LAND USE MAP DESIGNATION: FROM ________ (CURRENT) TO _______ (PROPOSED)
- □ PROPOSED CHANGE TO OFFICIAL ZONING MAP DESIGNATION: FROM ________ (CURRENT) TO ________ (PROPOSED)
**AREA-WIDE & TEXT AMENDMENTS**

Chapter and section of comprehensive plan to be amended: **Downtown Element Ch. 4-**Figure 4.5 and **Transportation Element Ch. 5-**Figure 5.7

Indicate either conceptual or specific amendatory language. Please be as specific as possible to aid in the evaluation of your proposal. If specific changes are proposed, please indicate current language and proposed language.

Figure 4.5, which is the Town Center Street Type Map in the Downtown Element, is proposed for amendment by replacing the missing middle segment of the proposed roadway, 171st Ave SE, between SE 276th St. and SE 274th Place. This segment completes the entire length of the proposed 171st Ave SE as the traditional pedestrian-oriented “Main Street” within the new Town Center Zone. Figure 5.7, which is the 20-Year Capital Improvement Plan Map for 2010-2029, is also proposed for amendment by replacing the missing middle segment of the proposed 171st Ave SE between SE 276th St. and SE 274th Place. This segment also completes the entire length of the proposed 171st Ave SE CIP project as the traditional pedestrian-oriented “Main Street” within the Town Center Zone.

**DESCRIPT HOW PROPOSAL MEETS DECISION CRITERIA**

An amendment may be considered for placement on the final docket under any one of the following circumstances. Check the applicable box, and describe in detail how the proposed amendment complies with the criterion. Attach additional sheets as necessary.

- [ ] 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.  
  **NA-as proposed amendment is not site-specific**

- [ ] State law requires, or a decision of a court or administrative agency has directed such a change.  
  **NA-as the proposed amendment is not site-specific**

- [ ] There exists an obvious technical error in the pertinent comprehensive plan provision.  
  **NA-as the proposal is not site specific**
If none of the three conditions on p.2 apply, then the proposed amendment must meet all five of the following criteria. Please answer the following questions, providing specific details and attaching additional sheets as necessary.

1. Explain how the proposed amendment is appropriately addressed through the comprehensive plan and how it would be a public benefit to the City of Covington (i.e. enhances the public health, safety, and welfare).

The Comprehensive Plan Downtown and Transportation Elements vision statement, goals, policies, and text provide for a pedestrian-oriented “Main Street” within the new Town Center. In the current Downtown & Transportation Elements the proposed 171st Ave SE, a Type II street, is the envisioned “Main Street”, and there is a small segment of the entire length that was omitted when this Downtown Element was adopted. The Downtown Plan completed in 2009 called for the entire length of this street to be the pedestrian focus of the new Town Center. In order to further the vision and goal of the 2009 Downtown Plan, to provide predictability for future developers, to enhance the pedestrian nature of a true “Main Street”, and to provide guidance for determining design standards for any future development projects, the entire length of the proposed 171st Ave SE, “Main Street”, should have a similar designation to provide consistency for design and development.

2. Proposed amendments that are the same or substantially-similar to an amendment proposed during the last three amendment cycles are not eligible for consideration, except in certain cases due to geographic expansion by the City (see CMC 14.25.040(3)). Has the same or a substantially-similar amendment been proposed during the last three annual amendment cycles?

   □ No □ Yes

   If yes, how has geographic expansion necessitated the proposed amendment?

   The Proposed amendment has not been considered before. This amendment is submitted at the request of the Planning Commission to align the Comp Plan maps with the vision of the Downtown Plan.

3. Does the proposed amendment raise any policy or land-use issues that are more appropriately addressed by an ongoing work program approved by the City Council?

   □ No □ Yes

   Please explain:
   Neither of the proposed amendments to the Map Figures 4.5 or 5.7 raise such issues.

4. Explain how 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.

   Since the last time these Figures 4.5 and 5.7 in the Downtown and Transportation Elements were added to the Comp Plan, proposed developments in the Town Center have also changed, and the desire is to provide for a continuous uninterrupted pedestrian-oriented “Main Street” as the focus of the Town Center in order to meet the long-term vision of the City as identified in the Comprehensive Plan Policies.
5. Explain how the proposed amendment is consistent with:

(a) The vision, goals, and policies of the comprehensive plan, and other goals and policies of the City:

The Downtown Plan completed in 2009 called for the entire length of this street to be the pedestrian focus of the new Town Center. In order to further the vision and goal of the 2009 Downtown Plan, to provide predictability for future developers, to enhance the pedestrian nature of a true “Main Street”, and to provide guidance for determining design standards for any future development projects, the entire length of the proposed “Main Street”, or 171st Ave SE, should have a similar designation to provide consistency for design and development.

(b) The Countywide Planning Policies, the Growth Management Act, State Environmental Policy Act (SEPA), the Washington Administrative Code, and other applicable state and federal laws.

The proposed changes outlined above are consistent with the Countywide Planning Policies, the Growth Management Act, SEPA & WAC, and other state & federal laws, as they follow directly the vision, goals, and policies in many related Elements of the Covington Comprehensive Plan, including the Land Use, Downtown, Transportation, and Public Facilities Element.

COSTS & BENEFITS / ADDITIONAL INFORMATION

1. Describe the effects of the proposed amendment in terms of costs and benefits to the public, both monetary and non-monetary.

The proposed changes to Figures 4.5, Town Center Street Type Map, in the Downtown Element and Figure 5.7, 20-year CIP Map, will assist the design of high quality, pedestrian-oriented streets, will aid in programming future capital investments, and will ensure such road improvements are constructed either by the public, the private sector, or through a public/private partnership.

2. Describe and/or attach any studies, research information, or further documentation that will support this proposal.

The September, 2009 Covington Downtown Plan and Zoning Study

CERTIFICATION / SIGNATURE

I have reviewed the Comprehensive Plan Amendment Instruction Guide and Timeline, and certify that the information provided on this application is true and correct.

________________________________________  ________________
Applicant’s/Agent’s Signature            Date

Please note: If this is a site-specific amendment proposal, all affected property owners must complete, sign, and have notarized a Property Owner Declaration.
### Figure 4.5

**Downtown Street Types**

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<th>Street Type</th>
<th>Description</th>
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<tr>
<td>I</td>
<td>Pedestrian-oriented street within 66 ft ROW, 30 ft of pavement, two driving lanes, on-street parking and minimum 10 ft clear walkway.</td>
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<tr>
<td>II</td>
<td>Pedestrian and vehicular-oriented street within 86 ft of ROW, 30 ft of pavement, two driving lanes, on-street parking, center landscaped median, accommodating bicycle lanes and minimum 8 ft clear walkway.</td>
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<tr>
<td>III</td>
<td>Landscaped boulevard within 100 ft of ROW, 35 ft of pavement, two driving lanes, center landscaped median, accommodating bicycle lanes and minimum 15 ft clear walkway and amenity zone.</td>
</tr>
<tr>
<td>IV</td>
<td>Major arterial roadway within 126 ft ROW, maximum 94 ft of pavement, four driving lanes, center median, transit access lane, no on-street parking, 6 ft landscaped buffer and minimum 8 ft clear walkway.</td>
</tr>
</tbody>
</table>
APPLICATION FOR DEVELOPMENT REGULATION
AND/OR ZONING MAP AMENDMENT 2011

<table>
<thead>
<tr>
<th>STAFF USE ONLY</th>
<th>Docket Number: DRA-2011-1</th>
<th>Application Date: 1-25-11</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>x □ City-initiated</td>
<td>□ Privately-initiated</td>
</tr>
</tbody>
</table>

### APPLICANT
- Name: Richard Hart, Planning Manager
- Address: 16720 SE 271st Street, Suite 100
- City/State/Zip: Covington, WA 98042
- Phone: (253) 638-1110 Ext. 2226
- Fax: __________
- E-mail Address: rhart@ci.covington.wa.us
- Signature: __________

### AGENT
- Name: (Same as Applicant)
- Address: __________
- City/State/Zip: __________
- Phone: __________
- Fax: __________
- E-mail Address: __________
- Signature: __________

### PROPERTY OWNER
A variety of property owners in the downtown zones of the City are affected by the change.

### PROPERTY OWNER 2

### TYPE OF AMENDMENT
- x □ This is a proposal to amend development regulation text or tables contained in the Covington Municipal Code.
- □ This is a proposal to amend the City’s zoning map.

### DEVELOPMENT REGULATION AMENDMENT

Chapter and section of Covington Municipal Code to be amended: CMC 18.31.060 Downtown Zoning Districts Street Type Map

1. Is the proposed amendment a minor correction (i.e. one that does not result in any substantive change to the content or meaning of a development regulation, such as a correction to punctuation or numbering or a typographical or technical error)?
   - x □ No
   - □ Yes
   - If yes, amendment proposal is exempt from the notice and hearing requirements of Chapter 14.27 CMC and the Director may make a recommendation directly to the City Council.

2. What are the reasons for requesting this change?

   The reason for the change is to fill in a missing segment of the proposed 171st AVE SE, in the design regulations, which is intended as a pedestrian-friendly “Main Street” according to the vision of the Downtown Plan & Zoning Study and the Downtown Element of the Comprehensive Plan.
3. Provide either conceptual or specific amendatory language. Please be as specific as possible to aid in the evaluation of your proposal.

There is no amendatory language to the text of the Downtown Development and Design Standards. The change involves amending the Street Type Map in CMC 18.31.060 in order to add a missing segment in the middle of the proposed 171st Ave SE, which is intended to become the new pedestrian-oriented “Main Street” in the Covington Town Center. (See attached map)

DEVELOPMENT REGULATION AMENDMENT (CONT’D.)

PROPOSED CHANGE TO ZONE DESIGNATION: FROM ________ (CURRENT) TO ________________ (PROPOSED)

SURROUNDING ZONE DESIGNATIONS: EAST: _______ WEST: _______ NORTH: _______ SOUTH: _______

COMPREHENSIVE PLAN FUTURE LAND USE MAP DESIGNATION: NA

CURRENT LAND USE: NA

If this is a site-specific zoning map amendment, complete the following property information. Give street address or, if vacant, indicate lot(s), block, and subdivision OR tax lot number, access street and nearest intersection. If proposal applies to several parcels, list the streets bounding the area.

ADDRESS(ES): __________________________

ASSESSOR’S PARCEL NUMBER(S): __________________________

SITE AREA: ______________ sq. ft. / acres (circle one)

LEGAL DESCRIPTION(S): __________________________

ZONING MAP AMENDMENT

DESCRIBE HOW PROPOSAL MEETS DECISION CRITERIA

1. Proposed amendments that are the same or substantially-similar to an amendment proposed during the last three years are not eligible for consideration, except in certain cases due to geographic expansion by the City (see CMC 14.27.030(3)). Has the same or a substantially-similar amendment been proposed during the last three years? □ Yes □ No

If yes, how has geographic expansion necessitated the proposed amendment?
2. Explain how the proposed amendment is consistent with the goals, objectives, and policies of the comprehensive plan.  
*The Comprehensive Plan Downtown and Transportation Elements vision statement, goals, policies, and text provide for a pedestrian-oriented “Main Street” within the new Town Center. In the current Downtown & Transportation element the proposed 171st Ave SE Type II street, which is the envisioned “Main Street”. There is a small segment of the entire length that was omitted when this Downtown Element was adopted. The Downtown Plan completed in 2009 called for the entire length of this street to be the pedestrian focus of the new Town Center. In order to further the vision and goal of the 2009 Downtown Plan, to provide predictability for future developers, to enhance the pedestrian nature of a true “Main Street”, and to provide guidance for determining design standards for any future development projects, the entire length of the proposed 171st Ave SE, “Main Street”, should have a similar designation to provide consistency for design and development.*

3. Explain how the proposed amendment is consistent with the scope and purpose of the City’s zoning ordinances and the description and purpose of the zone classification applied for. 
*The Town Center Zone has Street types identified in order to determine the level of design standards and criteria that will apply to future development. A continuous street would best apply these consistent design standards along the entire length.*

4. Explain how circumstances have changed substantially since the establishment of the current development regulation, zoning map or district to warrant the proposed amendment. 
*Several development proposals have been entertained for the new Covington Town Center. Thus, having a continuous pedestrian-oriented street along the proposed 171st Ave SE with the same design standards is beneficial to the new Covington Town Center. Establishing a full-length street and restoring the continuous Type II pedestrian street along the entire length is advantageous to the vision of the TC.*

5. Explain how the proposed zoning is consistent and compatible with the uses and zoning of surrounding property. 
*Consistency of design standards and street types on the Street Type Map along the proposed “Main Street” or 171st Ave SE will provide for a more unified, pedestrian-friendly design within the Town Center and contribute to the overall vision of Council in line with the Downtown Plan & Zoning Study.*

6. Explain how the property that is the subject of the amendment is suited for the uses allowed in the proposed zoning classification. 
*NA. This is not a change in proposed uses, but a change in street type that only affects the design of buildings on the street frontage.*

7. Explain how adequate public services could be made available to serve the full range of proposed uses in that zone. 
*The change in the Street Type Map to provide a continuous street along 171st Ave SE will not affect the type or scale of public services for the propose uses in the surrounding zones. All public services will still have to be provided to any use on this street regardless of the Street Type.*
## COSTS & BENEFITS / ADDITIONAL INFORMATION

1. Describe the effects of the proposed amendment in terms of costs and benefits to the public, both monetary and non-monetary.

   *There should be no monetary costs to the public or the local government. The benefits to the public will be a more pedestrian-friendly street frontage and public realm along the future “Main Street” in the Covington Town Center and a more consistent design of buildings including retail, office and residential uses.*

2. Describe and/or attach any studies, research information, or further documentation that will support this proposal.

   *The Downtown Plan and Zoning Study, completed in September, 2009, provides the vision, goals, and policies for a pedestrian-oriented Covington downtown and identifies 171st Ave SE as the primary “Main Street” in the new Town Center. This change furthers that vision and goal.*

## CERTIFICATION / SIGNATURE

I have reviewed the Development Regulation/Zoning Map Amendment Instruction Guide, and certify that the information provided on this application is true and correct.

__________________________  ____________________  
Applicant’s/Agent’s Signature  Date

*Please note: If this is a site-specific amendment proposal, all affected property owners must complete, sign, and have notarized a Property Owner Declaration.*
The information included on this map has been compiled by Covington staff from a variety of sources and is subject to change without notice.

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October 2009

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1:29,000

City of Covington

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City of Covington

20 Year Capital Improvement Plan 2010 - 2029

Figure 5.7

Priority | Project | From | To | Description
--- | --- | --- | --- | ---
A | 180th Ave SE Ext. | SE 267th Pl | SE 272nd St | Add 2 Through Lanes, Turn Lanes and Median
B | SE 272nd St | SE Wax Rd | 192nd Ave SE | Add 2 Through Lanes, Bike Lanes, Turn Lanes and Median
C | SE 256th St | 148th Ave SE | 160th Ave SE | Add 2 Through Lanes, Bike Lanes, Turn Lanes and Median
D | SE Wax Rd | Covington Way SE | SE 278th Pl | Re-align, Add Bike Lanes, Turn Lanes and Intersection Improvements
E | Covington Way SE | 168th Ave SE | SE Wax Rd | Add 2 Through Lanes, Bike Lanes, Turn Lanes and Median
F | 180th Ave SE | SE 261st St | SE Wax Rd (North) | Add Ped Overcrossing of SE 18, Turn Lanes, Median and Bike Lanes, 47 Thru Lanes n/w SE 256th St
G | SE 272nd St | 160th Ave SE | 164th Ave SE | Add 2 Right Turn Lanes and Bike Lanes
H | SE 256th St | 168th Ave SE | 180th Ave SE | Add 2 Through Lanes, Bike Lanes, Turn Lanes and Median

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Memo

To: Planning Commission Members
From: Richard Hart, Community Development Director
Salina Lyons, Senior Planner
Date: March 17, 2011

Public Hearing on 3 Proposed Comprehensive Plan Amendments and 1 Proposed Development Regulation Amendment as Part of the 2011 Annual Docket.

The Planning Commission has been presented with and discussed all four of these docketed amendment items at their last meeting in February. The Commission is now scheduled to hold their required public hearing on the Comprehensive Plan Amendments and Development Regulation Amendment items on March 17, 2011. At the March 17 meeting, the Planning Commission must consider formal, presented testimony; discuss content & options; and make a recommendation to the Council for adoption of the final Comprehensive Plan Amendments and Development Regulation Amendment Docket for 2011.

At the last meeting the Planning Commission asked for clarification of one item in CPA-2011-3 relating to whether the item should be considered a “site-specific” amendment or a “non-site-specific” amendment. According to the City Attorney the amendment should be classified as a “non-site specific” amendment. The determination is based on the fact that the amendment was not proposed by a specific property owner for the benefit of only that property, but rather was submitted by the Planning Commission with the intention of affecting and benefitting the entire downtown area and all downtown zoning districts.

Staff will answer any additional questions the Planning Commission might have on these 4 proposed docketed items at the public hearing meeting date on March 17, 2011, at which time the Planning Commission must also make a final decision and recommendation to the Council.

The Planning Commission will hold a study session with the City Council on April 12, 2011, to present their recommendations on the proposed 2011 docket. The Council will then make a final decision on the proposed 2011 docket at their April 26, 2011, meeting. The city staff and Planning Commission will then formally discuss the docketed amendments between April and August and the Commission will forward a final recommended action on the docketed amendments to the Council for their final action in the fall of 2011.
February 28, 2011

Richard Hart  
Acting Community Development Director  
City of Covington  
16720 SE 271st Street, Suite 100  
Covington, WA. 98042  

RE: CPA-2011-3, DRA-2011-1  

Dear Mr. Hart,  

The Covington Downtown Plan and Zoning Study completed in 2009 made recommendations that the “New Covington Town Center” have a full grid street  
circulation system with pedestrian connections.  

In 2010, the property owner of the 17 acre “Towne Center” property went before the City  
Council to request omitting the segment of the proposed 171st Ave. SE. between SE 274th Place and SE 276th Street that would dissect the property in half. This request was made  
due to the hardship the connection would impose on the owner to develop the property.  
The request was granted by the City Council.  

The Planning Commission is now asking to amend the Comp Plan maps to include the  
previously omitted portion of 171st Ave. due to the sale of the western 10 acres of the 17  
acre “Towne Center” property. The sale of the 10 acres does not reduce the hardship to  
the property owner.  

I request the Planning Commission strongly consider rescinding Comp Plan Amendment  
2011-3 due to the hardship it will impose on the property owner.  

Thank you for your consideration in this matter.  

Sincerely,  

[Signature]  

Don Ramsey  
Ashton Development Company, LLC for  
Covington Towne Center, LLC.
February 28, 2011

Richard Hart  
Acting Community Development Director  
City of Covington  
16720 SE 271st Street, Suite 100  
Covington, WA. 98042

Re: CPA-2011-3

Dear Mr. Hart,

In regards to the Downtown Plan and Zoning completed in 2009 the City recommended that the City have a new “Town Center” that has a full grid system and circulation system with pedestrian connections. I would like to address my concerns regarding the North/South Road.

We have worked within the City of Covington on many different properties and developments over the past 12 years. I feel we have gone above and beyond to deliver the highest building quality, diversity of Tenants and overall “feel” to our projects in the City of Covington. In 2010 I went before the City Council and requested the deletion of the North/South Road which was granted (segment of the 171st road behind Safeway) by the City Council.

The Planning Commission is now asking to amend the Comp Plan maps and to include the previously omitted portion of 171st Ave. due to the sale of the eastern 10 acres of my 17 acre property. The sale to the Valley Medical group does not in any way reduce the financial hardship that the Council recognized it put me in last year. In fact this proposal of the new road has just again negatively impacted the sale of the property where the buyer has now rescinded the offer to purchase the property to do a new development.

I request that the Planning Commission strongly considers rescinding the Comp Plan Amendment 2011-3 due to the hardship it will impose.

Thank you for your consideration,

Sincerely,

[Signature]

Doug Mergenthaler