



# DOWNTOWN FORM BASED CODE AND INFILL EXEMPTION

## Existing Conditions Report

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MAKERS







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# 1 EXECUTIVE SUMMARY

## Introduction

In 2010 Covington formally updated its vision for Downtown and adopted the current design and development standards. Since then, concerns have been raised over both the quantity and quality of new development. Covington's 507 gross acre Downtown area is currently comprised of four zoning districts: General Commercial, Mixed Commercial, Mixed Housing/Office, and Town Center. Covington's aspiration for Downtown is a vibrant human-scaled environment with walkable streets and trails, high-quality mixed-use, office, and commercial development, and attractive streetscapes.

Leveraging a grant received from the Washington State Department of Commerce, to support housing development, Covington is evaluating a new "form-based" code that will more effectively implement the community's vision, respond to changes in the regional economy, and provide a catalyst for high-quality mixed-use construction in the heart of Covington. The City is also preparing an Environmental Impact Statement (EIS) and adopting an infill exemption as allowed by the State Environmental Policy Act (SEPA) RCW 43.21c.229.

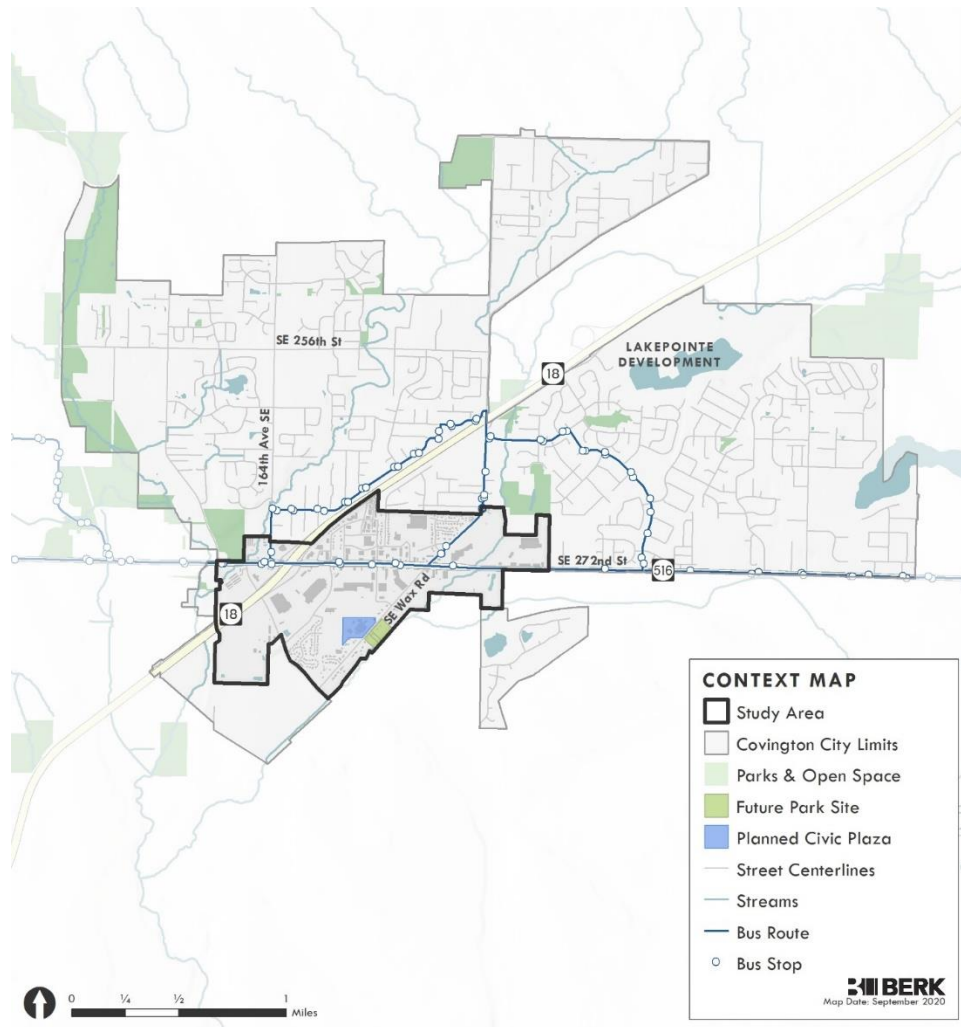
This Downtown Existing Conditions Report provides an evaluation of city codes and areas of potential focus for amendments. It provides a market assessment of economic conditions. It describes options for urban design and infrastructure needs and plans. The Existing Conditions Report will also serve as the "affected environment" of the EIS, addressing:

- Surface Water and Stormwater
- Land and Shoreline Use
- Aesthetics and Urban Design
- Socio-economics
- Transportation
- Utilities
- Public Services

# Study Area

As of 2020, Covington is a city of 20,530<sup>1</sup> people located in southeast King County. Covington’s 507 gross acre Downtown is where commercial activity is concentrated. The City seeks to establish a distinct identity and vision for the role of Downtown Covington. See Exhibit 1-1.

Exhibit 1-1. City of Covington and Study Area Map.



Source: BERK, 2020.

<sup>1</sup> State of Washington Office of Financial Management (OFM) April 1 official population estimates, updated June 29,2020. Available:

# Findings

For each topic, a summary of findings is included below.

## Surface Water and Stormwater

- Natural and constructed stormwater systems serve the Downtown area, and the City has stormwater regulations to protect water quality. The City stormwater manual requires feasible LID practices including infiltration, which is feasible in most areas of Covington including Downtown.
- The City of Covington appears to be current on stormwater systems as they relate to the City's planning documents for site improvements and transportation uses, design criteria for water quality and water quantity, and fees to cover maintenance and future improvements.

## Land and Shoreline Use

- The study area is primarily commercial in nature with large parcels adjacent to smaller single family homes on SE Wax Road and several subdivisions on the north and south side of Downtown, all of which are currently zoned MHO.
- The City has a vision for a compact mixed use center that is still early in its progress towards a mixed use walkable character.
- The area south of SE Wax Road is flanked by Jenkins Creek, a shoreline of the state with wetlands and a floodplain. The Shoreline Master Program allows medium intensity uses and prefers adaptive reuse of homes given buildings are often within shoreline buffers or setbacks; a shoreline buffer applies. Critical area regulations also protect wetlands and streams with buffers.
- When designing road and other circulation projects the City considers all applicable federal, state, and city policies and regulations, and improves environmental conditions where feasible. The City has implemented fish passage improvements and is designing road improvements in the Capital Facility Plan to address fish passage.
- The State Environmental Policy Act (SEPA) provides for categorical exemptions including an infill exemption in areas that are similar to or below density and intensity goals of the Comprehensive Plan. This would not include lands covered by water including wetlands.

## Aesthetics and Urban Design

- Covington's Downtown urban form began 40 years ago with an auto-oriented commercial form that still largely persists.
- Upon incorporation in 1997 through 2010 the City planned a more cohesive Downtown with a town center, gridded streets, and mixed use development.
- Over time, new development has made progress but has not realized the vision of the Downtown.
- A form-based code is underway to focus on form and relationship of buildings to the public realm – streets and gathering spaces among other items – to improve development quality.

## Socio-economics

- Covington's Downtown population has grown substantially in the last 10 years by 69%, but is just about 12% of the city's population.
- Covington's Downtown has a higher share of Hispanic population than the City as a whole, the City overall is a little more diverse racially than Downtown.
- Downtown has a population greater in age and lower in income than the rest of the city.
- The area is seen as having a very low opportunity to positive life outcomes, due to existing housing and neighborhood quality, which can be addressed by greater housing variety and design standards and connection to the local and regional economy.
- Based on a market study (Appendix A), Covington should explore opportunities to retool development regulations to give the market flexibility to respond to shifting trends provided the development creates a compact, pedestrian-friendly environment that is key to long-term economic success.

## Transportation

- There is a continuing need for multi-modal, and specifically multi-use, paths in and around the Downtown core (generally the Town Center zone area), including incorporating wayfinding and illumination standards within the Downtown boundaries for public trails, sidewalks etc. Multi-use paths are identified in City subarea and comprehensive plans and studies from 2009 to 2019. Outside of the City's formal documents, the public is demonstrating a need for bicycle transportation facilities with increased bike sales in the Seattle metro area due to Covid-19.
- There is a desire to create a 'park once and walk' environment within the Downtown area. The Comprehensive Plan and the Downtown Plan and Zoning Study both provide a strategic plan for implementing pedestrian friendly facilities in the Downtown core as new

developments occur south of 272<sup>nd</sup> Avenue. To better connect the Downtown core north and south of 272<sup>nd</sup>, a mid-block crossing west of 172<sup>nd</sup> Ave SE could be evaluated and constructed.

## Utilities

- Sewer improvements have been made in Downtown Covington, but many parcels remain on septic service in the short-term.
- The Covington Water District has developed sufficient plans regarding water supply, implementation, protection, and fees for operations and maintenance.
- City regulations address wellhead protection for Lake Meridian Water District and the City of Kent. Land uses with hazardous materials are limited in the Downtown area due to its high susceptibility for contamination of groundwater sources.

## Public Services

- Downtown Covington with its concentration of commercial uses is a focal point for police calls for service. The City's adopted LOS standard evaluates demand for police officers based solely on population; however, Covington Police Department call response data indicates that commercial development generates proportionately higher demand for police service than residential uses.
- Two fire stations are located to the west and north of Downtown. Services are provided by the Puget Sound Regional Fire Authority (PSRFA).
- Educational services are provided by the Kent School District. There are no schools in operation in the study area with the recent City purchase a portion of the former Covington Elementary School site. Schools serving the study area appear to be meeting class size goals. District capital plans include modernization and improvement of schools serving the study area.
- There are no city parks in the study area though some abut the Downtown. The City purchased the Covington Elementary School for civic purposes though it has not been designed and programed to date. Land has also been purchased between Wax Road and Jenkins Creek for the future SoCo Park. City plans call for developing trails and non-motorized connections in Downtown.

## 2 SURFACE WATER AND STORMWATER

### Existing Plans and Documents Reviewed

The following documents were reviewed as a basis for this section:

- Stormwater Management Manual for Western Washington, July 2019
- City of Covington, Comprehensive Stormwater Plan Update, Parametrix, 2010
- Covington Municipal Code 13.25 & 13.30 regarding surface water regulations
- City of Covington Comprehensive Plan 2015-2035, January 2016, updated through 2019
- City of Covington Parks, Recreation and Open Space Plan, 2016 Update
- Town Center Economic Impact and Infrastructure Cost Study, June 2014
- Downtown Design Guidelines and Standards, April 2014
- Covington Downtown Plan and Zoning Study, September 2009
- Transportation Assessment and SWOT Analysis Memo by Nelson Nygaard, April 2009

For a review of floodplain maps and regulations, please see Chapter 3, Land and Shoreline Use.

### Existing Features

The City is located within the Green River Watershed (Water Resource Inventory Area 9). Streams generally drain to the south or southwest into Big Soos Creek, which drains into the Green River approximately 4.5 miles southeast of the City, just east of the City of Auburn.

Jenkins Creek, and associated wetlands and floodplains, lies along the southern edge of Downtown south of SE Wax Road and east of 180<sup>th</sup> Ave SE. Little Soos Creek meets Big Soos Creek north of SR 18 on the far northwestern edge of Downtown. The confluence of Jenkins Creek and Big Soos Creek occurs just south of the city limits. See Exhibit 2-1.

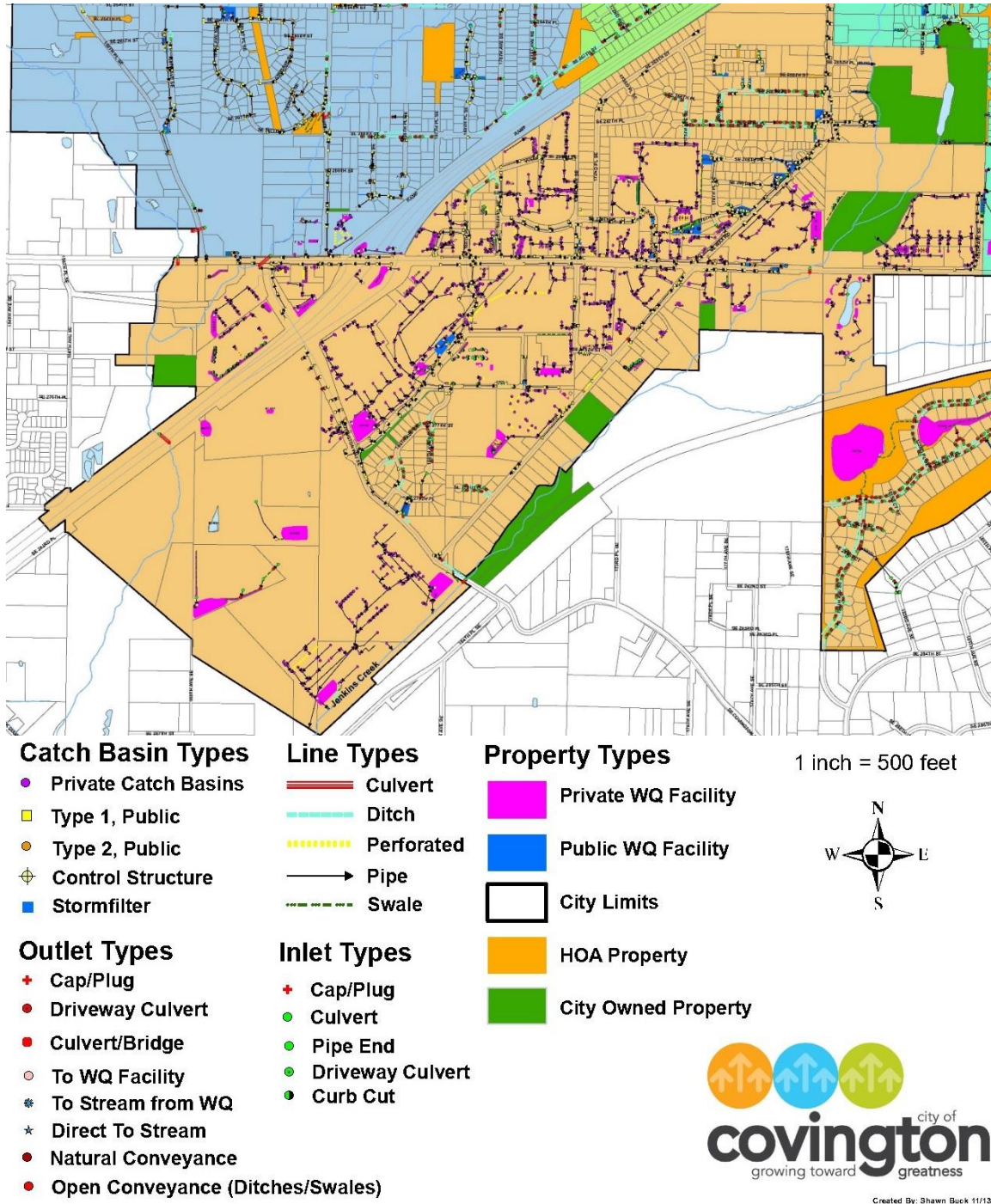


The City's existing stormwater conveyance system consists of several components such as curb inlets, catch basins, piping, open ditches, detention ponds, infiltration facilities, and water quality ponds.

Exhibit 2-2 is a map of constructed facilities in the City with a focus in the Downtown vicinity. There are mostly private stormwater quality facilities and private catch basins, and pipes, in some of the residential areas there are ditches.



Exhibit 2-2. City of Covington Stormwater Features



Source: (City of Covington, 2018)

## Current Guidelines / Standards

Allowing for changes in land cover without providing adequate on-site mitigation results in higher demand for the City to implement stormwater capital improvement projects to address problems adjacent to or downstream of developments or other projects with land cover changes. In accordance with the NPDES Western Washington Phase II Municipal Stormwater Permit, the City requires development to provide on-site stormwater management to mitigate these impacts. The City has also adopted the Department of Ecology's Stormwater Manual for Western Washington, allowing the most recent manual and amendments to apply. The City has also adopted the Puget Sound Partnership Low Impact Development Technical Guidance Manual for Puget Sound (CMC 13.25.020) More information about the adopted regulations is provided below. Each are further described below.

Storm water treatment and protection measures are outlined in the city's latest Comprehensive Plan 2015-2035, Covington Downtown Design Guidelines and Standards (2014), and three other infrastructure study reports for the city. Each of the documents appear to be consistent in the application of stormwater solutions as the city grows in the future.

The city adopted the Washington State Department of Ecology, Stormwater Management Manual for Western Washington (SMMWW) as the guide for calculating stormwater quality and quantity treatment solutions. The state updated the manual in July 2019. The update includes significant changes such as continuous simulation modeling, impervious surface thresholds, and Best Management Practices (BMP) revisions and additions. Continuous Simulation Modeling is the most significant update to the manual as it requires any new facilities to be designed using data from real-world rainfall events, the hydrologic cycle, drainage size, and land use. Models with accurate input data have the ability to calculate stormwater runoff before, in-between, and after rainfall events that help designers and engineers apply appropriate mitigation facilities and BMP for a specific site. In most cases, the advancement in modeling demonstrates reduced peak flows and the sizing of storm water ponds; however, the analysis of Low Impact Development (LID) system interaction with the groundwater can be challenging.

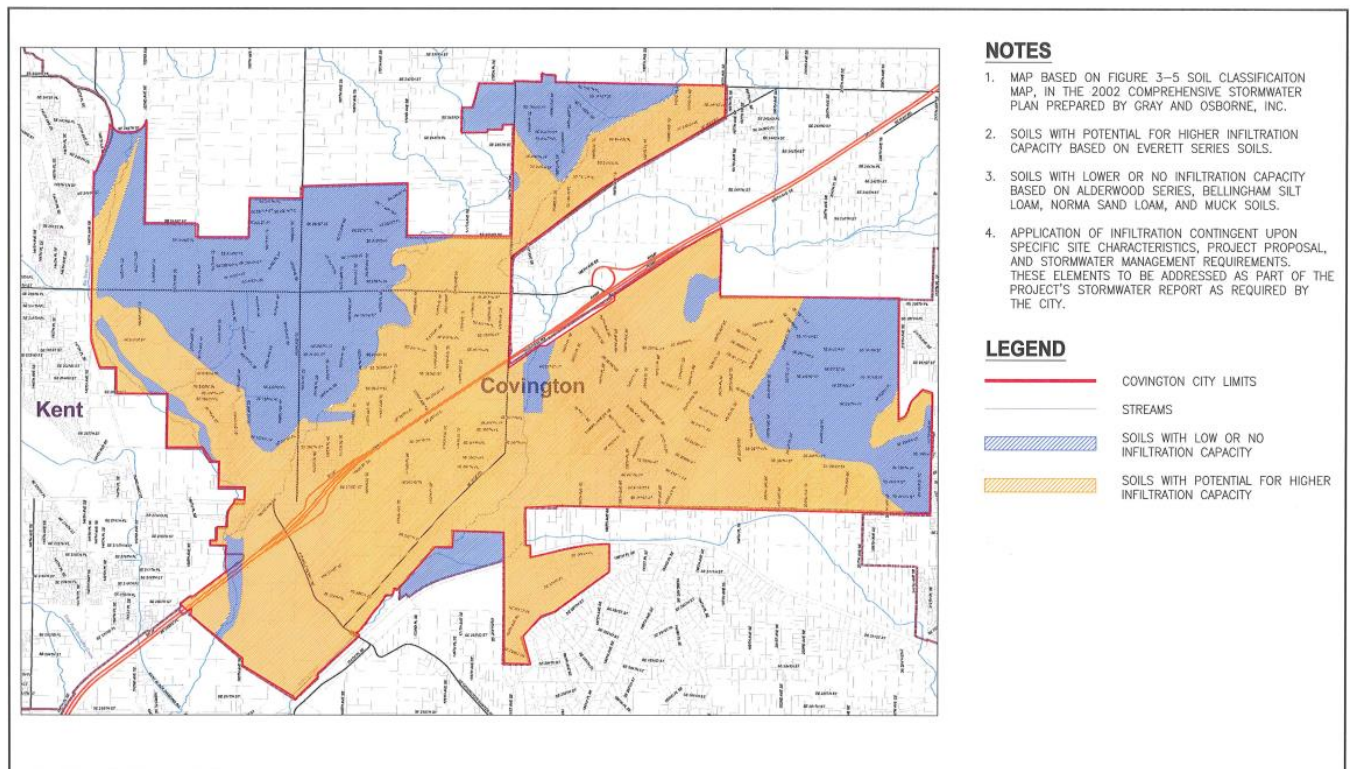
The existing infrastructure studies and city guideline documents reference the need to implement LID approaches as long term economic and environmental solutions for urban and suburban stormwater runoff. Many of the stormwater LID design techniques identified by the city plans, manuals, and codes are consistent with the design guidelines outlined in the updated SMMWW.

In addition to regulating public and private development in its plans, manuals, and codes, the City implements its surface water management program and stormwater utility rate in CMC 13.30.

The Town Center Economic Impact and Infrastructure Cost Study, June 2014, provides a detailed breakdown of eleven town center road improvement projects. Each of the road segment projects are classified into three different road types (I, II, or III) and each type requires a low impact development approach for stormwater management.

LID techniques often promote stormwater infiltration. City lands including Downtown have a great potential for stormwater infiltration as shown in Exhibit 2-3.

### Exhibit 2-3. Covington Soils and Infiltration Capacity



Source: Figure 2-1 from 2010 Comprehensive Stormwater Plan Update; (City of Covington, 2010)

The city website provides an updated 2020 fee schedule for all land use, development, or impact fees, including stormwater.

## Key Findings and Planning Implications

Natural and constructed stormwater systems serve the Downtown area, and the City has stormwater regulations to protect water quality. The City stormwater manual requires feasible LID practices including infiltration, which is feasible in most areas of Covington including Downtown. The City of Covington appears to be current on stormwater systems as they relate to the City's planning documents for site improvements and transportation uses, design criteria for water quality and water quantity, and fees to cover maintenance and future improvements.

# 3 LAND AND SHORELINE USE

## Existing Features

### Current Land Use

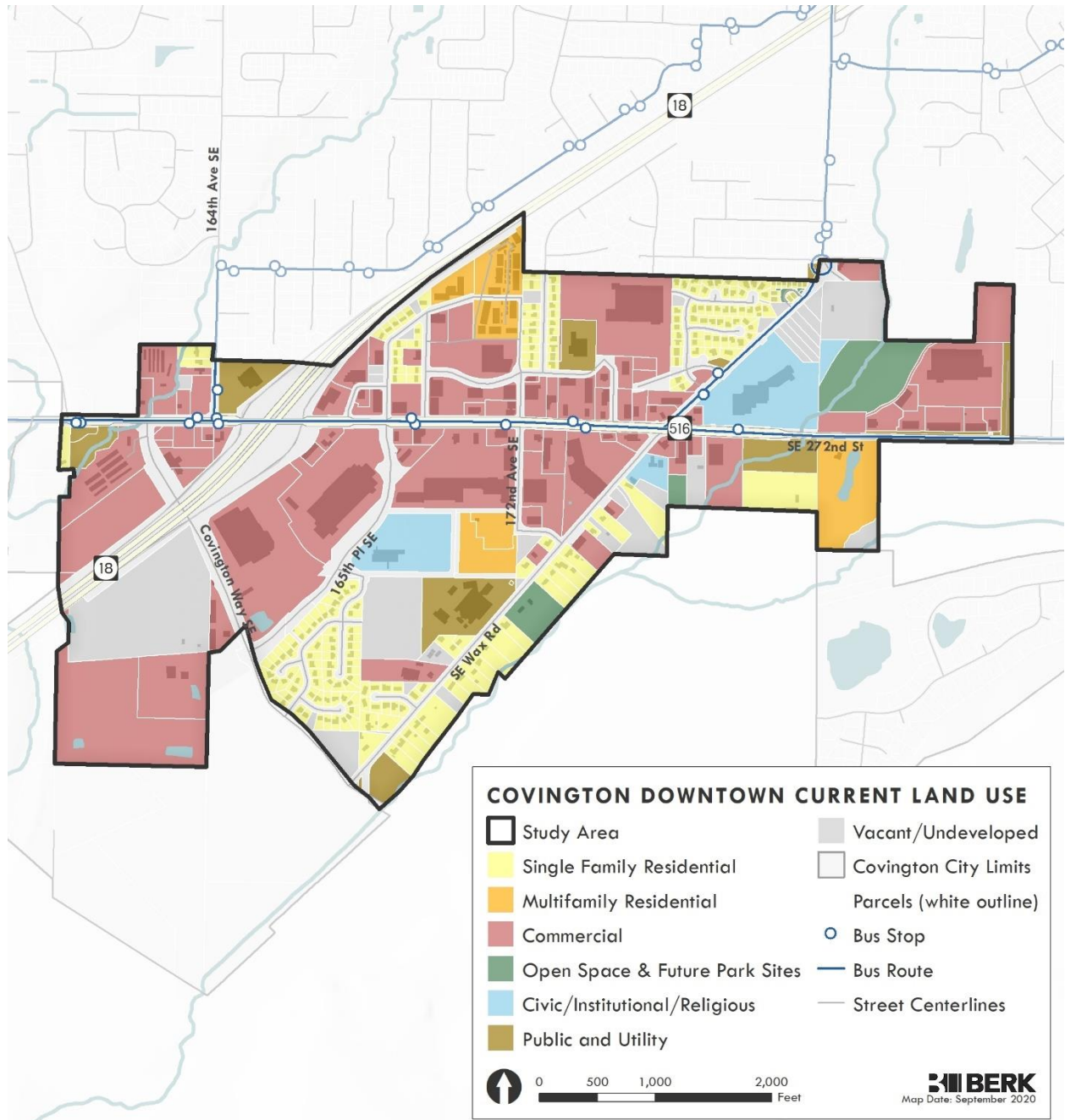
Downtown Covington is primarily commercial at 49% of parcel acres. The second most prevalent use is single family at 15%, followed third by vacant/undeveloped land at 13%. See Exhibit 3-1. Commercial areas are located between SR 18 and SR 516. Single-family homes are largely located along and near SE Wax Road. See Exhibit 3-2.

**Exhibit 3-1. Downtown Covington Current Land Uses**

Current Land Use	Gross Parcel Acres	Acreage (% Total)
Civic/Institutional/Religious	24.5	6%
Commercial	204.5	49%
Multifamily Residential	25.5	6%
Private Open Space	0.3	0.1%
Public and Utility	26.8	6%
Open Space and Future Park Sites	14.1	3%
ROW	5.0	1%
Single Family Residential	63.7	15%
Vacant/Undeveloped	55.1	13%
<b>Total</b>	<b>419.7</b>	<b>100%</b>

Source: King County Assessor, BERK 2020.

Exhibit 3-2. Map of Current Land Uses in Downtown Covington



Source: King County Assessor, BERK 2020.

## Comprehensive Plan and Zoning

The Future Land Use Map in Covington’s 2015-2035 Comprehensive Plan designated Downtown Covington as “Downtown.” The now closed Covington Elementary School was in operation and classified as “Public Parks, Recreational Facilities & Schools.” See Exhibit 3-5.

Within the Downtown area are four zones that implement the Future Land Use Map Downtown designation including Mixed Commercial at 50%, General Commercial at 18%, and Town Center at 18%. See Exhibit 3-3 and Exhibit 3-6. Town Center zoning is located between 165<sup>th</sup> Place SE and SE Wax Road in the center of Downtown. Mixed Housing/Office (MHO) lies along the boundaries of Downtown in three distinct areas: a corridor bounded by Wax Road and Jenkins Creek; the Covington Firs single family subdivision platted in 1976, and a cluster of single family subdivisions along the northern boundary including the Covington Township (Div. I, Div. II, Phases 1 & 2) platted in 1991 and 1994 and Covington Pointe platted in 2007. The General Commercial zone is focused west of Covington Way SE. Mixed Commercial is located in the balance of the Downtown.

### Exhibit 3-3. Covington Zoning Acres

Zoning	Parcel Acres	% Total
General Commercial (GC)	75.4	18%
Mixed Commercial (MC)	207.1	50%
Mixed Housing/Office (MHO)	57.0	14%
Town Center (TC)	75.0	18%
<b>Total</b>	<b>414.4</b>	<b>100%</b>

Source: King County Assessor, BERK 2020.

There are fewer large commercial parcels and more smaller residential parcels. See Exhibit 3-4.

### Exhibit 3-4. Average Parcel Sizes by Zone

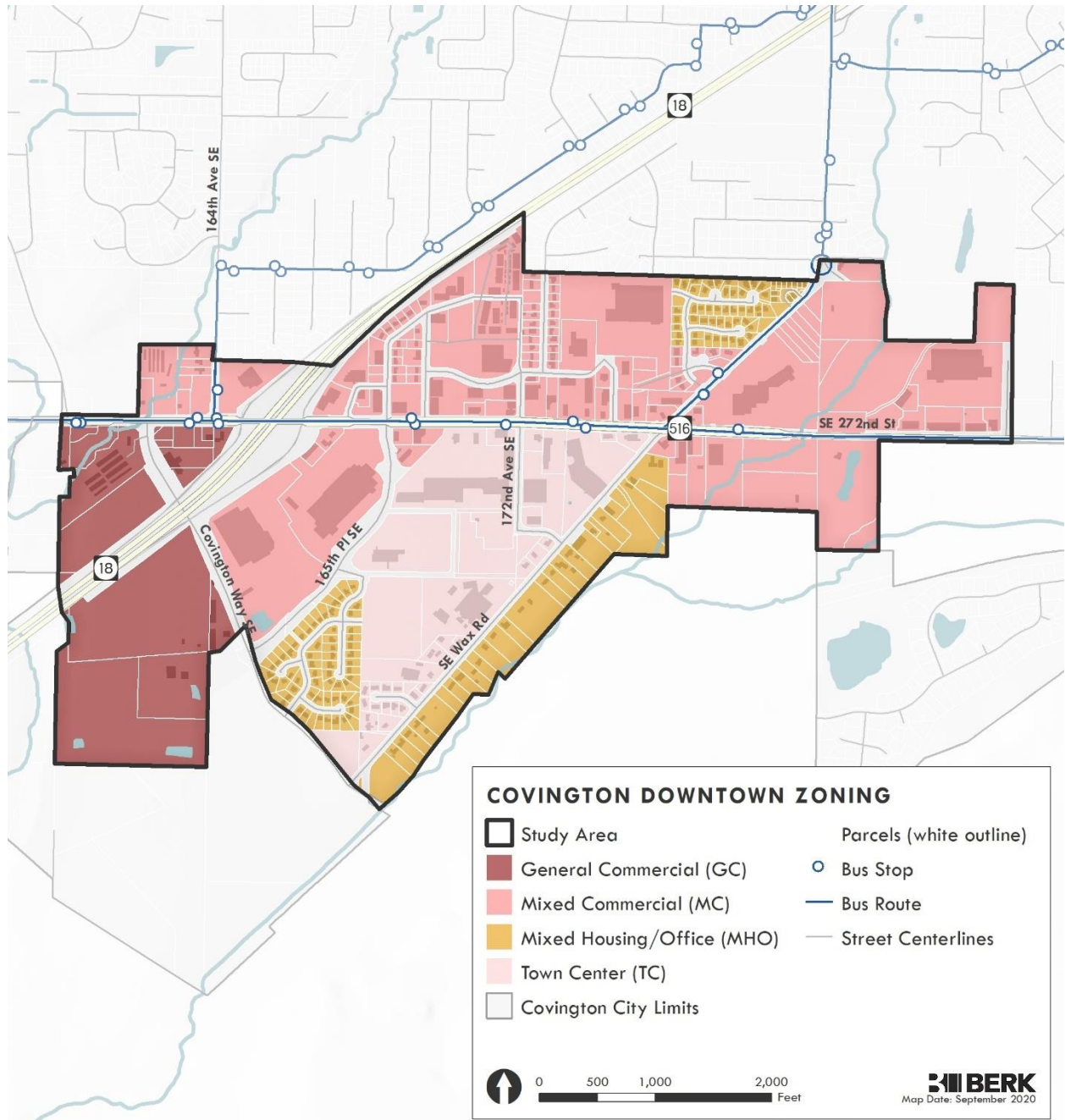
Zones	# Parcels	Average of Parcel Acres
General Commercial (GC)	17	4.4
Town Center (TC)	43	1.7
Mixed Commercial (MC)	130	1.6
Mixed Housing/Office (MHO)	155	0.4
<b>Total</b>	<b>345</b>	<b>1.20</b>

Source: King County Assessor, BERK 2020.





Exhibit 3-6. Downtown Covington Zoning Map



Source: King County Assessor, BERK 2020.

## Critical Areas

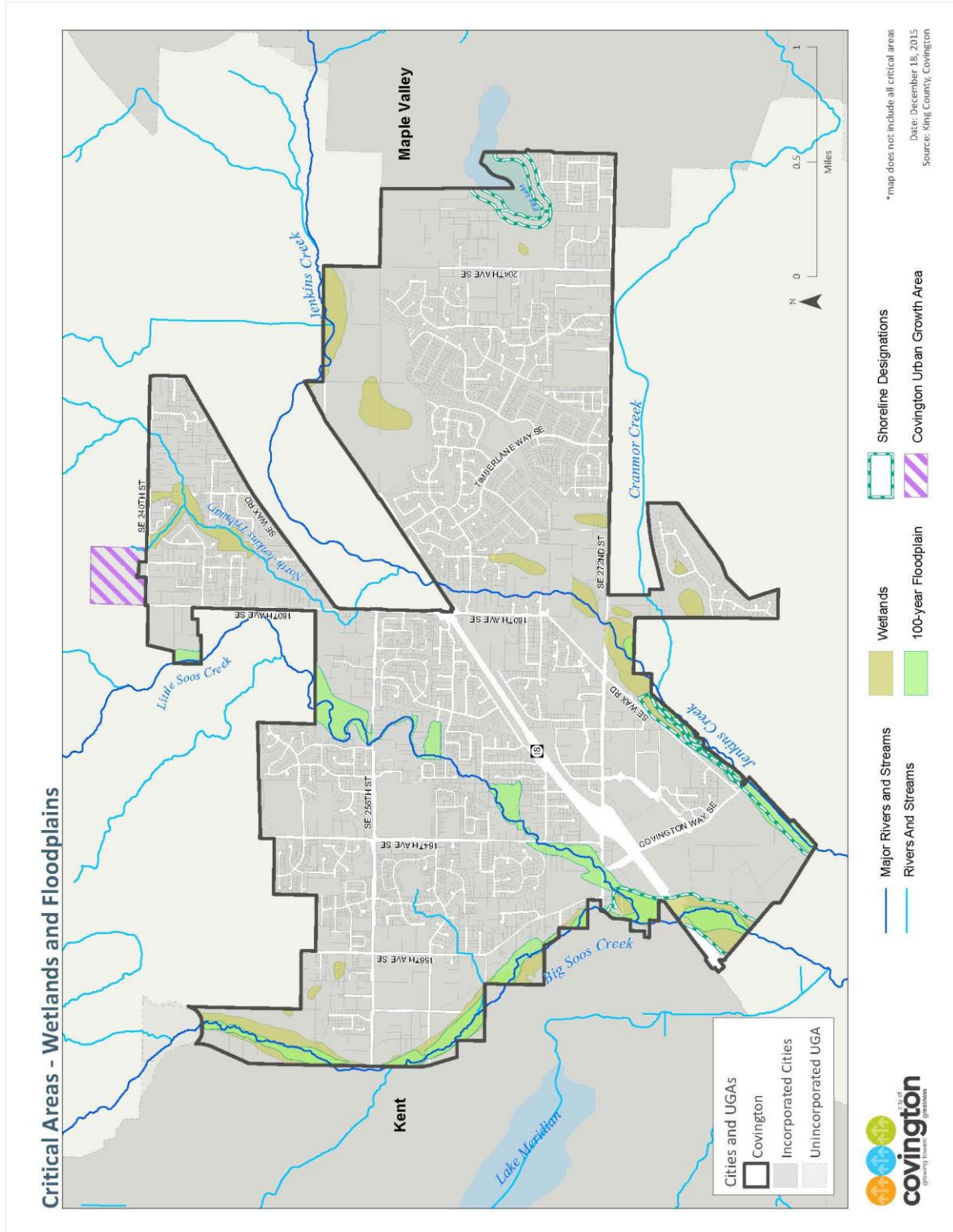
### Types and Location of Critical Areas

Critical areas are regulated under the Growth Management Act and Covington development regulations (CMC 18.65, as well as CMC 16.05 and CMC.16.15). Critical areas may include:

- Frequently flooded areas;
- Geologically hazardous areas;
- Critical aquifer recharge areas;
- Wetlands; and
- Fish and wildlife habitat conservation areas including streams & shorelines of the state.

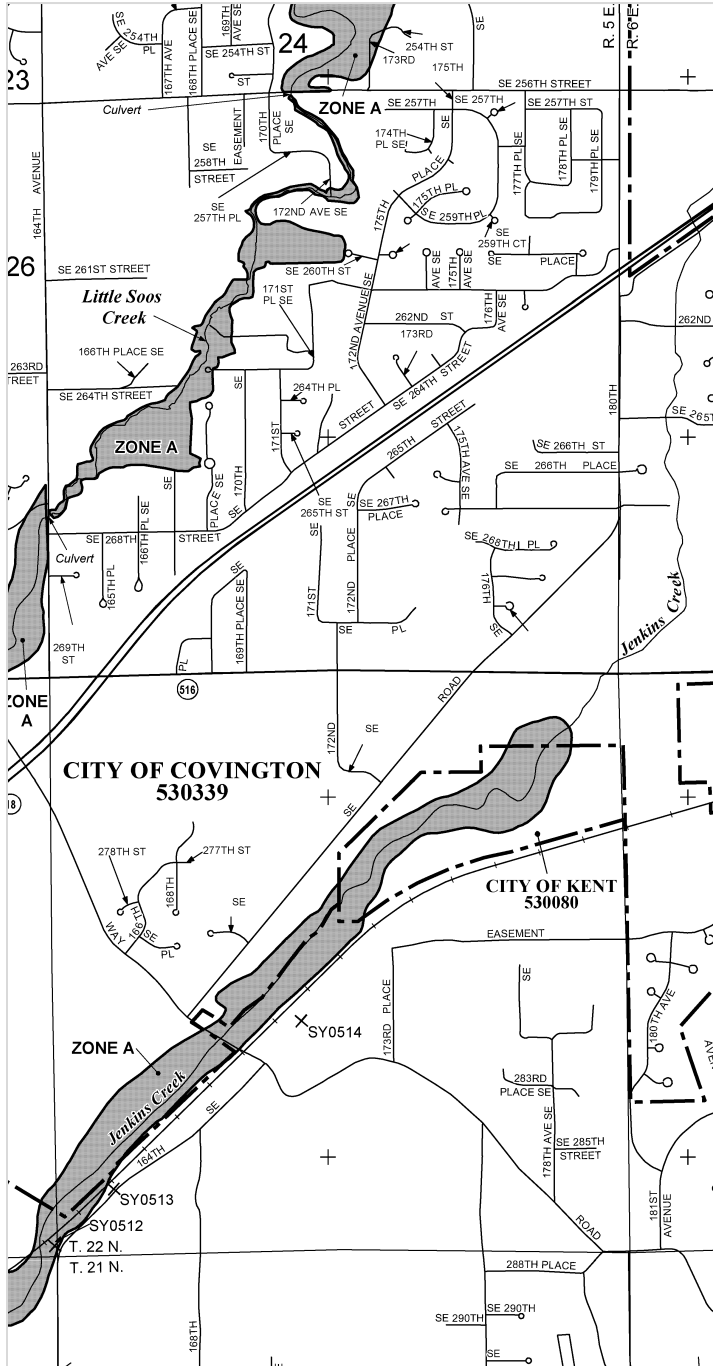
The study area is generally not subject to geologically hazardous areas; it has a low susceptibility to liquefaction. The principal critical areas in Covington's Downtown study area include streams (Jenkins Creek is classified as a shore of the state), wetlands, and frequently flooded areas, as well as critical aquifer recharge areas. See Exhibit 3-7 regarding wetlands and streams, and Exhibit 3-8 regarding floodplains. Aquifer recharge areas are addressed under Chapter 7, Utilities.

Exhibit 3-7. Wetlands and Streams



Source: King County 2015

### Exhibit 3-8. 100- Year Floodplains in Covington



Source: FEMA 2020

Streams, wetlands, and frequently flooded areas are estimated to make up about 21% of mapped critical acres. See Exhibit 3-9.

**Exhibit 3-9. Critical Areas Acres: Streams, Wetlands, and Frequently Flooded areas**

Zoning	Gross Acres	Critical Areas Acres: Wetlands, Floodplains, Streams
General Commercial (GC)	75.4	17.2
Mixed Commercial (MC)	207.1	38.3
Mixed Housing/Office (MHO)	57.0	31.0
Town Center (TC)	75.0	1.9
<b>Total</b>	<b>414.40</b>	<b>88.4</b>

Source: King County GIS; BERK 2020.

As noted in Chapter 7, in the Utilities section under Water, the entire Covington Downtown area is in a Category I critical aquifer recharge area that is highly susceptible to ground water contamination and that is located within a wellhead protection area for two water service providers.

### Critical Area Regulations

Covington’s Municipal Code (CMC) in Chapter 18.65 defines and regulates critical areas to protect their functions and values.

- Wetland buffers depend on the category and quality of the wetland and may range up to 225 feet in width.
- Excluding shorelines of the state, stream buffers for fish bearing streams are 115 feet and for perennial streams are 60 feet.
- Uses that could affect groundwater quality are restricted such as those with hazardous materials or underground or above-ground tanks; see further discussion in Chapter 7.

Floodplains are regulated by CMC Chapter 16.15, Flood Damage Prevention. Uses are limited in the floodway, but uses may be allowed in the floodplain subject to construction standards. Within flood hazard areas, maintenance and replacement of improvements are allowed as well as habitat enhancement. The City’s regulations also require that development proposals and alterations must not reduce the effective base flood storage volume of the floodplain.

## Shoreline Master Program

### SMP Use Environments and Buffers

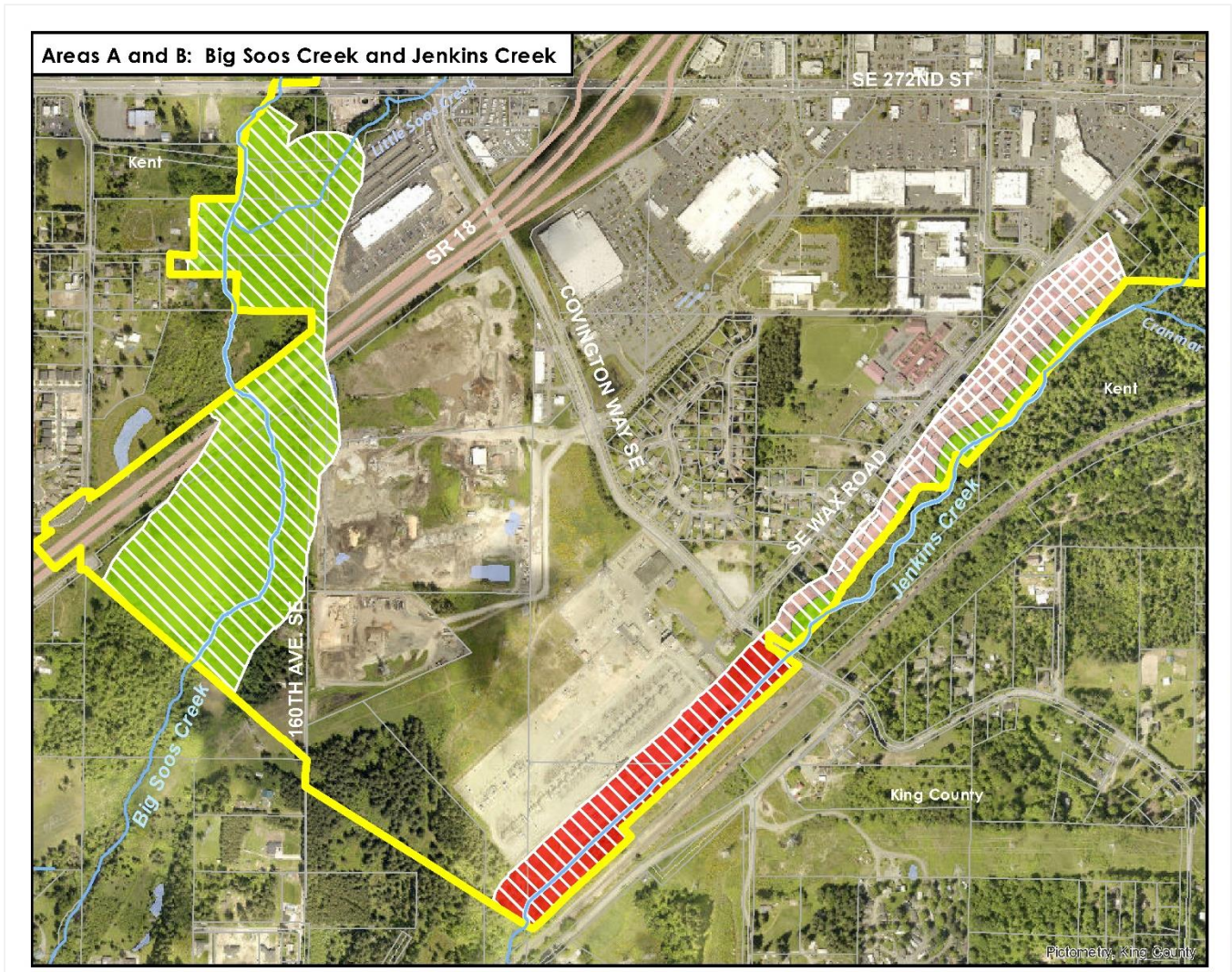
Segments of Big Soos Creek, and Jenkins Creek in Downtown, are classified as Type “S” in the city’s critical area regulations (CMC 18.65) and deemed shorelines of the state in Covington and regulated by the Shoreline Master Program (SMP) (CMC 16.05).

In Downtown, the Jenkins Creek shoreline lies south of SE Wax Road. Within 200 feet of the centerline of Jenkins Creek, a shoreline management area is designated, where policies and regulations designed to advance environmental protection, public access, and shoreline uses apply. Floodplains and wetlands are also associated with Jenkins Creek.

SMP shoreline designations applicable to the Jenkins Creek in Downtown include: Medium Intensity, Medium Intensity Subject to Wetlands Study, and Urban Conservancy. See Exhibit 3-10. Big Soos Creek’s shoreline designation in Downtown is entirely Urban Conservancy. Shoreline designations function like overlays on top of zoning. All of the Jenkins Creek shoreline jurisdiction is within the MHO zoning district, currently developed with single family residences, in the last decade several parcels have been redeveloped with low rise commercial uses.

In the Medium Intensity area, with or without a wetland study, uses promoted include: water-oriented and non-water oriented commercial, mixed-use, and residential-uses. Adaptive reuse of existing structures for office uses is emphasized in the SMP given structures are nonconforming with regarding to shoreline buffers or setbacks; public access and water-enjoyment uses are also allowed. Development should also be designed to protect existing ecological functions and restore ecological functions in areas that have been previously degraded.

Exhibit 3-10. Shorelines of the State in Covington Downtown Vicinity



### Shoreline Management Environmental Designations

<b>Environmental Designations</b>	Shoreline Management Area	Roads
High Intensity	Shoreline Approximate OHWM <sup>2</sup>	State Route 18
Medium Intensity	Streams <sup>3</sup>	Tax Parcels
Medium Intensity Subject to Wetland Study <sup>1</sup>	Water Bodies	Covington City Limits
Shoreline Residential		
Urban Conservancy		

1. This area is shown within the SMA because it is as a wetland. If site specific studies by a qualified biologist determine that wetland designation criteria is not met in a given location, by definition, these areas would be excluded from SMA jurisdiction.

2. OHWM = Ordinary High Water Mark

3. Location of streams are approximate and subject to field verification at time of application.

**Exhibit S-2**

Source: (City of Covington, 2019)

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## SHORELINE DESIGNATIONS

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- **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.
- **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. A subset of this designation is subject to a wetland study and is marked on the map as: Medium Intensity Subject to Wetland Study.
- **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.
- **Urban Conservancy:** The purpose of the Urban Conservancy Environment Designation is to protect and restore ecological functions of open space, floodplain, and other sensitive lands where they exist in urban and developed settings while allowing a variety of compatible uses.
- **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.

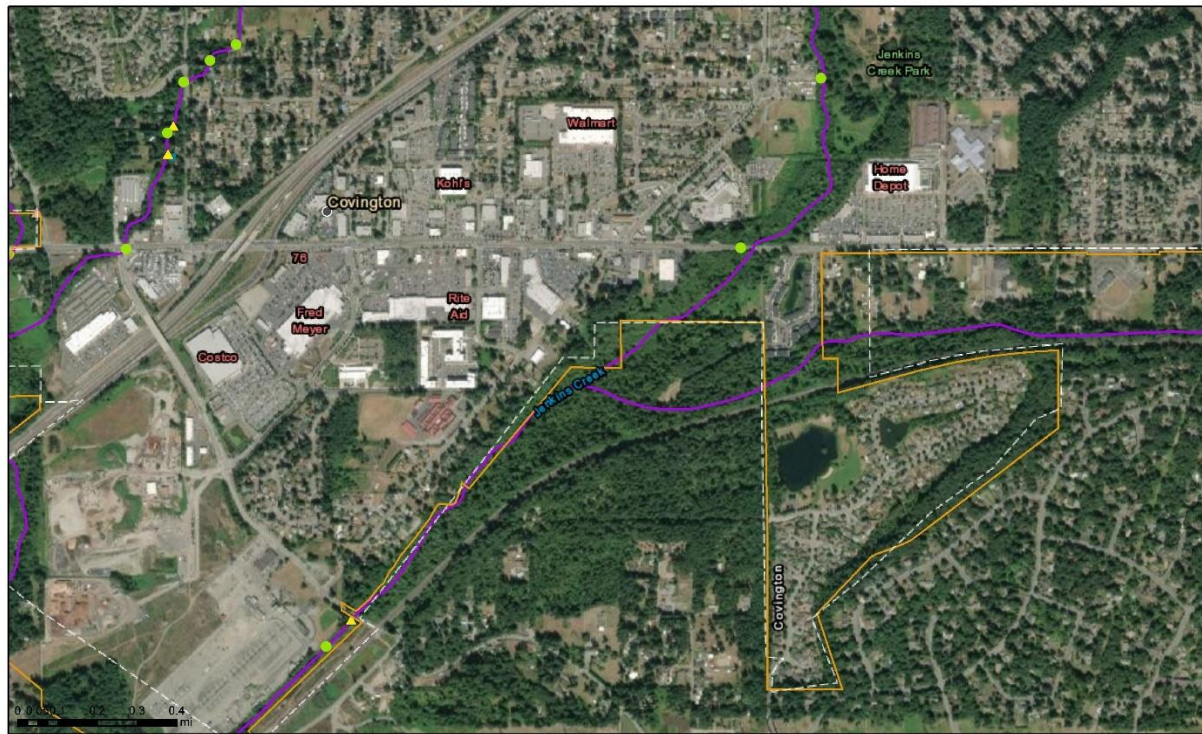
Heights are limited to 45 feet in the Medium Intensity designation, and to 30 feet in the Urban Conservancy designation. Shoreline buffers are 115 feet from the ordinary high water mark of the stream is required plus 15 feet for a building setback. Nonconforming structures may have a 250 foot lateral expansion where mitigated, and the expansion cannot increase the level of nonconformity.

### Fish Passage Barriers on Jenkins Creek

There are public and private fish passage barriers in Downtown Covington. See information developed by the State of Washington Department of Fish and Wildlife. See Exhibit 3-11.



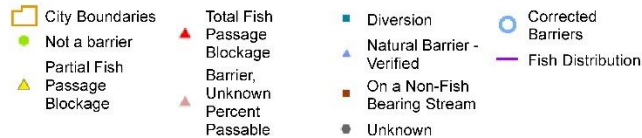
Exhibit 3-11. Washington State Fish Passage Database – Covington Downtown Vicinity



## Washington State Fish Passage



<http://apps.wdfw.wa.gov/fishpassage/>?context=122.1295,47.3461,122.0869,47.3649



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Source: (WDFW, 2020)

When designing road and other circulation projects the City considers all applicable federal, state, and city policies and regulations, and improves environmental conditions where feasible.

On SR 516 the city will be addressing fish passage barriers as part of two different CIP projects:

- The culvert on the eastside of the Downtown is a mapped fish barrier and will be fixed with the widening project for SR 516 (CIP 1127).
- The City will be designing the road project (CIP 1063) to improve the existing conditions and address the culvert on the west side that is considered a fish passage barrier though unmapped.

In 2015, the pedestrian bridge over Jenkins Creek and a second pedestrian bridge near the outlet of Spring Pond were replaced. The bridge replacement was accompanied by upgrades to the park's primary through-trail that connects the bridges. Permanent and temporary wetland

and stream buffer impacts related to these upgrades were mitigated by removal of old paths through the buffer, placement of large woody debris habitat features, and enhancement with native plants. (City of Covington, 2018)

## Land Use Plans and Regulations

### Comprehensive Plan

The Vision for Downtown is to create a walkable gathering place with mixed uses. Sub-districts vary in their mix of uses with some emphasizing commercial uses. See Exhibit 3-12.

#### Exhibit 3-12. Comprehensive Plan Downtown Vision and Designation

Component	Detail
Vision statement	To create a dynamic Town Center that includes retail, office, residential, and communal gathering spaces, and provides for development-friendly zoning and transportation requirements as well as improved surrounding areas.
Downtown Future Land Use Designation	<p>The Downtown category is intended to provide the majority of the retail commercial and office opportunities within the city, as well as various civic, social, residential, and recreational uses. The Downtown designation is intended to accommodate economic growth in a compact form with a mix of uses that lessens automobile trip lengths and promotes travel modes other than single-occupancy vehicles. Residential uses integrated with commercial uses in mixed-use buildings are encouraged.</p> <ul style="list-style-type: none"> <li>▪ Places for community events</li> <li>▪ Vibrant, active streetscapes with sidewalk vendors and street trees</li> <li>▪ Higher-intensity development (over time) with reuse of parking lots for new buildings</li> <li>▪ High-quality development</li> <li>▪ A scale and form that's walkable and comfortable for pedestrians</li> <li>▪ Connections to nearby parks and natural spaces</li> <li>▪ Distinctive landmarks to ensure people can easily find their way</li> </ul>
Downtown districts	<p><b>Town Center.</b> Encompassing 81 acres is an area envisioned as the heart and core of downtown, characterized by an intensive mix of uses, a vibrant and active streetscape, the most pedestrian-scaled land use and circulation system downtown, and includes an important public gathering space.</p> <p><b>Mixed Commercial.</b> These “gateways” to downtown Covington on the west and east encompass 231 acres. They accommodate a diverse mix of uses, emphasizing</p>

Component	Detail
	<p>retail and employment, with increased walkability and access for all modes of travel. Large format retail, auto-oriented uses and public uses may be part of the mix, provided they're compatible with the area's pedestrian-oriented scale and character.</p>
	<p><b>Mixed Housing &amp; Office.</b> Totaling 67 acres, this category includes infill housing and office development designed to be compatible with surrounding residential uses. Cottage housing types or single family detached housing may also be part of this category.</p>
	<p><b>General Commercial.</b> This 95-acre area is envisioned to include the broadest range of uses of any in the downtown, including commercial, light manufacturing, office, transportation and utility uses, as well as residential uses buffered from more intensive uses to ensure compatibility.</p>

Source: (City of Covington, 2019) 2015-2035 Comprehensive Plan

Goals and policies across multiple Comprehensive Plan elements focus on the Downtown. It is considered the “heart” of the community. Policies call for retaining major retail while allowing redevelopment with multi-story mixed uses. Design-oriented policies promote buildings close to the street, landscaping, and gateways. Breaking down blocks, creating interconnections between neighborhoods and uses, and adding multimodal facilities are also concepts in policies. Other general citywide goals and policies apply too; for a summary of key concepts applicable citywide, Comprehensive Plan Framework Goals are included. See Exhibit 3-13.

### Exhibit 3-13. Downtown-Specific Goals and Policies

Goal/Policy Number	Goal/Policy Text
FW Goal-I	FW Goal-I. Economic Development: Encourage and support a business community that is committed to Covington for the long-term and offers diverse products and services, family wage jobs, and a healthy tax base to support public services.
FW Goal-II	Town Center: Establish Covington Town Center as a vibrant residential, commercial, educational, social, and cultural gathering place that is safe, pedestrian-friendly, well-designed, and well-maintained.
FW Goal-III	Youth and Families: Provide City services, programs and facilities such as parks and recreation, and human services that emphasize and meet the needs of Covington’s youth and families.
FW Goal-IV	Neighborhoods: Foster community cohesiveness, communications, and cooperation, and maintain neighborhoods that offer a variety of housing options that are diverse, safe, accessible, and well-designed.

Goal/Policy Number	Goal/Policy Text
FW Goal-V	Municipal Services: Plan, develop, implement, and maintain high-quality capital infrastructure and services that reflect the needs of a growing community.
FW Goal-VI	Customer Service: Recruit, support, and retain a professional team of employees, volunteers, and stakeholders who offer outstanding customer service, ensure stewardship of the public's money, and promote the City.
FW Goal-VII	Covington's People are Valued: Respect the dignity of all people as they seek to live, work, play, shop, and learn in Covington.
FW Goal-VIII	Community Sustainability: Advance social, educational, economic, and environmental goals in parallel to foster comprehensive community sustainability.
FW Goal-IX	Nature in our Neighborhoods: Honor the connection between community and environmental health by integrating nature in our neighborhoods.
Goal LU-IV.	Covington's downtown is the economic and entertainment heart of the community, flourishing from the investment in infrastructure, mixed-use development, and high quality urban design.
Policy LU-27	Encourage a variety of development in the downtown with an emphasis on multi-story mixed-use, while allowing existing, major retail components to remain until market conditions support redevelopment; allow limited, regulated, and high-quality designed large format retail while minimizing impacts on adjacent residential neighborhoods.
Policy LU-28	Encourage the integration of new office, service, health care, educational, and residential uses into the downtown area to support high quality business/retail activities and to increase the vitality of the downtown.
Policy LU-29	In the Downtown Mixed-Housing and Office designation, encourage infill development and redevelopment that provides a variety of housing types and professional office uses that may include innovative ideas and designs.
Policy LU-30	Promote a mix of uses, building forms, and public realm improvements within the Town Center, consistent with the current version of the Town Center Design Standards and Guidelines.
Policy LU-31	In the Mixed Commercial area of the downtown, encourage diverse employment opportunities and increased walkability and connectivity to portions of the downtown outside of the Town Center, while encouraging a mix of commercial and multi-story residential uses, with mixed use buildings, public uses and spaces, compatible food-related uses, still allowing for large format and auto-oriented retail, provided they are designed consistent with the current version of the Town Center Design Standards and Guidelines.
Policy LU-32	In the General Commercial designation, encourage a complete variety and mix of commercial and office uses, appropriate low-impact manufacturing and storage, transportation-related and utility facilities and limited residential use that can be buffered to ensure compatibility.

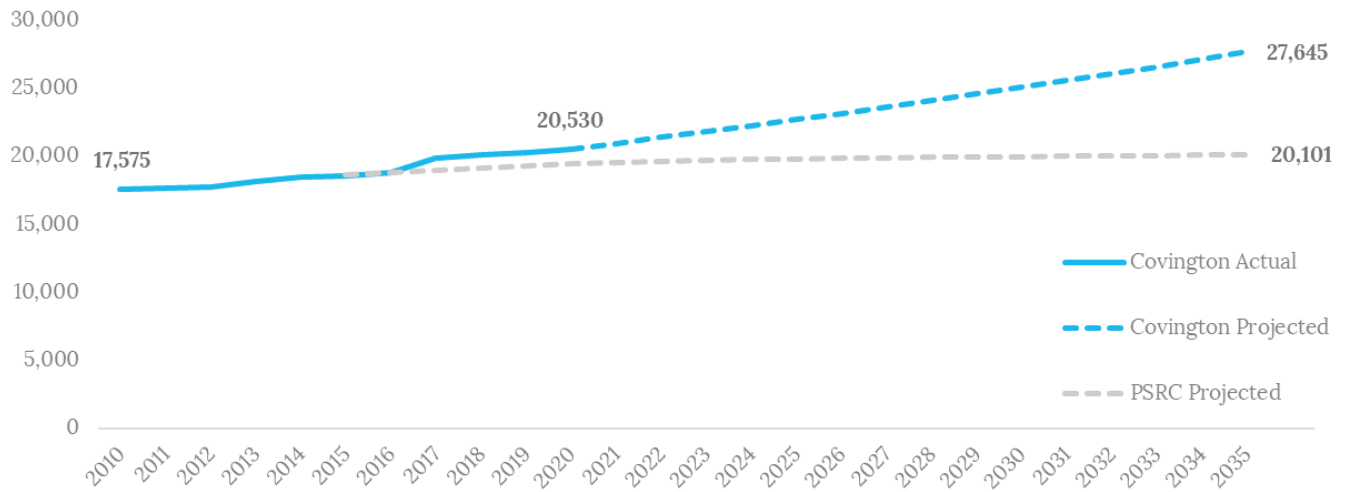
Goal/Policy Number	Goal/Policy Text
Policy LU-33	Encourage a development pattern that places buildings near the street and makes surface parking a non-dominant use.
Policy LU-34	Provide for a sense of gateway and entry to the downtown area through the development of key distinctive focal points, such as special signs, and architectural, water and/or landscaping features.
Policy LU-35	Encourage interconnected walkway systems to accommodate areas for landscaping and wide sidewalks that provide the opportunity for appropriate outdoor commercial and civic activities, including seating for food and beverage establishments.
Policy HO-4	Support the development of senior housing and long-term care/assisted living facilities in the downtown and other areas, in combination with or in close proximity to commercial uses and medical services and facilities.
Policy T-14	Provide efficient local access from regional transportation corridors to the downtown area.
Policy T-15	Enhance the attractiveness of the SR 18 right of way in accordance with its role as a gateway to the downtown area.
Policy T-16	Improve the street environment and appearance within the downtown area for use as public open space.
Policy ED-13	Encourage location of new higher-wage jobs in the downtown area and the Lakepointe Urban Village.

Source: (City of Covington, 2019)

## Growth Targets and Trends

The pace of population growth in Covington has been higher than projected in regional models but has been occurring within the framework of the City's adopted plans that focus growth in the city in centers like Downtown and in the future with the development of the Lakepointe Urban Village Subarea. Covington's 2020 population estimate surpasses PSRC's 2035 projections in the 2017 Land Use Vision (LUV) model. See Exhibit 3-14.

Exhibit 3-14: Population, City of Covington, 2000-2035 (projected).



Sources: WA OFM, 2020; 2015-2035 Covington Comprehensive Plan, 2; PSRC Land Use Vision, 2017; BERK, 2020.

Illustrating Covington’s robust growth, Covington has nearly met its 2035 housing growth target set in Countywide Planning Policies and reflected in the Covington Comprehensive Plan. The year of the targets is 2006-2031, and to meet the GMA requirements for a 20-year horizon the 2015 Comprehensive Plan periodic review extended the targets to 2035. The City has already exceeded its jobs growth target; see Chapter 5 and the Market Study in Appendix A for more information on job types. See Exhibit 3-15.

Exhibit 3-15. Growth Targets and Status 2020

	Housing Units	Employment
Covington Targets 2006-2031: Countywide Planning Policies	1,470	1,320
Remaining Target 2012-2031: 2014 Buildable Lands Report	1,096	172
Extended Target 2031-2035: Comprehensive Plan	235	211
Growth: 2012-2020 Housing / 2012-2029 Jobs	1,032	942
<b>Remaining Target 2019-2035: BLR</b>	<b>299</b>	<b>(559)</b>

Sources: (King County, 2016); (King County, 2014); (City of Covington, 2019); PSRC 2019; OFM 2020.

In the Comprehensive Plan Land Use Element, the City’s 2015-2035 land capacity results showed an ability to accommodate nearly 4,300 housing units and 4,500 jobs. Most residential capacity is in Downtown and Lakepointe Urban Village Subarea. Today the City’s remaining

capacity looking at parcel zoning and allowed densities is about 3,300 housing and 3,600 jobs as of today. This capacity exceeds the City's remaining growth targets illustrated in Exhibit 3-15. The City has capacity for growth targets and beyond per Exhibit 3-16.

### Exhibit 3-16. Covington Land Capacity Status 2020

	Housing Units	Employment
Parcel Capacity 2015: 2015-2035 Comprehensive Plan	4,286	4,496
Additional Growth 2015-2020 Housing / 2015-2019 Jobs	1,032	942
Remaining Capacity	3,254	3,554

Source: (City of Covington, 2019); PSRC and ESD 2018; OFM 2020.

Land capacity analysis for King County's Buildable Lands Report in 2021 is underway. Mapping prepared for the analysis identifies many Downtown Study Area parcels as redevelopable or vacant. Capacity for redevelopment is determined based on both a land-to-value ratio and a floor-area ratio-based density, as well as other factors. This analysis reveals capacity for reimagining portions of the Study Area as a denser and more walkable community. See Exhibit 3-17 and Exhibit 3-18.

### Exhibit 3-17. Preliminary Land Capacity Analysis 2020

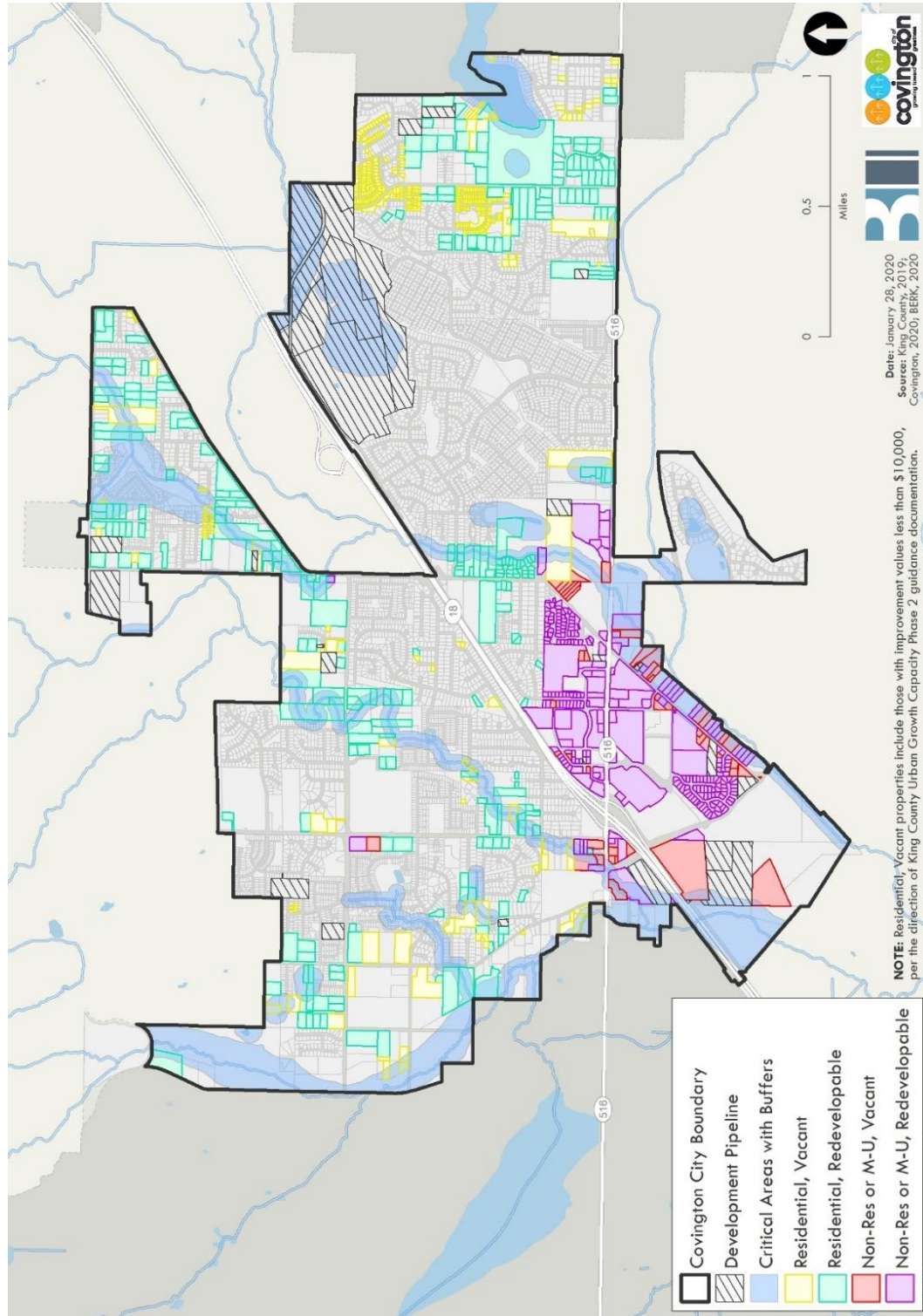
Zone	Gross Acres	Net Vacant Area	Net Redevelopable Area
<b>City Zones</b>			
Low Density Residential 4du/ac (R-4)	621.2	40.8	170.2
Medium Density Residential 6du/ac (R-6)	990.2	54.0	96.7
High Density Residential 8du/ac (R-8)	435.5	17.5	20.3
High Density Residential 12du/ac (R-12)	79.3	0.0	0.0
Multifamily Residential 18du/ac (R-18)	18.2	0.0	10.1
Mixed Residential (MR)	34.0	0.0	0.0
Urban Separator (US) 1du/ac (R-1)	387.5	11.9	19.2
Community Commercial (CC)	4.1	1.8	2.3
Neighborhood Commercial (NC)	4.0	0.0	0.2
Regional Commercial Mixed Use (RCMU)	89.4		62.4

Zone	Gross Acres	Net Vacant Area	Net Redevelopable Area
Industrial (I)	102.5	10.8	0.0
ROW	5.4	0.4	0.0
Water	54.6	0.0	0.0
<b>Subtotal: City Zones</b>	<b>2825.9</b>	<b>137.2</b>	<b>318.9</b>
<b>Downtown Zones</b>			
General Commercial (GC)	75.3	21.8	6.3
Mixed Commercial (MC)	200.1	10.0	91.3
Mixed Housing/Office (MHO)	56.7	0.0	23.0
Town Center (TC)	75.0	5.1	46.3
<b>Subtotal: Downtown Zones</b>	<b>407.1</b>	<b>36.9</b>	<b>166.9</b>
<b>Total</b>	<b>3,233</b>	<b>174.1</b>	<b>548.2</b>

Source: BERK 2020.



Exhibit 3-18. Covington Zoning and Land Capacity Analysis, January 2020



Source: King County, BERK 2020.

## SEPA Review

The City of Covington examines new development under the State Environmental Policy Act (SEPA). For development that is not exempt, the City reviews a checklist, typically considers a threshold determination like a Determination of Non-Significance, and proposes mitigation measures if there are significant adverse impacts and gaps in regulations. All permit proposals whether SEPA exempt or not are subject to Covington's critical area regulations, shoreline regulations as well as state regulations such as hydraulic permit approvals (State of Washington Department of Fish and Wildlife).

The City's SEPA categorical exemption levels are stated in CMC 16.10.090 and include 12,000 square feet of commercial area, 40 parking stalls, and 60 multi-family dwellings in three of the City's zoning districts applicable to Downtown (MHO, MC, and GC):

- (a) *The construction or location of any single-family residential structures of nine or fewer dwelling units;*
- (b) *The construction or location of any multifamily residential structures of 60 or fewer units located within the mixed housing/office (MHO), mixed commercial (MC), and general commercial (GC) downtown zoning districts and the R-18 multifamily zone;*
- (c) *The construction of a barn...;*
- (d) *The construction of an office, school, commercial, recreational, service or storage building with 12,000 square feet of gross floor area, and with associated parking facilities designated for 40 automobiles;*
- (e) *The construction of a parking lot designated for 40 automobiles;*
- (f) *Any landfill or excavation of 500 cubic yards throughout the total lifetime of the fill or excavation...provided, that the categorical exemption threshold shall be 250 cubic yards for any fill or excavation that occurs on a site that contains critical areas as defined in Chapter 18.65 CMC and the Shoreline Master Program, as amended.*

Exceptions to exemptions include lands underlying the water areas of the state below the ordinary high-water mark, and wetlands, though buffers and lands above the high-water mark

## SHORELINES

"Shorelines" means all of the water areas of the state, including reservoirs, and their associated shorelands, together with the lands underlying them; except (i) shorelines of statewide significance; (ii) shorelines on segments of streams upstream of a point where the mean annual flow is twenty cubic feet per second or less and the wetlands associated with such upstream segments; and (iii) shorelines on lakes less than twenty acres in size and wetlands associated with such small lakes. (RCW 90.58.030(2)(e))

are not included. (WAC 197-11-756) However, subdivisions where part of the parcel includes lands covered by water<sup>2</sup> are not allowed to be exempt. (WAC 197-11-800(6)(d))

Leveraging a grant received from the Washington State Department of Commerce, Covington is evaluating development of a new “form-based” code that will more effectively implement the community’s vision, respond to changes in the regional economy, and provide a catalyst for high-quality construction in the heart of Covington. The City is also preparing an Environmental Impact Statement (EIS) to evaluate impacts of adopting an infill exemption as allowed by the State Environmental Policy Act (SEPA) RCW 43.21c.229.

The EIS and subsequent infill exemption could allow development up to the allowed density and intensity of use in the Comprehensive Plan for the following land uses beyond the current categorical exemptions and across all Downtown zones:

- Residential development;
- Mixed-use development; or
- Commercial development up to sixty-five thousand square feet, excluding retail development.

The purpose is to encourage and support housing and mixed use development while understanding any impacts from the development and if necessary identifying mitigation measures that developers must consider as they design their development. The infill exemption would exclude development on lands covered by water<sup>2</sup> as described above.

## Key Findings and Planning Implications

- The study area is primarily commercial in nature with large parcels adjacent to smaller single family homes on SE Wax Road and several subdivisions on the north and south side of Downtown, all of which are currently zoned MHO.
- The City has a vision for a compact mixed use center that is still early in its progress towards a mixed use walkable character.
- The area south of SE Wax Road is flanked by Jenkins Creek, a shoreline of the state with wetlands and a floodplain. The Shoreline Master Program allows medium intensity uses and prefers adaptive reuse of homes given buildings are often within shoreline buffers or

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<sup>2</sup> See WAC 197-11-756: “Lands covered by water” means lands underlying the water areas of the state below the ordinary high water mark, including salt waters, tidal waters, estuarine waters, natural water courses, lakes, ponds, artificially impounded waters, and wetlands.... “Lands covered by water” does not include adjacent lands and designated buffers above the ordinary high water mark.

setbacks; a shoreline buffer applies. Critical area regulations also protect wetlands and streams with buffers.

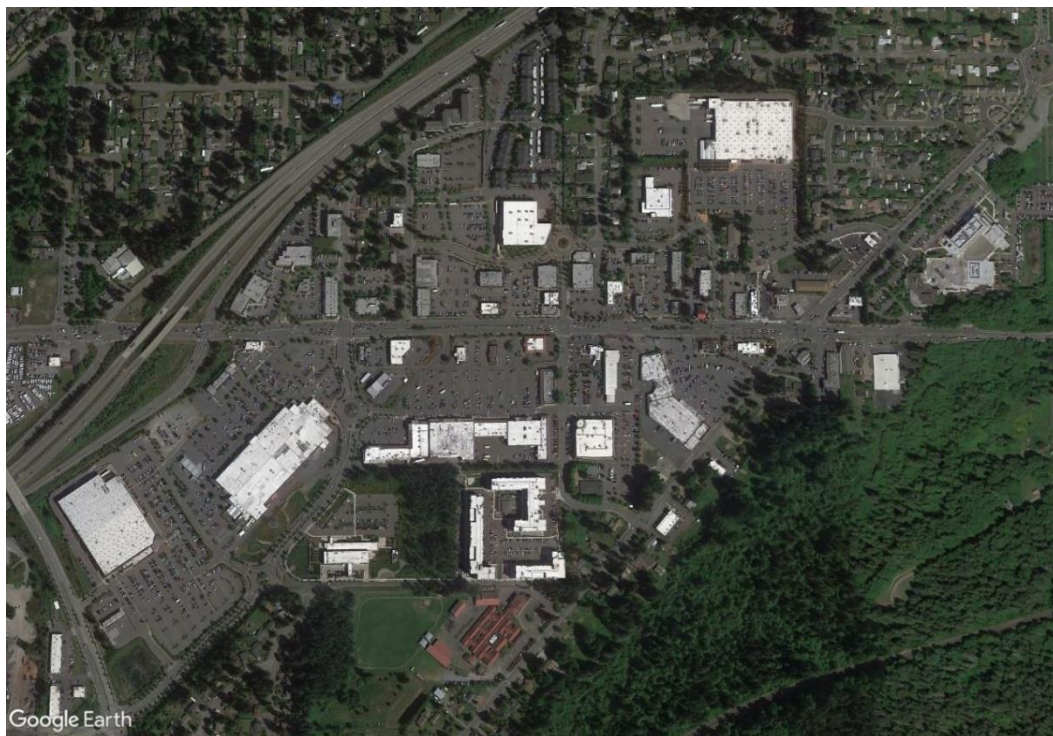
- When designing road and other circulation projects the City considers all applicable federal, state, and city policies and regulations, and improves environmental conditions where feasible. The City has implemented fish passage improvements and is designing road improvements in the Capital Facility Plan to address fish passage.
- SEPA provides for categorical exemptions including an infill exemption in areas that are similar to or below density and intensity goals of the Comprehensive Plan. This would not include lands covered by water including wetlands.

# 4 AESTHETICS AND URBAN DESIGN

## Existing Features

Covington's Downtown was shaped primarily by regional growth and market forces along State Routes 18 and 516. Over the last 40 years a pattern of low density, auto-oriented, strip commercial developed with limited amenities. This pattern still continues. See Exhibit 4-1.

Exhibit 4-1. Covington Downtown Aerial 2020



Source: Google Earth 2020

Over time, in addition to big box commercial uses, medical, and service uses also located in Downtown Covington. See range of photos in Exhibit 4-2.

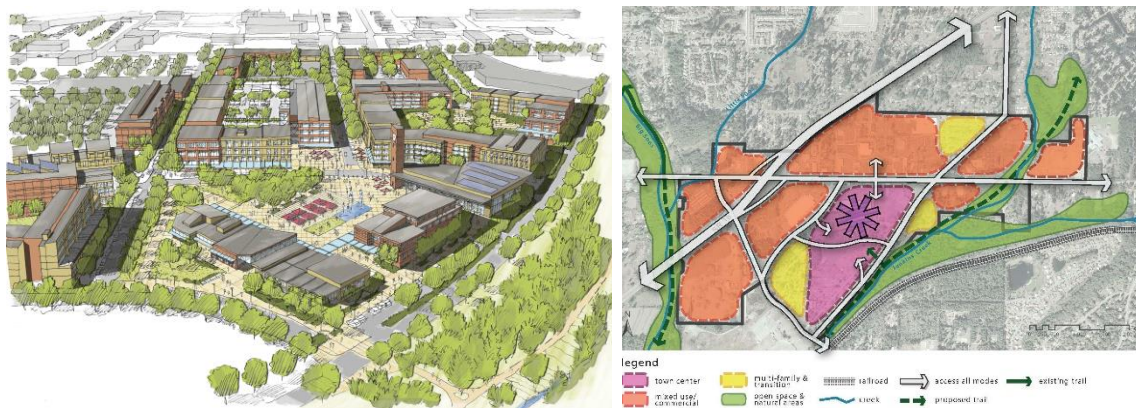
Exhibit 4-2. Example Downtown Covington Commercial and Medical Buildings 2014



Source: City of Covington 2014.

In 2010 Covington formally updated its vision for Downtown and adopted new design and development standards. Covington’s aspiration for Downtown is a vibrant human-scaled environment with walkable streets and trails, high-quality mixed-use, office, and commercial development, and attractive streetscapes. A town center, flanked by mixed use residential, commercial, and open space, with limited transitional residential areas, were conceptualized in 2009; see Exhibit 4-3 (pink + star).

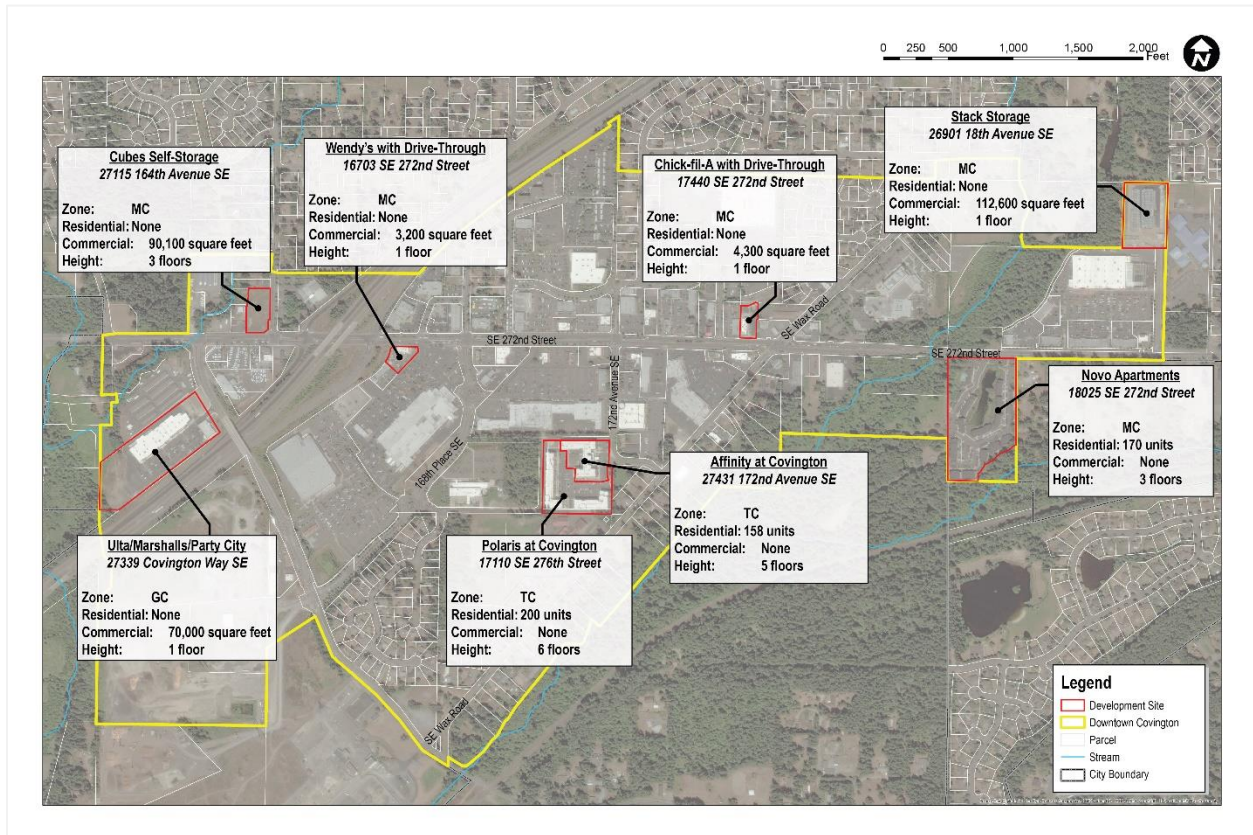
Exhibit 4-3. Town Center Schematic and Land Use Concept



Source: (City of Covington, 2009)2010 Downtown Plan and Zoning Study?

Development over the last five years from 2015-2020 has continued single-story commercial uses, but some multi-story residential development has been constructed. See Exhibit 4-4.

Exhibit 4-4. Recent Downtown Construction 2015-2020



Source: City of Covington 2020.

Examples of recent residential development show a greater height, perimeter landscaping, sidewalks, trail easements for future development, and progress towards mixed use. See Exhibit 4-5.

New commercial development has in some cases moved closer to street frontages and provided screened drive-throughs and screened solid waste areas. Other commercial development continues to setback far from streets with larger parking areas. See Exhibit 4-6.

Exhibit 4-5. Recent Housing Complexes in Covington



Source: Google Earth, 2020.

Exhibit 4-6. Recent Commercial Development



Source: Google Earth, 2020.



Concerns have been raised over both the quantity and quality of new development. Despite design standards in the Covington Zoning Code (CMC 18.31), the new commercial development:

- Only partially relates to public streets,
- Continues large areas of parking,
- Is inward focused and not designed to connect with existing or future planned uses or connections,
- Provides relatively small shares of landscaping, and
- Does not reflect substantial progress on the ultimate street grid.

Newer residential development:

- Includes building materials that does not weather well in some cases,
- Includes some surface parking areas with limited landscaping,
- Includes under building parking that effectively includes car and bike parking, but lacks visual treatments and transparency on interior courts, and
- Provides limited and poorly located on-site gathering and play spaces.

## Current Plans and Regulations

### Covington Comprehensive and Master Plans for Downtown

King County first designated Covington as an Urban Activity Center in its 1985 Comprehensive Plan due to its location near freeway access and sewer availability. Covington incorporated in 1997. Incorporation of Covington was approved by voters in November of 1996 and became effective August 31, 1997.

Ever since incorporation, Covington has identified the importance, gaps, and opportunities in Downtown:

- **1998 - Vision Plan for Covington** - Citizen input directed the City to improve the aesthetic and functional character of the Downtown.
- **2001 - Covington's First Comprehensive Plan** - The Vision Statement, adopted by City Council, says:

*The City of Covington is a place where community businesses and civic leaders are partners in building a city that is family-oriented, safe and pedestrian-friendly. A community that proudly invests in enhancing our small-town character and natural environment and provides diverse recreational opportunities as well as remaining*

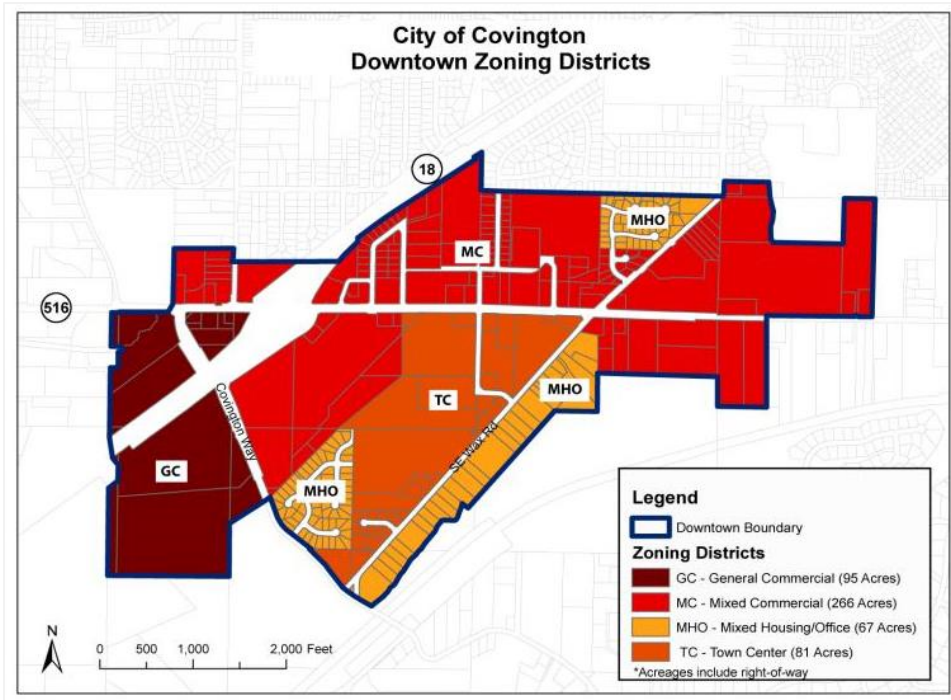
*financially responsible. We believe that the following elements are necessary to achieve this Vision: Covington will have a Downtown that is well-designed and pedestrian-friendly with a permanent combination of commercial and residential areas.*

- **2001 - Covington Business District (CBD) Plan** - The CBD Plan analyzed the state of Downtown and provided a strategy for building a more livable, pedestrian-friendly Downtown. A Downtown Element was included in Covington's first adopted Comprehensive Plan. The main challenge at that time, which continues today, is accommodating the demand for regional "big-box" retail while creating a walkable Downtown core.
- **2005 - Zoning map & code update** - The City refocused its efforts on future growth by guiding the bulk of development into the Downtown, creating new zoning designations to focus the most intense development into this core area. It also established development and street standards that would provide a more traditional grid system. This resulted in amendments to the Downtown Plan and the zoning regulations.
- **2010 - Adoption of the Downtown Element of the Comprehensive Plan, zoning map and code, and new design standards** - Begun in 2008, these efforts included the City Council's endorsement of the updated Downtown Plan and concluded with the adoption of development and design standards that remain in place today. This effort refined the vision to develop a focused Town Center area that will eventually contain a new City Hall, a new public plaza and public gathering space, new mixed-use buildings (combining commercial and residential), and centrally-located parking facilities. One or two new pedestrian-oriented streets are intended to become the "Main Street" and heart of Downtown.
- **2016 - Updated Comprehensive Plan that integrated the Downtown Element's goals and policies into the Land Use Element** - The effort reaffirmed the vision towards a sustainable and vibrant future with mixed-use commercial and residential mid-rise development patterns, gathering spaces, and connected multi-modal streets in the town center.

## Zoning Regulations

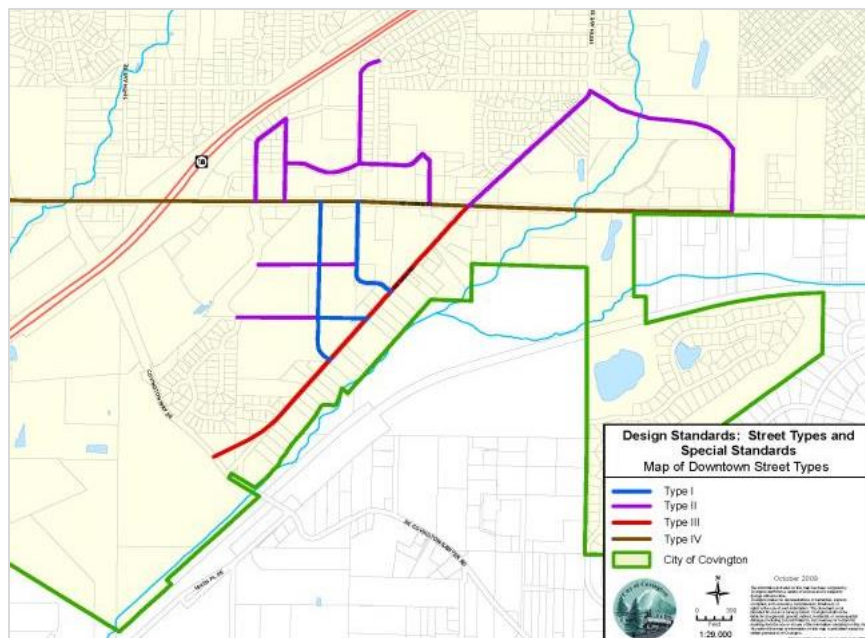
Covington's Downtown zoning regulations and design standards vary based on zone and street typologies. See Exhibit 4-7 and Exhibit 4-8.

Exhibit 4-7. Covington Downtown Zoning Districts



Source: Covington Municipal Code, Chapter 18.31

Exhibit 4-8. Town Center Streets



Source: Covington Municipal Code, Chapter 18.31

Building heights, floor area ratios, mixed use residential densities, and impervious area allowances are greatest in the Town Center zone, which is envisioned as the Downtown core. See Exhibit 4-9.

#### Exhibit 4-9. Downtown Zoning Standard Excerpt

Standards	Standards				Exceptions and Notes
	Town Center (TC)	Mixed Commercial (MC)	General Commercial (GC)	Mixed Housing Office (MHO)	
Maximum Building Height	75 feet	60 feet	55 feet	45 feet	Maximum height shall be 45 feet within 50 feet of any zone outside of the downtown zone. In the MHO district, the 35 feet maximum height shall also apply within 50 feet of another MHO property.
Maximum Residential Density (stand-alone)	Not Permitted	60 D.U./acre	48 D.U./acre	24 D.U./acre	For cottage housing, CMC <a href="#">18.37.040</a> shall control. Stand-alone residential structures are not permitted in the town center.
Maximum Residential Density (if ground floor is commercial)	Unlimited	Unlimited	Unlimited	24 D.U./acre	
Minimum Residential Density	32 D.U./acre	24 D.U./acre	24 D.U./acre	12 D.U./acre	Residential use is not required in the downtown. For cottage housing, CMC <a href="#">18.37.040</a> shall control.
Maximum Floor Area Ratio (FAR) with Bonus Features	4:1	3:1	3:1	2:1, 1.25:1 east of Wax Road	Refer to CMC <a href="#">18.31.100</a> for bonus features.
Maximum Floor Area Ratio (FAR) without Bonus Features	1.5:1	1:1	1:1	1:1; .75:1 east of Wax Road	No minimum FAR. Development within the Jenkins Creek Corridor shall utilize low impact development (LID) techniques as adopted in CMC <a href="#">13.25.020</a> .
Maximum Impervious Surface	80%	90%	80%	70%; 50% east of Wax Road and south of SE 272nd St.	Developments in the MHO located east of Wax Road and south of SE 272nd St., and cottage housing developments shall not exceed the 50% maximum impervious surface.

Standards	Standards				Exceptions and Notes
	Town Center (TC)	Mixed Commercial (MC)	General Commercial (GC)	Mixed Housing Office (MHO)	
Minimum Lot Frontage	Type I Street – 80%	Type II Street – 50%	Type IV Street – 40%	None	A building shall be located within 5 feet of the back of sidewalk or on a public plaza. Where utility easements greater than 5 feet exist, the building shall be set back to the extent of the easement and this area shall be designed as an extension of the sidewalk and/or may be included as part of the public space requirement.
Occupied by a Building	Type II Street – 50%	Type IV Street – 40%			
	Type III Street – 50%				
	Type IV Street – 40%				

Source: Covington Municipal Code, Chapter 18.31

A code audit has been prepared to support the present effort to develop a Form-Based Code. See Appendix B. The two primary items are Chapter 18.31 of the Covington Municipal Code and the Downtown Design Guidelines and Standards. The audit is ongoing, and initial findings include:

- The code and guidelines include multiple provisions for open-ended flexibility that have the potential to degrade development’s ability to implement Downtown’s vision.
- There is a significant amount of duplication internally and with other chapters of the Municipal Code.
- Many design topics that affect construction quality are either not addressed or are not discussed in enough detail, such as outdoor lighting, landscaping design, resident recreation areas, and pedestrian trails. Some areas need updates based on modern construction practices, like window design and wall materials.
- The Design Guidelines and Standards have some good photographs and graphics to show examples but could be improved and clarified. Including bad examples (what NOT to do) can also be very useful.
- Some standards are very rigorous and may not be realistic or come at significant cost to builders with little benefit to the public. Adding more clarity and alternative design options could help achieve balance between private and public interests.
- Many decisions are delegated to the Community Development Director, but clear criteria for approving unique designs are lacking.

## Key Findings and Planning Implications

- Covington's Downtown urban form began 40 years ago with an auto-oriented commercial form that still largely persists.
- Upon incorporation in 1997 through 2010 the City planned a more cohesive Downtown with a town center, gridded streets, and mixed use development.
- Over time, new development has made progress but has not realized the vision of the Downtown.
- A form-based code is underway to focus on form and relationship of buildings to the public realm – streets and gathering spaces among other items – to improve development quality.

# 5 SOCIO-ECONOMICS

## Existing Features

### Population, Housing, and Jobs

As of 2019, Downtown Covington is home to 2,438 residents within about 1,062 housing units.<sup>3</sup> As of 2018, Downtown also contains 3,781 jobs per covered employment estimates, with most consisting of services (46%) and retail (44%). The other job types include: government and education (5%), FIRE (2%), and industrial and construction (2%).<sup>4</sup>

Downtown makes up 12% of Covington's population, 15% of Covington's housing units, and 71% of Covington's jobs. While the Downtown represents Covington's job center, the area has yet to evolve as a mixed use area with both commercial uses as well as a range of residential housing types

Between 2015 and 2020, several residential projects have been developed or are pending:

- 2015-Affinity at Covington (55 year+ senior community): 158 units
- 2015-Polaris at Covington: 200 units
- 2016-Novo Apartments 170 units
- Pending-Station by Vintage: 198 units

The Downtown has grown by over 1,300 in population since 2010. While a large share of growth has occurred in the Downtown, most of the City's population is located outside of Downtown. See Exhibit 5-1.

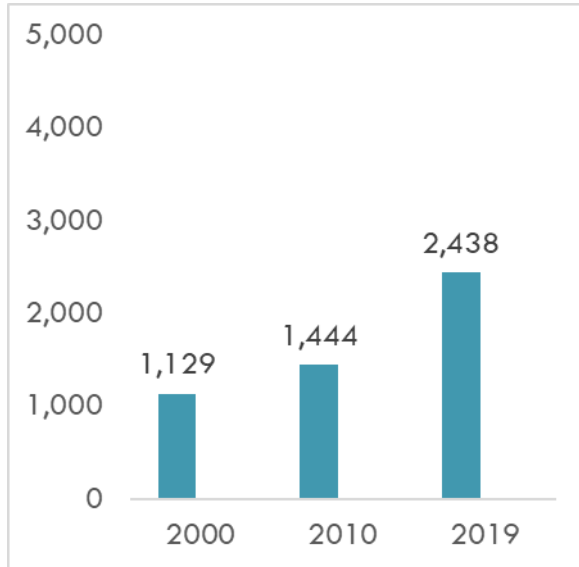
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<sup>3</sup> Statistics are based on ESRI Business Analyst, June 2020 for the study area boundary itself. Similar results are found for dwelling units comparing to Assessor Records which shows about 1,040 dwellings as of September 2019 parcel data.

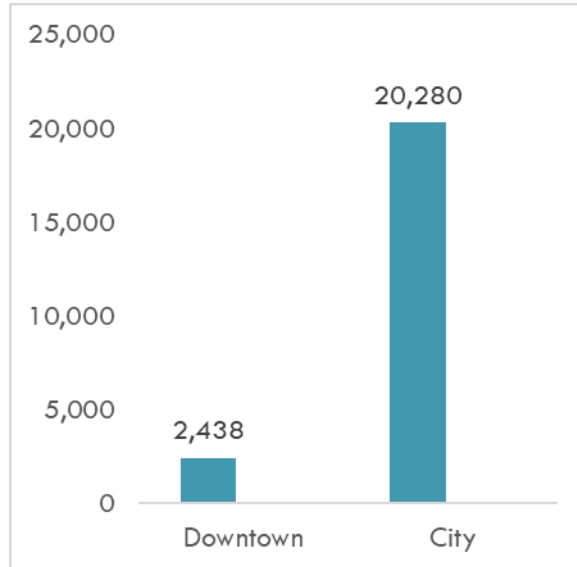
<sup>4</sup> State of Washington Employment Security Department (ESD), and Puget Sound Regional Council (PSRC) for year 2018. FIRE = finance, insurance, and real estate.

**Exhibit 5-1. Downtown Population**

**Downtown Growth 2000-2019**



**Downtown and Citywide Population 2019**



Source: State of Washington Office of Financial Management, 2019; ESRI Business Analyst 2020; BERK, 2020.

**Demographics**

The median age of the community as a whole has increased since 2010, as well as in Downtown. The Downtown median age is higher than the city as a whole, both before and after the development of senior housing in Downtown. The median age in 2019 is higher than the County and State as well. The median age in 2010 was more similar to the County and State as a well. The city’s two age-restricted apartment developments are both located Downtown. Covington Place Senior Apartments was built in 2008 with 121 units. More recently, Affinity at Covington was constructed with 156 units in 2015. See Exhibit 5-2.

**Exhibit 5-2. Median Age**

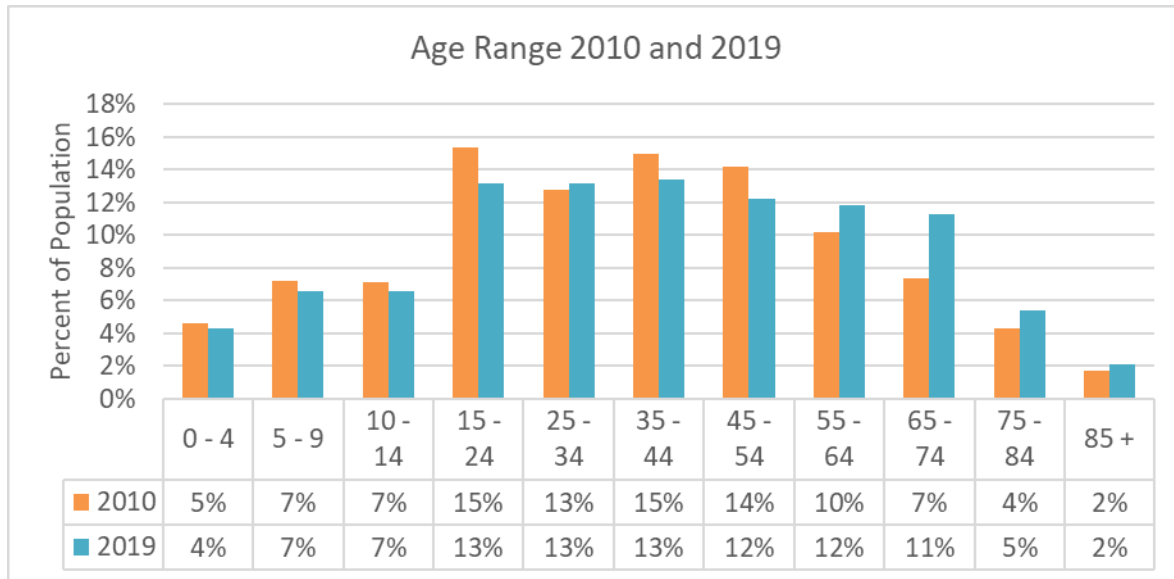
Year	City	County	State	Year	Downtown
2010	33.8	37.0	37.2	2010	37.1
2018	36.9	36.8	37.7	2019	39.8

Sources: American Community Survey B02001 5-Yr Estimates, 2010 & 2018; ESRI Business Analyst, June 2020; BERK, 2020.



Between 2010 and 2019, the Downtown Study Area age range has trended towards persons 55 years and older, likely increased due to the development of apartments for persons 55 years and older. See Exhibit 5-3.

**Exhibit 5-3. Age of Downtown Population 2010 and 2019**



Sources: ESRI Business Analyst, June 2020; BERK, 2020.

The study area share of males and females has stayed consistent with a greater share of female residents, whereas in the city as a whole, the female share has reduced. See Exhibit 5-4.

**Exhibit 5-4. Male and Female Share in City and Downtown**

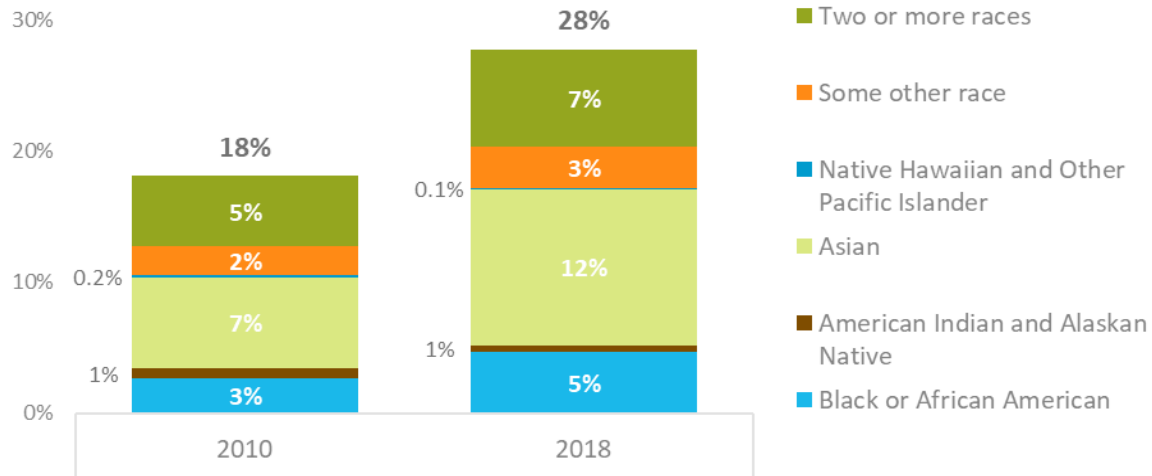
City	2010	2018	Downtown	2010	2019
Male	49.9%	51.4%	Male	46.5%	46.7%
Female	50.1%	48.6%	Female	53.5%	53.3%

Sources: American Community Survey B02001 5-Yr Estimates, 2010 & 2018; ESRI Business Analyst, June 2020; BERK, 2020.

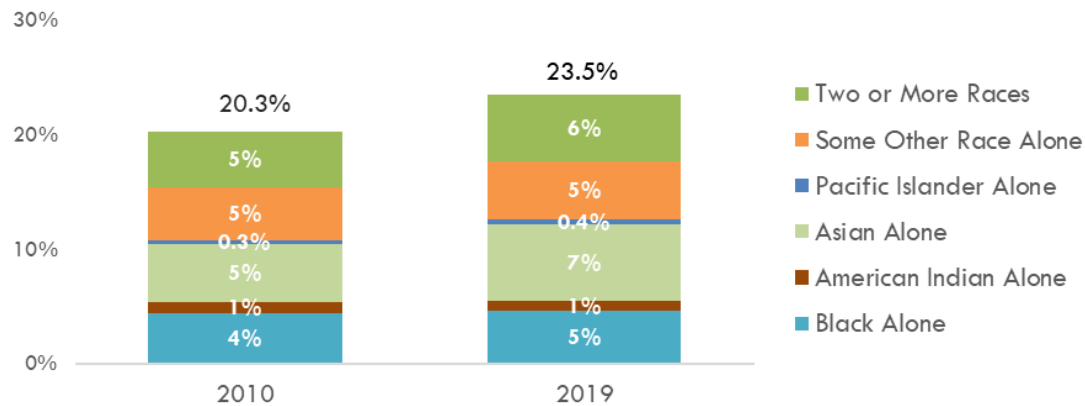
The study area has become more racially diverse between 2010 and 2019, but the shift citywide towards more diversity has been even greater. See Exhibit 5-5.

Exhibit 5-5. Non-White Race Shares in City and Downtown

Citywide 2010-2018



Downtown: 2010-2019



Sources: American Community Survey B02001 5-Yr Estimates, 2010 & 2018; ESRI Business Analyst, June 2020; BERK, 2020.

Persons of Hispanic origin, which may be of any race, make up more of the Downtown population than the citywide population. See Exhibit 5-6.

Exhibit 5-6. Persons of Hispanic Origin, Share of Population

	Citywide 2018	Downtown 2019
Hispanic Origin	8.2%	10.3%

Sources: American Community Survey B02001 5-Yr Estimates, 2010 & 2018; ESRI Business Analyst, June 2020; BERK, 2020.

Downtown has a lower median household income than the city as a whole, the County, or the state. See Exhibit 5-7. This is likely due in part to Downtown’s higher share of senior citizens. As well, there are around 530 income-restricted apartments in Downtown.

**Exhibit 5-7. Median Household Income 2018**

State (2018)	King County (2018)	Covington (2018)	Downtown (2019)
\$70,116	\$95,009	\$98,687	\$62,083

Sources: American Community Survey B02001 5-Yr Estimates, 2018; ESRI Business Analyst, June 2020; BERK, 2020.

**Opportunity Index**

The Puget Sound Regional Council (PSRC) has developed an opportunity index identifying whether people living in a census tract have more or less access to opportunities for education, employment, housing, mobility, and health/environment. The Downtown area tract is shown as having a very low opportunity index compared to the rest of the county and other parts of Covington.

The Downtown’s education, economic access, and mobility are considered “moderate” and access to health and environment are “very high” but housing and neighborhood quality are considered “very low”. See the sidebar for the factors. See the map in Exhibit 5-8.

**DOWNTOWN OPPORTUNITY INDEX FACTORS – PUGET SOUND REGIONAL COUNCIL JULY 2019**

**Education: Moderate**

- Reading test scores, math test scores, student poverty, teacher qualifications, graduation rates

**Economic Health: Moderate**

- Access to living wage jobs, job growth, unemployment rates

**Housing and Neighborhood Quality: Very Low**

- Housing vacancy rates, housing stock condition, crime index

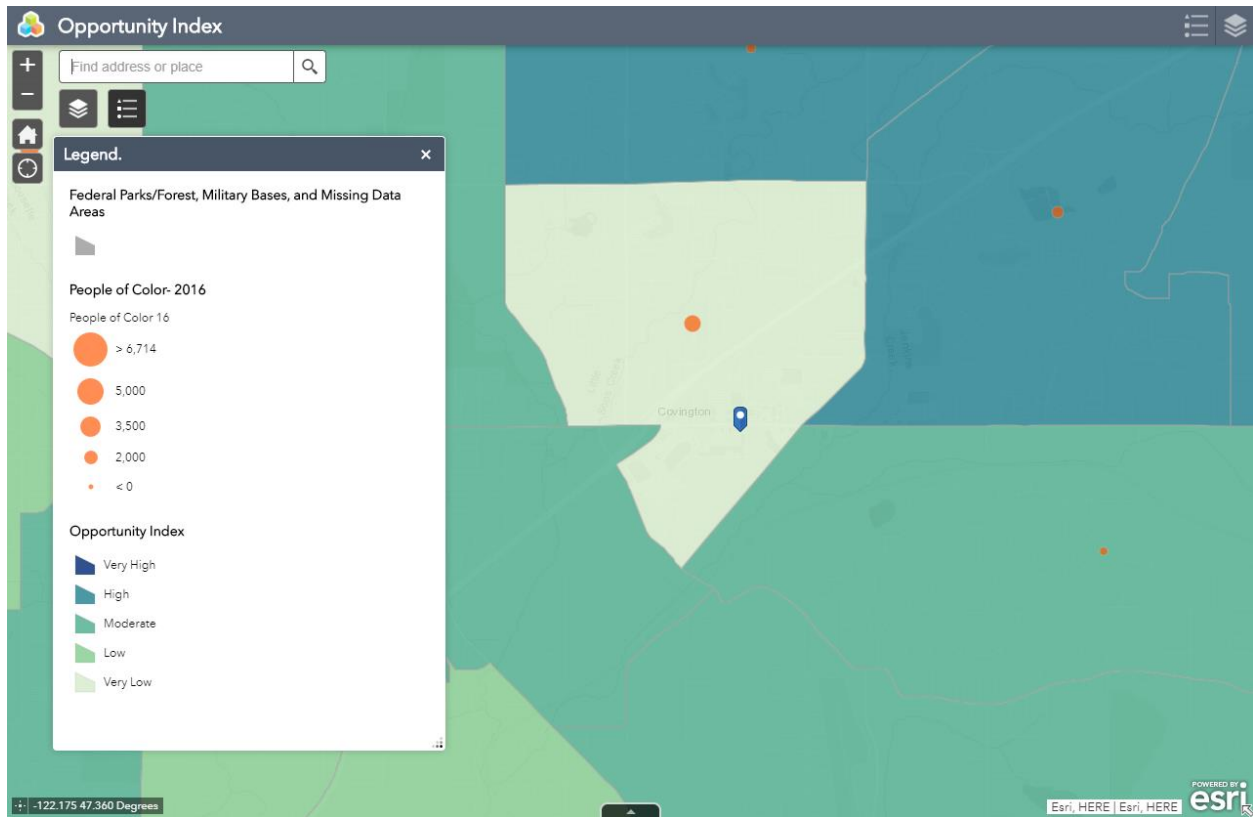
**Mobility and Transportation: Moderate**

- Drive commute cost, access to transit, transit fare cost, walkability (% walk to work)

**Health and Environment: Very High**

- Proximity to park/open space, access to healthy food, proximity to toxic site release

## Exhibit 5-8. Opportunity Index



## Market Study Findings

A market study of Downtown in the context of Covington and the region has been prepared and is attached to this Existing Conditions Report. Findings include:

- **The Study Area is the commercial hub of Covington.** The market reach of its retail offerings and medical services extend beyond its borders and to southeast King County.<sup>5</sup> This established presence can be leveraged as the City rethinks the Downtown identity, incorporating more mixed-use developments, walkability, and density.
- **Land use in the Study Area is heavily weighted toward commercial activity.** Stimulating mixed use development in the Town Center with a greater density of residential properties and mix of non-single-family properties for rent or ownership and public amenities, such as

<sup>5</sup> The 2012 Northern Gateway Study included a market study illustrating that northeast Auburn, eastern Kent, and the cities of Maple Valley and Black Diamond as well as surrounding rural areas were in Covington's market area.

open space/parks, and other civic uses, would enhance the district's balance of services and offerings. Presently, there is a prevalence of corporate chain type commercial establishments – with very limited locally-owned independent businesses. There is opportunity with shifting trends to add smaller and local businesses (see below).

- **Covington residential property values are higher than many local workers can afford, and multifamily opportunities are limited.** The City's housing stock is dominated by single family homes. Options for affordable home ownership or multifamily rental housing are limited. Housing types, well designed and located styles are affordable for workers who earn a moderate wage would help diversify the housing stock and promote livability in Downtown.
- **Rental rates in the Study Area are competitive with county-wide averages, with room for growth in multifamily residential.** Study Area properties perform well in terms of vacancy across use types. Rental rates are not particularly high, however, when compared with King County averages, especially for multifamily residential. This may be attributed to the limited amount of new, market rate multifamily housing, auto-oriented built form, and Covington's distance from higher rent submarkets such as the central business districts of Seattle and Bellevue that skew the countywide average. Market indicators, such as household income, show promise for raising the profile of residential and commercial offerings.
- **The real estate market is shifting.** Commercial real estate, including retail and office, was already shifting in the face of multiple trends. The Covid-19 pandemic is likely to accelerate and intensify these trends leading many to innovate or change their operating models. Overall, consumer demand is shifting away from products to experiences, and to the mixing or convergence of many uses. Lifestyle centers, which add housing above retail, and office space nearby, are more popular than single-use retail shopping centers. Retail space is becoming more adaptive, and adding civic uses such as libraries, in addition to residential, or even flex or warehouse space. Placemaking will play a large role in shaping experiences in these evolving formats, both for shoppers and for workers. Local businesses and social places like pubs and similar places could fit the trend towards entertainment.
- **Covington should explore opportunities to retool development regulations to give the market flexibility to respond to shifting trends provided the development creates a compact, pedestrian-friendly environment that is key to long-term economic success.** Development regulations should be tailored to desired development styles for new buildings, as the market may otherwise continue with existing patterns. Local government tools such as market incentives, design standards, and amenity investments can contribute to achieving the desired walkable, mixed-use form for the Study Area's future growth.

# Current Plans and Regulations

The Comprehensive Plan includes Housing Element and Economic Development Element plans and policies promoting a mixed use character in the Downtown with residential, retail, services (particularly medical), and gathering space, transit, pedestrian, bicycle, and other amenities. See Exhibit 5-9.

## Exhibit 5-9. Housing and Economic Development Policies

Goal/Policy Number	Goal/Policy Text
Housing Element – Housing Plan	<ul style="list-style-type: none"> <li>▪ Invest in residential neighborhoods</li> <li>▪ Promote housing variety in Town Center and Lakepointe urban village.</li> <li>▪ Promote excellence in design and compatibility in new higher-density housing and mixed-use development.</li> <li>▪ Promote expanded transportation access and economic prosperity.</li> <li>▪ Offer effective human services through partnerships.</li> <li>▪ Create sustainable environments that promote active living.</li> </ul>
Policy LU-27	Encourage a variety of development in the downtown with an emphasis on multi-story mixed-use, while allowing existing, major retail components to remain until market conditions support redevelopment; allow limited, regulated, and high-quality designed large format retail while minimizing impacts on adjacent residential neighborhoods.
Policy LU-28	Encourage the integration of new office, service, health care, educational, and residential uses into the downtown area to support high quality business/retail activities and to increase the vitality of the downtown.
Policy HO-2	<p>Allow for a variety of housing types, densities, and lot sizes, including mixed use development, small and large lot single family development, manufactured housing, accessory dwelling units, townhomes, duplexes, apartments, and condominiums.</p> <ol style="list-style-type: none"> <li>A. Encourage mixed-use developments with apartments and condominiums above commercial uses in the Town Center and the Lakepointe Urban Village. Promote market-rate, affordable, and special-needs housing with quality gathering space, transit, pedestrian, bicycle, and other amenities to meet community needs.</li> <li>B. Promote a range of lot sizes in residential land use designations implemented by associated zones.</li> <li>C. Allow accessory dwelling units in single family areas to support compatible affordable housing that benefits homeowners and tenants.</li> <li>D. Allow for designated manufactured homes on single family lots.</li> <li>E. Allow housing that provides quality homeownership and rental options such as cottages and townhomes.</li> </ol>

Goal/Policy Number	Goal/Policy Text
Policy HO-4	Support the development of senior housing and long-term care/assisted living facilities in the downtown and other areas, in combination with or in close proximity to commercial uses and medical services and facilities.
Economic Development Element – Plan	<ul style="list-style-type: none"> <li>▪ Continue to actively support existing retail and service businesses.</li> <li>▪ Expand the local economy by building on existing strengths in the retail and service sectors.</li> <li>▪ Diversify the local economy by targeting expansion of the office market, especially the burgeoning medical sector.</li> <li>▪ Make it easier to live and work in Covington.</li> <li>▪ Promote postsecondary educational opportunities for residents.</li> <li>▪ Retain an efficient, fiscally-sustainable strategy of economic development.</li> </ul>
Policy ED-13	Encourage location of new higher-wage jobs in the downtown area and the Lakepointe Urban Village.
Policy ED-17	<p>Develop downtown, neighborhood, community, and regional commercial uses with coordinated provision of:</p> <p>A. Adequate transportation, pedestrian, and utility infrastructure.</p> <p>B. Development and design standards to encourage mixed-use, commercial, and residential developments.</p> <p>C. Incorporation of trails, open space, and parks consistent with city plans and regulations.</p>

Source: (City of Covington, 2019)

## Key Findings and Planning Implications

- Covington’s Downtown population has grown substantially in the last 10 years by 69%, but is just about 12% of the city’s population.
- Covington’s Downtown has a higher share of Hispanic population than the City as a whole, the City overall is a little more diverse racially than Downtown.
- Downtown has a population greater in age and lower in income than the rest of the city.
- The area is seen as having a very low opportunity to positive life outcomes, due to existing housing and neighborhood quality, which can be addressed by greater housing variety and design standards and connection to the local and regional economy.
- Based on a market study (Appendix A), Covington should explore opportunities to retool development regulations to give the market flexibility to respond to shifting trends provided the development creates a compact, pedestrian-friendly environment that is key to long-term economic success.

# 6 TRANSPORTATION

## Existing City Plans and Documents Reviewed

The following documents were reviewed as a basis for this section:

- City of Covington Comprehensive Plan 2015-2035, January 2016, updated through 2019
- Covington Municipal Code Chapter 18.31 Downtown Development and Design Standards, 2020
- City of Covington, Parks, Recreation and Open Space Plan, 2016 Update
- Town Center Economic Impact and Infrastructure Cost Study, June 2014
- Downtown Design Guidelines and Standards, April 2014
- Covington Downtown Plan and Zoning Study, September 2009
- Transportation Assessment and SWOT Analysis Memo by Nelson Nygaard, April 2009

## Existing Features

### Functional Classification

The different types of streets that serve these functions are reflected through the Federal Functional Classifications. Covington streets are classified as Freeway, Principal Arterial, Minor Arterial, Major Collector. Functionally classified roads in Covington's Downtown include:

- Freeway: State Route (SR) 18
- Principal Arterial: SR 516 (SE 272<sup>nd</sup> Street) West of SR 18
- Minor Arterial: SR 516 (SE 272<sup>nd</sup> Street) East of SR 18
- Major Collector: Covington Way SE, 174th Ave SE, SE Wax Road, and 180<sup>th</sup> Avenue SE

The City provides design standards for non-classified local roads.

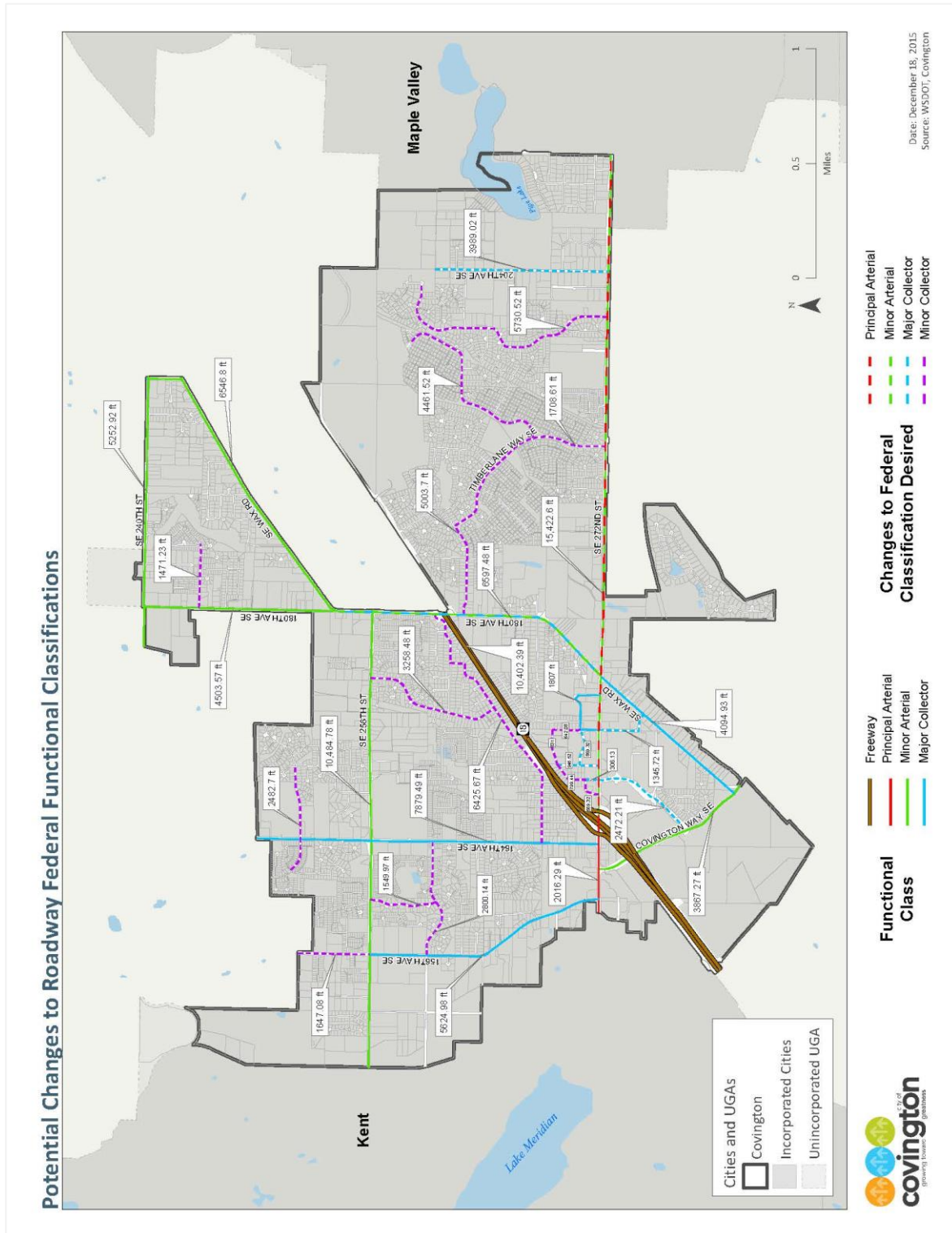


The City is proposing changes to its Federal Classifications and incorporating more streets in Downtown. See Exhibit 6-1.

Freeways and arterials have a higher mobility function with more limited access. Local access streets primarily provide access to adjacent residential and commercial development, and serve a limited mobility (e.g. through trip) function. Collectors tend to provide more balanced access and mobility functions.

As currently designed SR 516 impedes multi-modal circulation between north and south Downtown, and should be improved through the implementation of context-sensitive design features that promote the viability and vibrancy of a mixed-used Downtown area.

Exhibit 6-1. Covington Street Functional Classification Map with Recommendations (2015)



Source: (City of Covington, 2019)

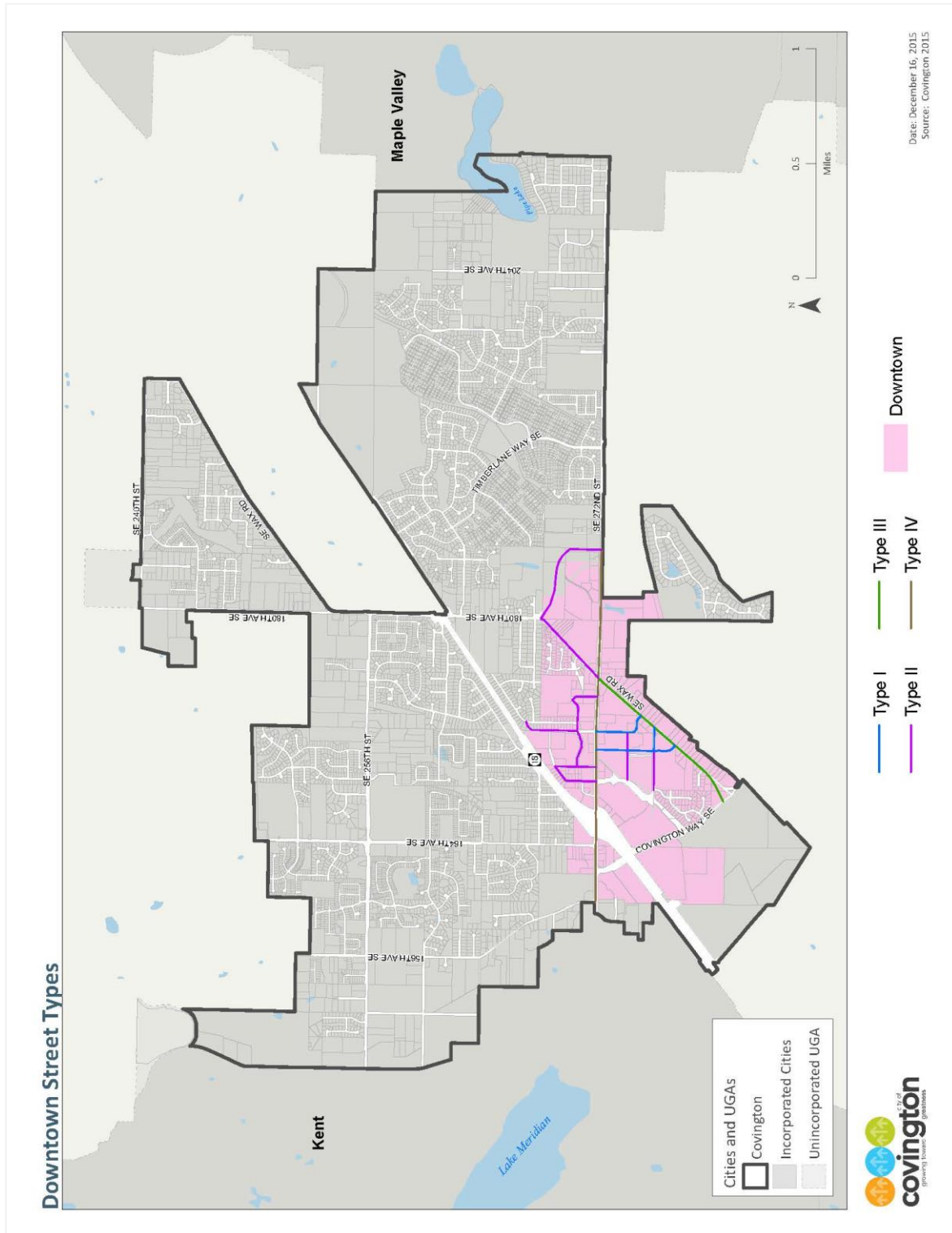
Through the 2010 code amendments the City has also identified four Downtown street types—labeled Type I, II, III or IV that primarily reflect different non-motorized and transit mobility goals. See Exhibit 6-2 and Exhibit 6-3. The Downtown street types are not correlated with functional classifications—they have been identified for a mix of arterial, collector and local streets, and overlay the functional classifications.

**Exhibit 6-2. Description of Downtown Street Types**

Downtown Street Type	Primary Function
Type I	Pedestrian-oriented street with two driving lanes, on-street parking and minimum 10-foot clear walkway.
Type II	Pedestrian, bicycle, and vehicle-oriented street with two driving lanes, on-street parking, center landscaped median, bicycle facilities and minimum 8-foot clear walkway.
Type III	Pedestrian, bicycle, and vehicle-oriented street with landscaped boulevard with two driving lanes, center landscaped median, bicycle facilities, minimum 15-foot clear walkway, and amenity zone.
Type IV	Major arterial street with four driving lanes, center median, transit access lane, no on-street parking, 6-foot landscape buffer and minimum 8-foot clear walkway.

Source: (City of Covington, 2019)

Exhibit 6-3. Covington Downtown Street Type Map






Source: (City of Covington, 2019)

## Non-Motorized Transportation

The City established pedestrian facility level of service standards in the 2015 Comprehensive Plan, summarized in Exhibit 6-4 below, that are applied to all Arterial and Collector streets, as well local access streets and other corridors that serve higher pedestrian generators (such as parks or schools), as identified by the Director of Public Works.

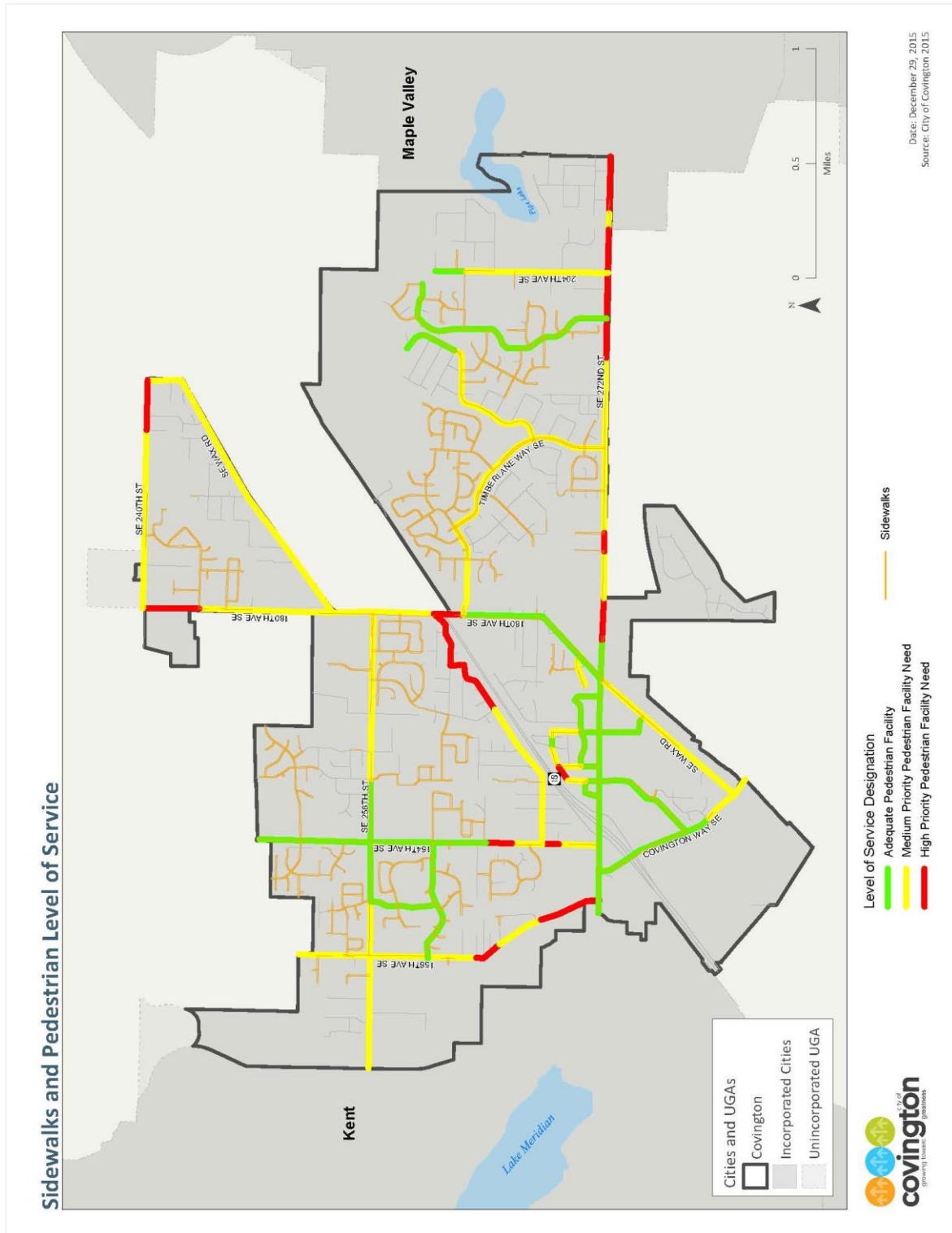
**Exhibit 6-4. Walkway Level of Service Standards**

Pedestrian Facility Standard <sup>1</sup>	Definition
	<p><b>Adequate pedestrian facility:</b> Existing pedestrian facility meets City standards and non-motorized goals – no improvements identified.</p>
	<p><b>Medium-priority pedestrian need:</b> Pedestrian facility exists but does not meet City standards and/or non-motorized goals [e.g. narrow sidewalk, shoulder only (≥5 feet wide) or sidewalk on one side of the street when standards call for both sides] – upgraded facility desired.</p>
	<p><b>High-priority pedestrian need:</b> No pedestrian facility exists (or existing shoulder &lt;5 feet wide) – based on City standards and/or non-motorized goals, a gap in the walkway network is identified and a new facility is desired.</p>

1. Applies to all Arterial and Collector streets, as well as local access streets and trail corridors identified by the Director of Public Works as warranted by adjacent land use.  
Source: City of Covington, 2015

Exhibit 6-5 shows the location existing pedestrian facilities in Covington and the level of adequacy based upon the walkway level of service standards. In the Downtown vicinity, most roads are considered to have adequate pedestrian levels of service, except for SE Wax Road and a few others considered to have a medium priority pedestrian need and a few with a medium-priority need.

Exhibit 6-5. Covington Sidewalk Inventory and Pedestrian Level of Service Map



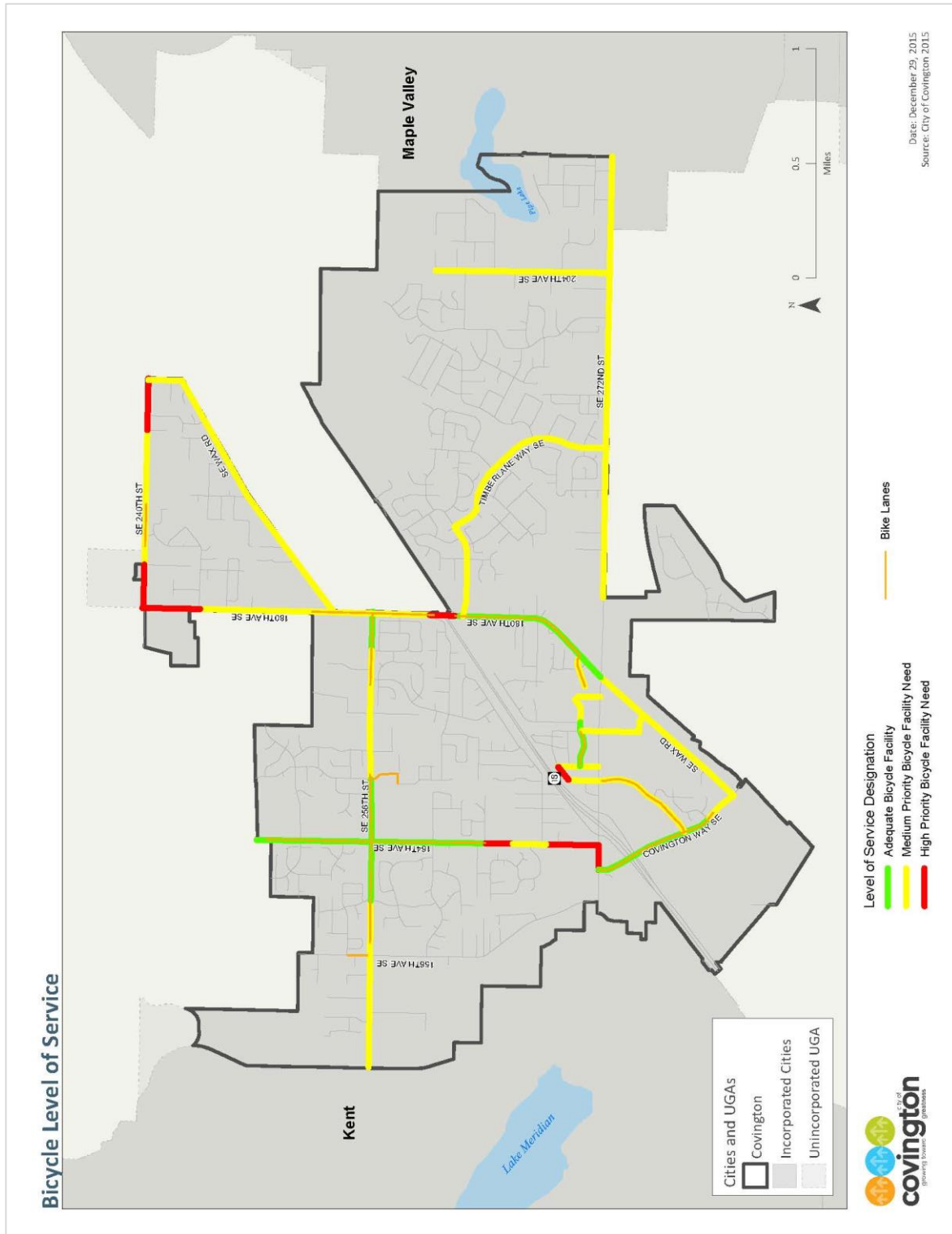
Source: (City of Covington, 2019)

The City has established bicycle facility level of service standards in the 2015 Comprehensive Plan that are applied to all Arterial and Collector streets, as well local access streets and other corridors that serve higher pedestrian generators (such as parks or schools), as identified by the Director of Public Works.

Exhibit 6-6 shows the location of existing bicycle facilities in Covington, and the level of adequacy based upon the walkway level of service standards. There are mostly medium-priority bicycle facility needs in Downtown.

See Exhibit 6-6 and Exhibit 6-7 below.




Exhibit 6-6. Covington Bicycle Inventory and Level of Service Map



Source: (City of Covington, 2019)



Exhibit 6-7. Bicycle Facility Level of Service Standards

Bike Facility Standard <sup>1</sup>	Definition
	<p><b>Adequate bicycle facility:</b> Existing bicycle facility meets City standards and non-motorized goals, OR, street identified for shared use by vehicles and bicycles – no bicycle improvements identified.</p>
	<p><b>Medium-priority bicycle facility need:</b> Bicycle facility exists but does not meet City standards and non-motorized goals – upgraded facility desired.</p>
	<p><b>High-priority bicycle facility need:</b> Based on City standards and non-motorized goals, a gap in the bicycle network is identified and a new facility is desired.</p>

1. Applies to all Arterial and Collector streets, as well as local access streets and trail corridors identified by the Director of Public Works as warranted by adjacent land use.  
Source: City of Covington, 2015

## Transit

As a relatively small community that is not designated by PSRC as an urban or regional center, Covington has not been a regional priority for improved transit service. In 1998, Covington’s City Council passed a resolution requesting that the Sound Transit board exclude the city from the Regional Transit Authority(RTA) boundaries (aka Sound Transit service area). The Sound Transit Board passed a resolution that granted that request. As a result, bus service in Covington is provided by King County Metro (Metro) Routes 159 and 168.





- **Metro Route 159** provides weekday commuter service, with five buses that travel from Covington to Kent and downtown Seattle in the morning, and four buses that travel back to Covington from downtown Seattle and Kent in the evening.
- **Metro Route 168** provides daily local bus service between Maple Valley, Covington, and Kent. Buses operate at about 30-minute headways (time between buses) during weekdays and 60-minute headways during evenings and weekends. This route stops at Kent Station, where riders can transfer to or from the Sound Transit Sounder commuter train or buses that serve other regional destinations.

Although transit service is not under Covington’s control, the City has established transit level of service standards in the 2015 Comprehensive Plan. See Exhibit 6-8.

The transit level of service standards provide a means for identifying corridors where the City intends to focus on increased land use densities and amenities to support future transit, and to

help facilitate communication with Metro regarding corridors where future transit improvements should be considered.

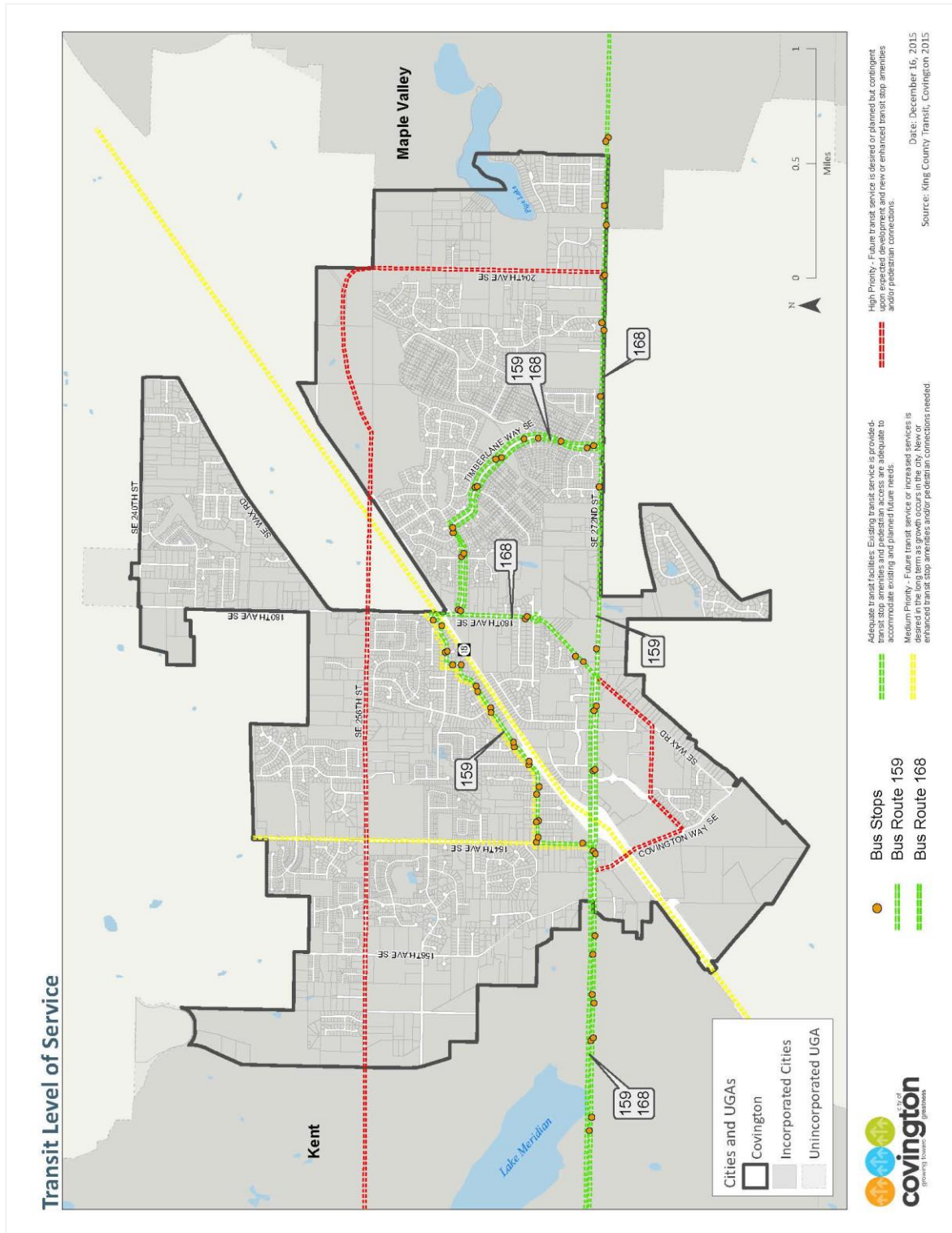
Exhibit 6-8. Transit Level of Service Standard

Transit Standard	Definition
	<p><b>No existing or planned future transit service.</b></p>
	<p><b>Adequate transit facilities:</b> Existing transit service is provided – transit stop amenities and pedestrian access are adequate to accommodate existing and planned future needs.</p>
	<p><b>Medium priority transit need:</b> Existing transit service is provided, and adequate pedestrian connections are in place, but additions or upgrades to transit stop amenities are desired.  -OR- Future transit service is desired to support mid- to long-term higher density development, and a new or enhanced transit route, transit stop amenities, and/or pedestrian connections are needed to support that service.</p>
	<p><b>High priority transit need:</b> Existing transit service is provided, and improvements are needed to address inadequate pedestrian connections; additions or upgrades to transit stop amenities may also be desired.  -OR- Future transit service is identified to support near-term higher density development, and a new or enhanced transit route, transit stop amenities, and/or pedestrian connections are needed to support that service.</p>

Source: City of Covington, 2015

Exhibit 6-9 shows the existing bus routes within Covington, and identifies where a need for future transit improvements are anticipated. A high priority route is proposed through the core of Downtown to meet future demands resulting from the high density mixed use development.

Exhibit 6-9. Covington Transit Corridor and Level of Service Map



Source: (City of Covington, 2019)

## Traffic Congestion

Street operations in urban areas are generally controlled by the operation at intersections. As established in the 2015-2035 Comprehensive Plan, transportation concurrency<sup>6</sup> in Covington is measured by PM peak hour operation of all signalized, roundabout-controlled, and all-way stop controlled intersections located within the city limits.

Six letter designations, “A” through “F,” are used to define level of service (LOS). LOS A and B represent conditions with the lowest amounts of delay, and LOS C and D represent intermediate traffic flow with some delay. LOS E indicates that traffic conditions are at or approaching congested conditions and LOS F indicates that traffic volumes are at a high level of congestion with unstable traffic flow.

Exhibit 6-10 below summarizes the LOS standards established by the City for City streets in the 2015-2035 Comprehensive Plan.

### Exhibit 6-10. Level of Service Standard for City Streets

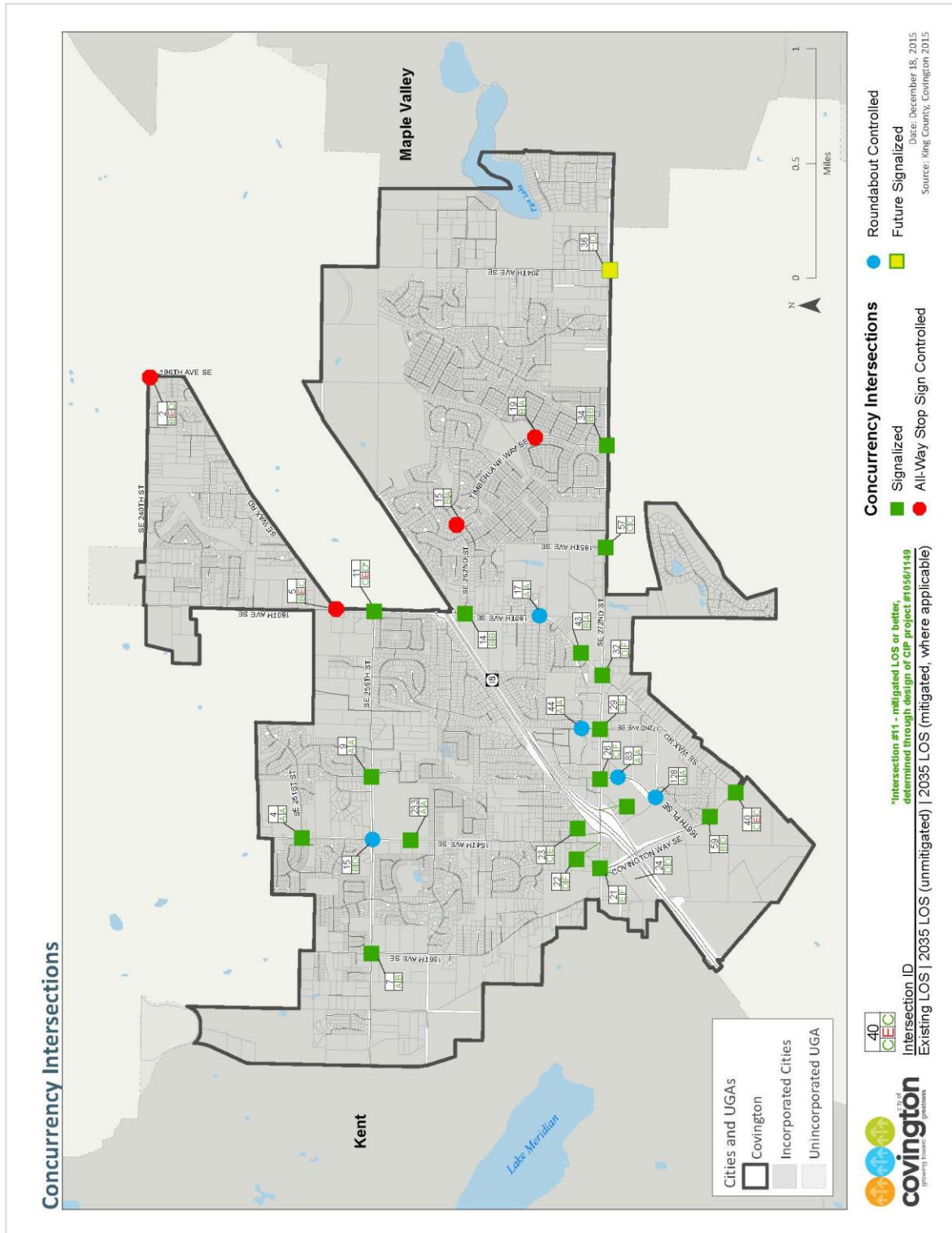
Street Intersection	Standard <sup>1</sup>
Signalized, roundabout-controlled and all-way stop controlled intersections of all Arterial and Collector streets, except SE 272nd Street (SR 516)	LOS D or better.
Signalized intersections along SE 272nd Street (SR 516)	LOS D or better, until an ultimate capacity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

1. Level of service for the weekday PM peak hour, based upon methods set forth in the current version of the Highway Capacity Manual, unless otherwise authorized by the Director of Public Works.  
Source: City of Covington, 2015-2035 Comprehensive Plan (adopted in 2016)

Concurrency intersections (see Exhibit 6-11) within Covington and their existing and projected 2035 levels of service are shown on the map below.

<sup>6</sup> Transportation concurrency means that improvements or strategies are in place at the time of development, or that a financial commitment is in place to complete the improvements or strategies within six years (RCW 36.70A.070).

Exhibit 6-11. Covington Concurrency Intersections



Source: (City of Covington, 2019)

As shown, all intersections currently meet the level of service standards for City streets and no existing deficiencies are identified, but four locations are projected to exceed level of service standards by 2035:

- SE 240th Street/196th Avenue SE (currently all-way-stop controlled).
- SE Wax Road/180th Avenue SE (currently all-way-stop controlled).
- SE 256th Street/180th Avenue SE (currently signal controlled). It is noted that this already reflects the improvement identified in the 2016 to 2021 TIP, but the projected average delay under 2035 buildout conditions exceeds the LOS D threshold by about 5 seconds.
- Covington Way/SE Wax Road (currently signal controlled).

There are also several intersections located along SE 272nd Street (SR 516) that are projected to operate at LOS E or LOS F in 2035; however, with the street improved to ultimate capacity, City standards allow traffic operation at these levels.

In order to meet the City's LOS standards as well as to provide operational improvements across modes, the City identified in the 2015-2035 Comprehensive Plan (adopted in 2016) projects in its 20-Year Transportation Improvement Program (TIP) as well as the 6-Year TIP for the 2016-2021 period (Exhibit 6-12). Each year the city updates its 6-Year TIP, on June 9, 2020 ([Res. 20-11](#)) the City Council adopted the current 6-Year TIP for 2021-2027. Further, to address the four future deficiencies projected in above, additional street improvements are needed. See the table below for six and 20-year transportation improvements. Projects in Downtown and in the 2021-2027 TIP are within the blue border (see Exhibit 6-12). 20-Year projects are shown in Exhibit 6-13.

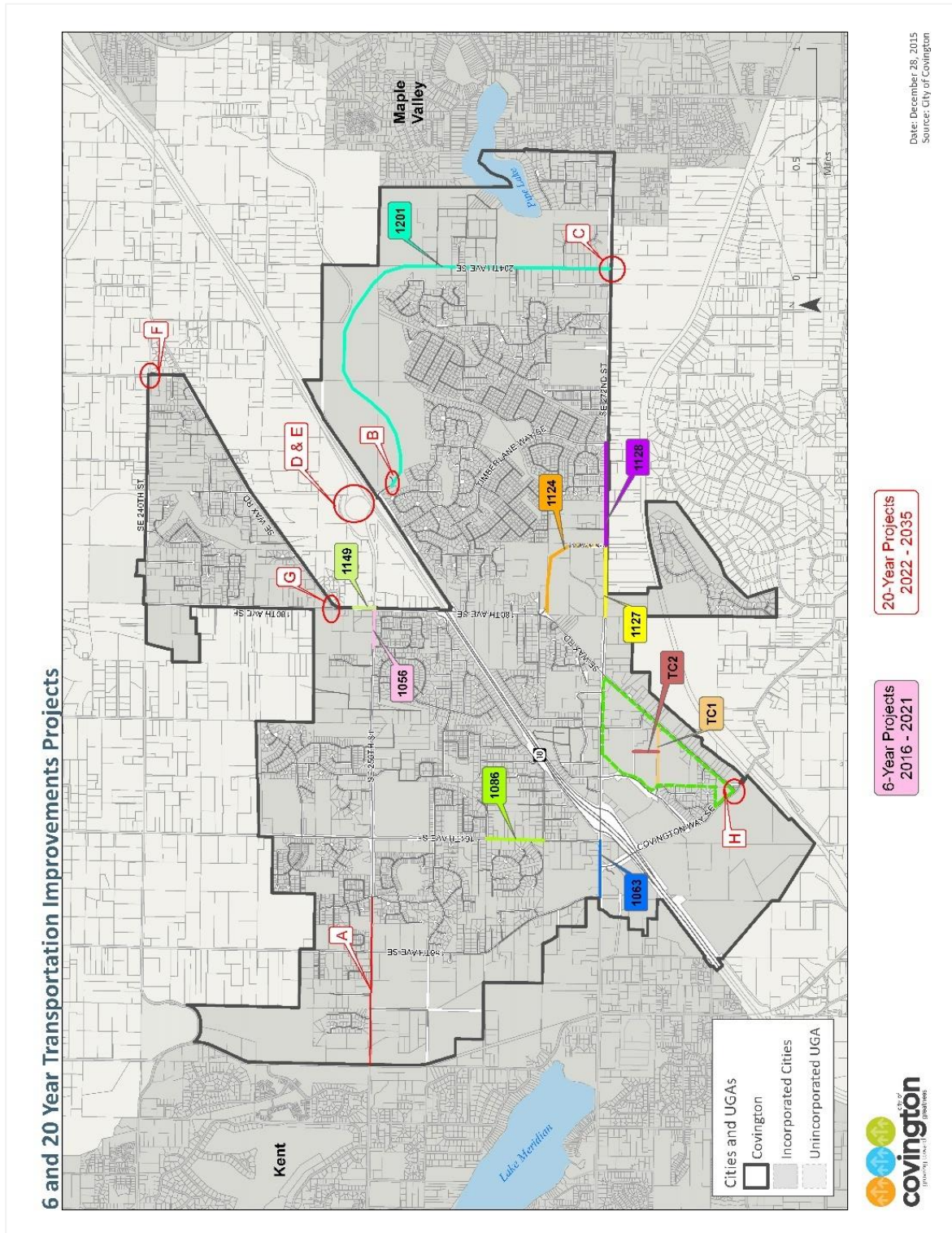
## Exhibit 6-12. Six and 20-Year Transportation Projects

Project	Description	CIP #/Source
SE 272nd Street (SR 516) and Jenkins Creek to 185th Place SE)	Widen to 5 lanes & reconstruct, sidewalks, and new stream crossing.	1127
204th Avenue SE and SE 272nd Street to SE 256th Street	Widen to full City Standard, sidewalks, bicycle lanes, planted medians.	1201
SE Wax Road and Covington Way	Wax Road/Covington Way Roundabout, Intersection modifications	1053
SE 272nd Street (SR 516) and 185th Place SE to 192nd Avenue SE	Widen to 5 lanes & reconstruct, sidewalks, new signal.	1128
SE 272nd Street (SR 516) and 160th Avenue SE to 164th Avenue SE	Signal modifications, add turn lanes, and stream crossing.	1063
SE 256th Street and 180th Avenue SE	Signal modifications, add right turn lane.	1056 and 1149
SE 276th Street and 168th Place SE to SE Wax Road	New route, new alignment, Type II Roadway.	Town Center 1
172nd Avenue SE and SE 275th Street to SE 276th Street	New route, new alignment, Type I Roadway.	Town Center 2
185th place SE Extension and Wax Road/180th Avenue SE Roundabout to SE 272nd Stet	New route, new alignment, access management.	1124
SE 256th Street, from 148th Avenue SE 160th Avenue SE	Create cross section that allows intersection improvements to function. Add 2 Through Lanes, LTL Median, and Bike Lanes.	A. DEA Rate Study 2010
191st Avenue SE	Local roadway connection and traffic calming, to be built as part of the Lakepointe Urban Village.	B. Hawk Property Planned Action
SE 272nd Street/204th Avenue SE	Signalize and extend planned three-lane section to this intersection, providing a southbound left-turn lane.	C. Hawk Property Planned Action
SE 256th Street/State Route 18 Westbound Ramps	Signal or Roundabout	D. Hawk Property Planned Action
SE 256th Street/State Route 18 Eastbound Ramps	Signal or Roundabout	E. Hawk Property Planned Action
SE 240th Street/196th Avenue SE	Add eastbound left-turn lane.	F. 2035 Concurrency
SE Wax Road/180th Avenue SE	Add northbound right-turn lane or signalize.	G. 2035 Concurrency
Covington Way/SE Wax Road	Add southbound left-turn lane.	H. 2035 Concurrency

Notes: Projects in Downtown and in the 2021-2027 TIP are within the blue border.

Sources: City of Covington Capital Improvement Program 2016-2021; DEA and Heffron Transportation, Inc. 2015; updated with Resolution 2020-11.

Exhibit 6-13. Comprehensive Plan 20-Year Street Improvement Projects



Source: (City of Covington, 2019)



With the improvements identified in Exhibit 6-12, the four intersections projected to operate below standards in 2035 would be able to meet concurrency standards as demonstrated in Exhibit 6-14 below.

**Exhibit 6-14. Street Improvement Projects to Meet Concurrency**

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

1. Determined through design of Capital Improvement Program (CIP) project # 1056/1149

Sources: DEA and Heffron Transportation, Inc. 2015

## Current Plans and Regulations

### Availability of Non-Motorized Facilities

The City of Covington has identified specific multi-modal segments that can be constructed to provide non-motorized connectivity around and within the Downtown core (generally the Town Center zone area). Multi-modal opportunities include mixed traffic facilities, visually separated facilities, and physically separated facilities. The 2014 Town Center Economic Impact and Infrastructure Cost Study identifies eleven town center streets that can be constructed or modified to accommodate pedestrian and bicycle circulation. Ten of the eleven streets are primarily mixed traffic facilities while SE Wax Road may be improved to provide a visually separated bike lanes and pedestrian ways. See Exhibit 6-15.

## Exhibit 6-15. Town Center Street Grid System Concept



Source: City of Covington, 2014

1. Town Center Main Street (Type I): New north-south road and pedestrian oriented corridor.
2. SE 276th Street (Type II): New east-west corridor.
3. SE 274th Street (Type I): New east-west corridor along an existing private access to be replaced with a public street.
4. 172nd Avenue SE (Type I): Improve the existing north-south corridor and extend the existing road to SE 276th (new grid street).
5. SE 277th Street (Type II): New east-west corridor.
6. SE 275th (Type II): New east-west corridor.
7. SE 273rd Street (Type I): New east-west corridor.
8. 172nd Place SE (Type I): New north-south corridor.
9. 170th Avenue SE (Type I): New north-south corridor.
10. 169th Avenue SE: New north-south corridor.
11. SE Wax Road (Type III): Proposed reconstruction.

In 2014, the cost for the 11 improvements was approximately \$74 million dollars. The 2014 study identified a number of funding and grant options.

The 2009 Nelson Nygaard Memo identifies two multi-use trail segments, Soos Creek and Jenkins Creek Trail, that will virtually complete a ring around the west, south and east of the Downtown core.

Based on discussions with the consultant team and city staff in April 2020, the most significant item discussed was the need for multi-use paths around the perimeter of the Downtown core and to facilitate pedestrian movements within the Downtown core. The trail segments that

were discussed are the same as identified in the Nelson\Nygaard Memo. The Soos Creek Trail extension is intended to connect Soos Creek Trail Park to 272<sup>nd</sup> Street along the east side of the creek. The second trail segment is the Jenkins Creek Trail connecting SE Covington Way (on the west side of the creek) north to Jenkins Creek Park (4,260 LF). The 2014 Town Center Economic and Infrastructure Cost Study provides an estimate for Jenkins Creek Trail at a total cost of \$6,726,720 (in 2014 unit prices). The 2014 study does not provide an estimate for the Soos Creek Trail.

The 2016 Park, Recreation, and Open Space (PROS) Plan provides extensive information on multi-use trails from community engagement, facility details, cost, and implementation strategies. There are many trails identified in the PROS plan; however, the two trail segments listed above were recently identified with high level of importance with city staff.

Due to Covid-19, the demand/sales for bicycles have increased significantly. Many news reports indicate that local commuters may elect to ride a bike to work versus using mass transit or carpool forms of transportation.<sup>7</sup>

## Wayfinding and Illumination

The PROS Plan identifies the need for pedestrian and bicycle wayfinding but is limited in detail. Further analysis and community outreach discussion is needed for existing and proposed trail segments to identify specific improvements and implementation.

## Promote ‘Park Once and Walk’ within Downtown

The Downtown is bisected north and south by 272<sup>nd</sup> street (aka SR 516). This appears to be the biggest hindrance of the existing pedestrian movements for a ‘park once and walk’ dynamic within the Downtown area. The April 2009 Memo provided by Nelson Nygaard provides a very detailed Strengths Weaknesses Opportunities Threats (SWOT) analysis for transportation circulation in the Downtown. The memo includes many *Opportunities* listed as potential solutions to promote better pedestrian circulation. Most of the ideas are intended to be implemented as new development occurs in the Downtown area; however, some can be implemented at any time under a capital improvement effort. The list below is a partial list of potential improvements provided in the memo that could be implemented.

- It may be feasible to add a “peel off ramp” to the northbound off-ramp from SR 18 that would provide an additional access to the south side of Downtown.

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<sup>7</sup> See the provided link below for more information. <https://www.kiro7.com/news/local/bike-sales-surge-during-pandemic/M3A73XDTHZFJDLWSMZHL35OTY/>

- Median planter strips added on 272nd may provide opportunities for mid-block crossings. An ideal location for a mid-block crossing appears to be west of the 172<sup>nd</sup> Ave SE intersection.
- Identify priority locations for non-motorized facilities on existing streets to help plan improvement of facilities.

## Key Findings and Planning Implications

Discussions with the consultant team and city staff in April 2020 indicated a need for multi-modal and specifically multi-use paths in and around the Downtown core (generally the Town Center zone area), including incorporating wayfinding and illumination standards within the Downtown boundaries for public trails, sidewalks etc. Multi-use paths are identified in multiple city documents from the Transportation and SWOT memo prepared by Nelson\Nygaard in 2009 supporting the current Downtown Plan to the Comprehensive Plan prepared in 2016 and most recently updated in 2019. Outside of the City's formal documents, the public is demonstrating a need for bicycle transportation facilities with increased bike sales in the Seattle metro area due to Covid-19.

The second important topic during the April 2020 meeting was the desire to create a 'park once and walk' environment within the Downtown area. The Comprehensive Plan and the Downtown Plan and Zoning Study both provide a strategic plan for implementing pedestrian friendly facilities in the Downtown core as new developments occur south of 272<sup>nd</sup> Avenue. To better connect the Downtown core north and south of 272<sup>nd</sup>, a mid-block crossing west of 172<sup>nd</sup> Ave SE could be evaluated and constructed.

# 7 UTILITIES

## Existing Plans and Documents Reviewed

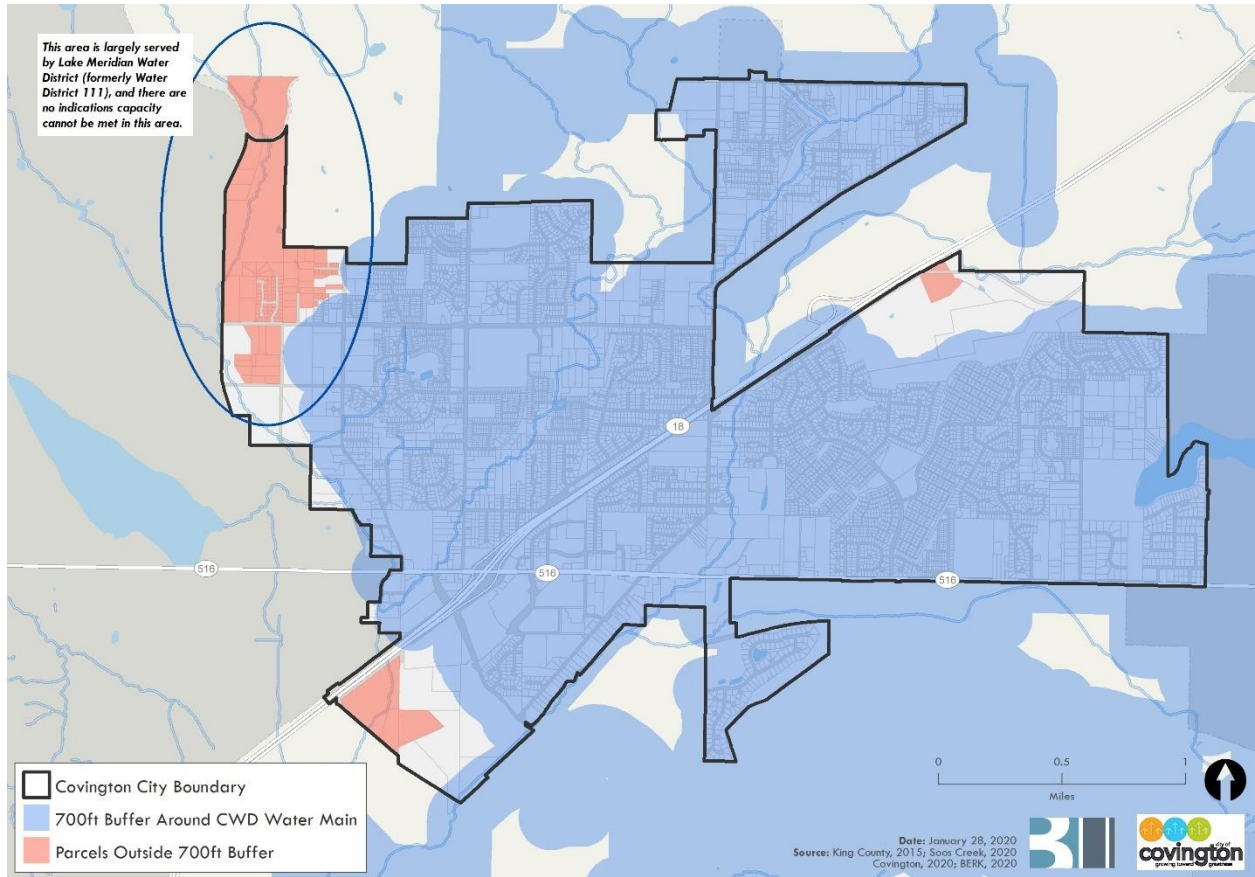
- City of Covington Comprehensive Plan 2015-2035, January 2016, updated through 2019, including CFP Appendix
- Covington Water District, Water System Plan, May 2016
- Soos Creek Water & Sewer District Sewer Comprehensive Plan, 2014
- BERK Consulting, Inc., Memo, January 30, 2020: 2019 Covington Urban Growth Capacity Analysis – Additional Information and Supplemental Maps

## Existing Features

### Water System

Water service in the City is provided primarily by the Covington Water District, a special purpose district and an independent, non-municipal service provider. All parcels in the Downtown are within 700 feet of a water line with the majority of the parcels located in the District's 660, 600 and 770 pressure zones; see Exhibit 7-1 and the District's website for a closer parcel by parcel view using the GIS viewer.

### Exhibit 7-1. Water Line Accessibility



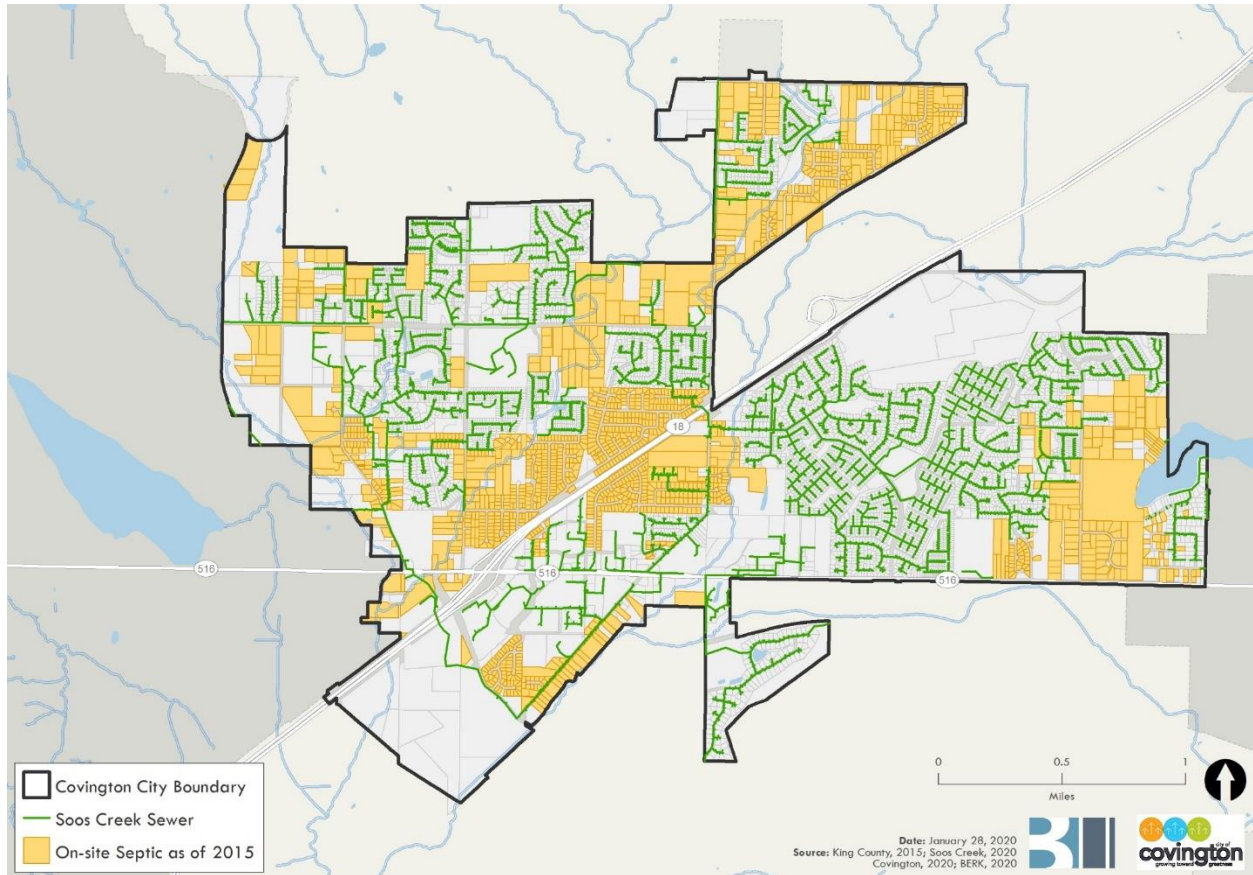
Source: (BERK Consulting, Inc., 2020)

## Sewer System

The sewer water system is operated and maintained by the Soos Creek Water and Sewer District (SCWSD). SCWSD transports the wastewater, via its sewer mains, to King County’s South Treatment plant in Renton for treatment and disposal.

Soos Creek Water and Sewer provided data on existing sewer lines in Covington in 2020. Additionally, a 2015 King County analysis was used to determine parcels still on septic. There are a number of parcels flagged as vacant or redevelopable that are still on septic systems including older platted lots in the northeast and southwest areas of Downtown and lands south of SE Wax Road; however, sewer lines have been extended on major roadways and hook up is possible. (BERK Consulting, Inc., 2020) See Exhibit 7-2.

Exhibit 7-2. Current Soos Creek Sewer Lines, and Parcels with On-site Septic as of 2015



Source: King County 2015; (BERK Consulting, Inc., 2020)

## Current Plans and Regulations

### Water Supply / Pressure

The Covington Water District provides water to the Downtown Study Area and has projected growth to the year 2035 considering growth management plans of Covington. Additional residential and non-residential growth is anticipated in water pressure zones serving Downtown. The District has the capacity to serve its designated service area in the City and UGA.

The district has a water supply strategy with four elements:

1. **Regional Supplies.** *The District currently uses the Regional Water Supply System (RWSS) as its primary source of supply and will continue to do so into the future. The RWSS is a filtered surface water and groundwater supply originating from the Green River. As a partner in the RWSS, the District obtains water through three connections.*

2. **Groundwater Supplies.** *The District has historically been served by quality groundwater supplies. It is the District's goal to continue using its existing groundwater wells into the future as its secondary source of supply, primarily for diurnal peak demands and during times where the RWSS supplies are limited.*

3. **Conservation.** *The District's current water conservation program includes goals and measures consistent with the Water Use Efficiency (WUE) Rule. The program plays an important role in the District's supply strategy through the reduction in growth of future water demand.*

4. **Water Resource Management.** *The District will continue its programs and plans that support its water resources. Programs and plans include source protection, water shortage response planning, and regional supply planning.*

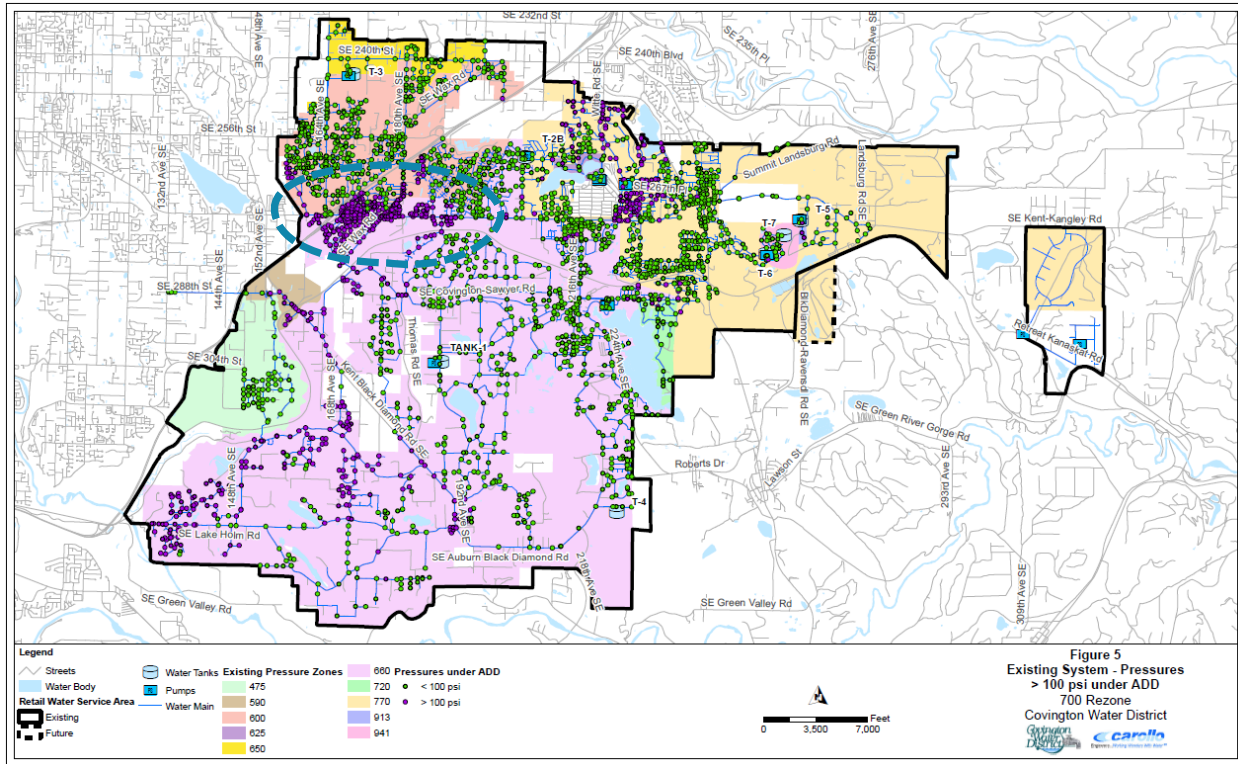
Water Supply and Conservation: Chapter 2 of the 2016 Water System Plan discusses the need for water conservation that began in the early 1990's and continues today. The District's latest effort for water conservation is found in the 2014-2019 Water Use Efficiency (WUE) Program, adopted by the District Board of Commissioners in January of 2014. According to the district, the program is consistent with the goals established by the District's board.

The District implemented and began monitoring the Wellhead Protection Program beginning in 1995. The program is part of the district, county, state, and federal guidelines for protect ground water. According to the district, they continually meet the requirements outlined in the Ground Water Rule.

To support water distribution and fire protection, the District plans for adequate fire pressure. The Covington Downtown area has the largest fire flow requirements in the system (5,000 gpm for 4 hours), which meet the needs of large commercial customers. The plan identifies current and long-term high pressure conditions with a system rezone and improvements planned to address proper service throughout the district, including Zone 700 that includes much of Downtown.



Exhibit 7-3. Covington Water District: Existing System Water Pressure

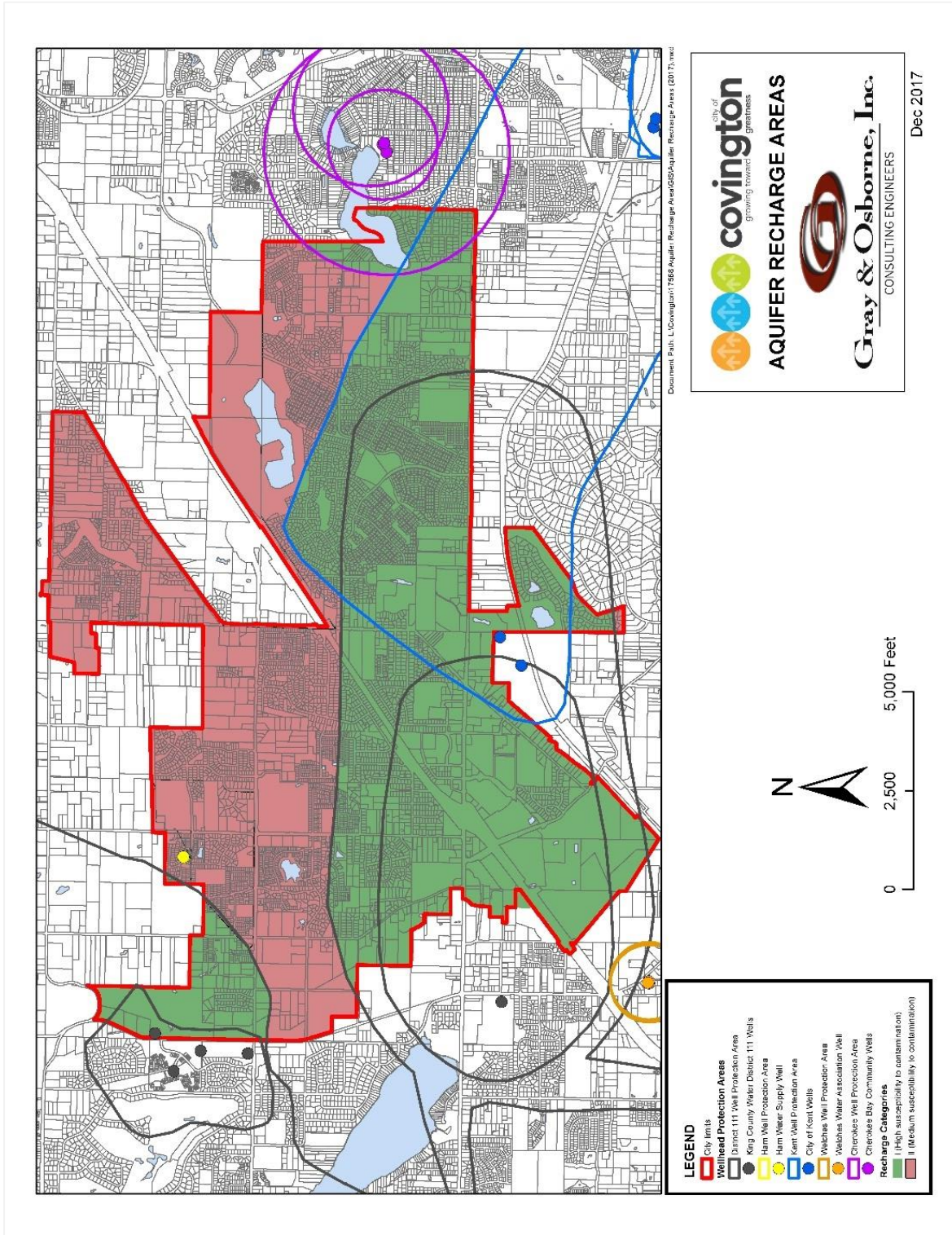


Source: (Carollo, Final December 2016)

### Groundwater Protection

Downtown is in a Recharge Category I (High susceptibility to contamination) area, and is in a Lake Meridian Water District Well Protection Area and a Kent Well Protection Area. See Exhibit 7-4. Any development would need to address the City’s stormwater management standards and decommission old wells prior to development. Certain land uses involving hazardous materials or above ground or underground tanks are restricted in aquifer protection areas to avoid groundwater contamination. See Covington Municipal Code Chapter 18.65, Critical Areas, Article IV.

Exhibit 7-4. Aquifer Recharge and Protection Areas



Source: Gray and Osborne, Inc. 2017; (City of Covington, 2019)

## Waste Water Systems

The Soos Creek Water and Sewer District provides sewer service to Covington.

The 2014 Soos Creek Water and Sewer District Sewer Comprehensive Plan identifies numerous capital projects, some of which are located within the City of Covington. All recommended projects belong to one of two categories, pipe replacements/upgrades or lift station replacement/upgrades.

The Soos Creek Water and Sewer District’s CIP for projects within the City of Covington is shown in Exhibit 7-5; the table has been updated since the 2015-2035 Comprehensive Plan Capital Facility Plan Appendix to reflect years completed. Some projects are located in city limits and others are improvements intended to serve the city. The projects are identified as capacity and non-capacity projects.

**Exhibit 7-5. Soos Creek Water and Sewer District Sewer Capital Improvement Program**

Project and Cost/Revenue	Capacity	Short Term 2012-2022	Long Term 2012-2032	Completed (Year)
<b>CAPACITY AND NON-CAPACITY PROJECTS</b>				
<b>(Projects Required to Meet LOS and Other Projects Needed for Maintenance and Operations)</b>				
Q9-1: Lift Station 46 Force Main	X	\$2,006,000		2018
Q9-2: Lift Station 46 Gravity Sewer – North (Lift Station 21 Diversion)	X	\$805,000		2018
S10-3: Lift Station 46 Gravity Sewer – South (Lift Station 28B Interceptor)	X	\$9,550,000		2018
P12-8: Lift Station 11B Force Main Bottleneck Upgrade	X	\$1,657,000		
M12-15: Lift Station 43 Interceptor	X		\$4,284,000	
N11-16: Little Soos Creek Main Upgrade	X		\$2,027,000	
Q9-20: Lift Station 45 Interceptor	X		\$2,350,000	
P10-21: Lift Station 14 Interceptor	X		\$1,190,000	
Q9-1A: Lift Station 46	X	\$6,000,000		2018
R12-2: Lift Station 24B Abandonment	X	\$913,000		
GF-1: Maintenance Facility	X	\$1,300,000		2018
GF-2: SCADA Upgrade		\$375,000		2018
<b>Total Capital Projects</b>		<b>\$22,606,000</b>	<b>\$9,851,000</b>	

Source: Soos Creek, 2014 and 2020; SvR, 2015; (City of Covington, 2019)

Projects listed are located within the City of Covington or serve the city as identified in the 2014 Soos Creek Water and Sewer District Sewer Comprehensive Plan. Some projects are for the benefit of other jurisdictions.

## Key Findings and Planning Implications

- Sewer improvements have been made in Downtown Covington, but many parcels remain on septic service in the short-term.
- The Covington Water District has developed sufficient plans regarding water supply, implementation, protection, and fees for operations and maintenance.
- City regulations address wellhead protection for Lake Meridian Water District and the City of Kent. Land uses with hazardous materials are limited in the Downtown area due to its high susceptibility for contamination of groundwater sources.

# 8 PUBLIC SERVICES

## Existing Features

This section describes police, fire protection, schools, and parks in or near Downtown.

### Police

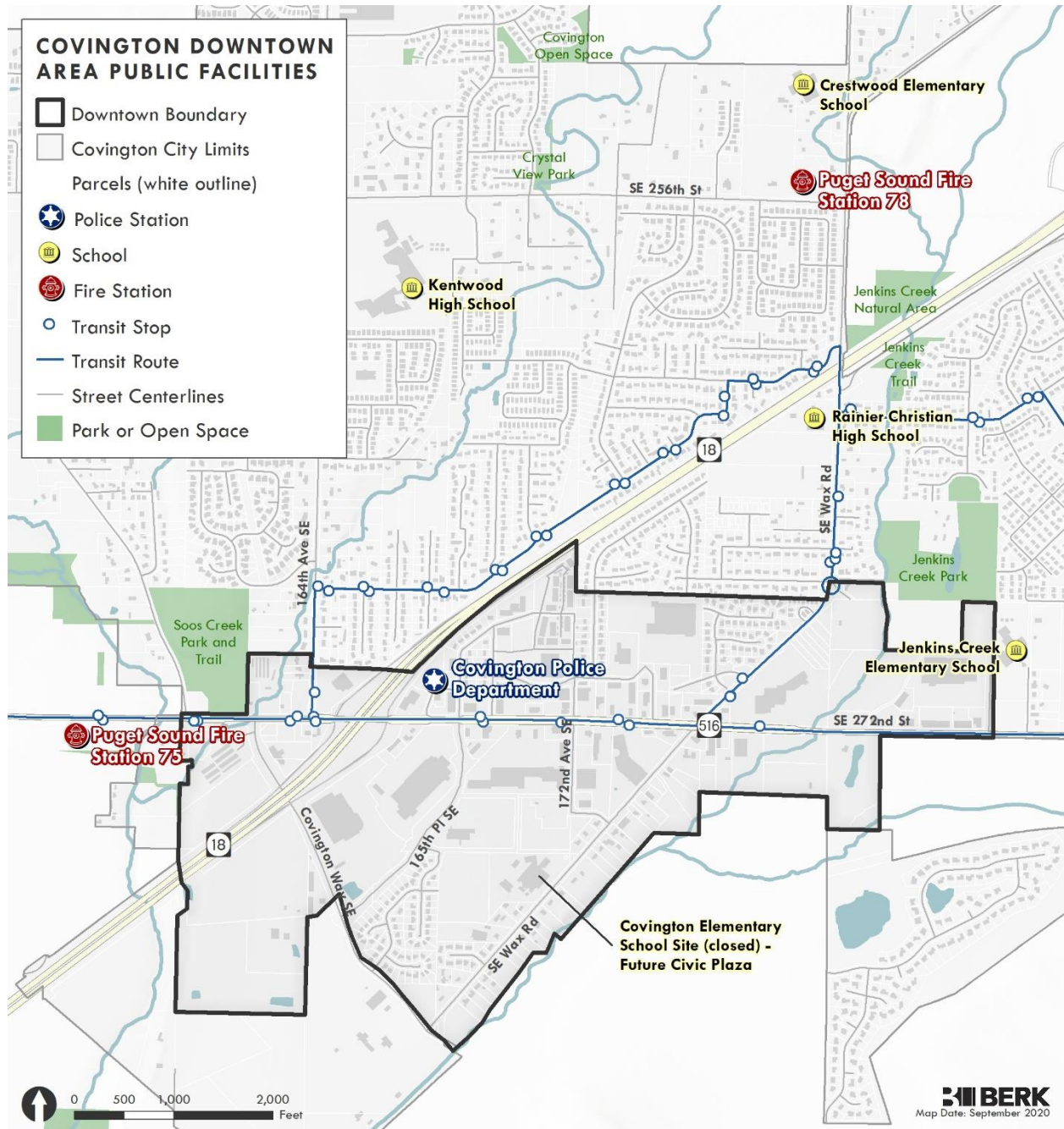
#### Staff and Facilities

Police service are provided by the Covington Police Department headquartered at Covington City Hall though there is no public entrance. All Covington police officers are King County Sheriff's Office employees who are dedicated to Covington via contract. As of September 2019, the Covington Police Department consists of 11 patrol officers, one traffic officer, one school resource officer, one detective, one sergeant, and a police chief. The total amount of commissioned officers serving the City are 19.37 including portions of FTE's from specialty units that support Covington (like Major Crimes Unit, Special Assault, SWAT, etc.).

The Police Department maintains three shifts for 24/7-patrol coverage, and 2 officers on patrol each shift. When calls for service in commercial areas occur, currently one or two officers on duty respond, leaving other neighborhoods without an immediate response depending on the nature of the call. Covington often only has one patrol officer working in the city between 2am and 10am and does not have adequate staffing to dedicate any officers to the retail areas where a majority of the calls for police service are generated.

In 2019 the City purchased almost 8 acres of the 16 acre closed Covington Elementary property (see named site on Exhibit 8-1) as a strategic piece of land desired by the city for the future Covington Downtown. As of February 2020, two of the existing buildings are currently going through the change of occupancy process in order to be used by Covington's police department as well as training for the King County Sheriff's department, until such time as the site is redeveloped. Remaining buildings would be demolished.

Exhibit 8-1. Public Facilities in Downtown Covington and Vicinity



Source: King County, City of Covington, BERK Consulting, Inc. 2020.

## Calls for Service

Downtown Covington with its concentration of commercial uses is a focal point for police calls for service. Larcenies such as shoplifting or theft of other possessions is the primary category. See Exhibit 8-2.

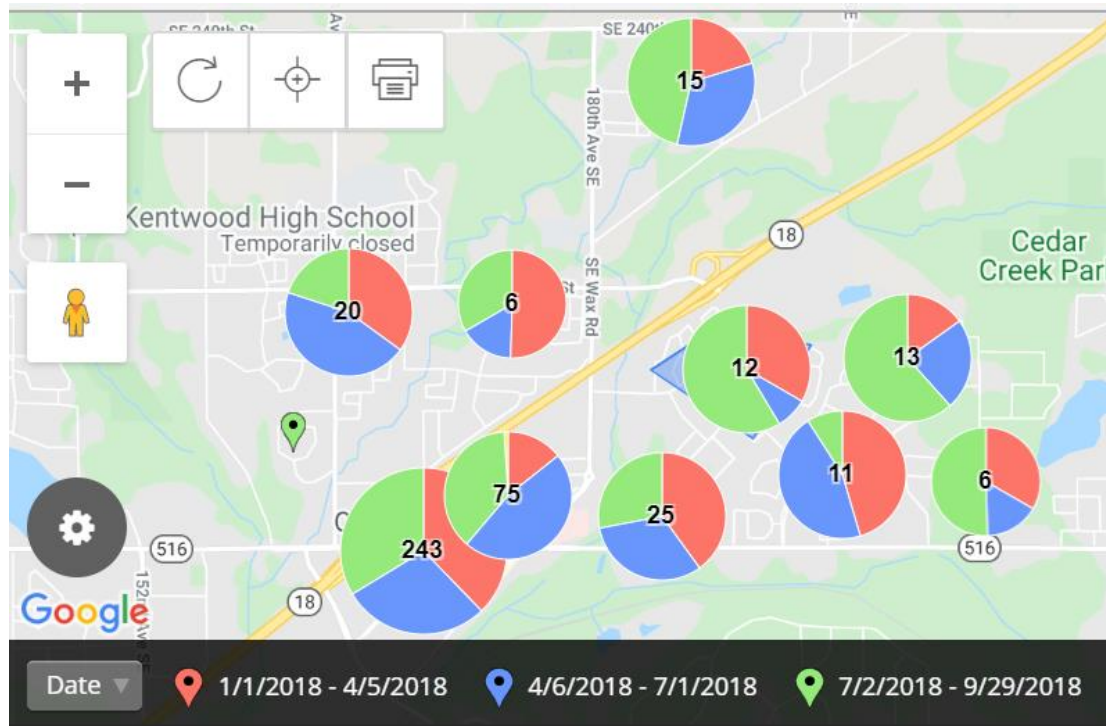
**Exhibit 8-2. Covington Selected Crime Offenses 2017-2018**

Selected Crime Offenses	2017	2018
Robbery	8	5
Burglary	30	33
Larceny	173	178
Vehicle Theft	56	13

Sources: (City of Covington, 2017) (Washington Association of Sheriffs and Police Chiefs, 2018)

Exhibit 8-3 maps crime from January 1 to September 30, 2018, and illustrates the concentration of larcenies in Downtown.

**Exhibit 8-3. Covington Larcenies January 1 to September 30, 2018**



Source: Police Chief Andy McCurdy, <https://www.batchgeo.com/>, 2019

## Fire/Emergency Medical Services

Covington's fire and emergency services provider is the Puget Sound Regional Fire Authority (PSRFA), which also services Kent, Maple Valley, SeaTac, and other areas of King County. Its services include fire prevention and suppression, emergency medical services, and technical rescue. There is one fire station located within Covington, Station 78 also known as Covington or East Hill Fire Station north of Downtown. However, Station 75 is located just outside the study area to the west. The Covington Station's primary programs are advanced auto extrication, site plans, and facilities.

The City of Covington administers a local Fire Prevention Bureau, which contracts some community development services with PSRFA.

A map of public facilities in Downtown Covington and vicinity can be seen in Exhibit 8-1.

## Schools

Educational services are provided by the Kent School District. The Office of the Superintendent of Public Instruction (OSPI) oversees public K-12 education in Washington State and sets policy for the District. A map of public facilities in Downtown Covington and vicinity can be seen in Exhibit 8-1. In 2019 the City purchased approximately 8 acres of the 16-acre closed Covington Elementary property (see named site on Exhibit 8-1). The public schools in operation within the vicinity of the Downtown are listed in Exhibit 8-4. Students served are addressed in total in Exhibit 8-5.

### Exhibit 8-4. Downtown Covington Area Schools Summary

School	Enrollment	Teachers
Covington Elementary	657	43
Jenkins Creek Elementary	435	33
Cedar Heights Middle	672	39
Mattson Middle	690	35
Kentlake High School	1,509	78
Kentwood High School	1,905	100

Source: (Washington Office of Superintendent of Public Instruction (OSPI), 2020)



Exhibit 8-5. Kent School District and Downtown Covington Area Schools Summary

2019-20	Kent School District	Downtown Covington Area Schools
Population	172,917	
Students	27,467	5,868
Teachers	1,607	328

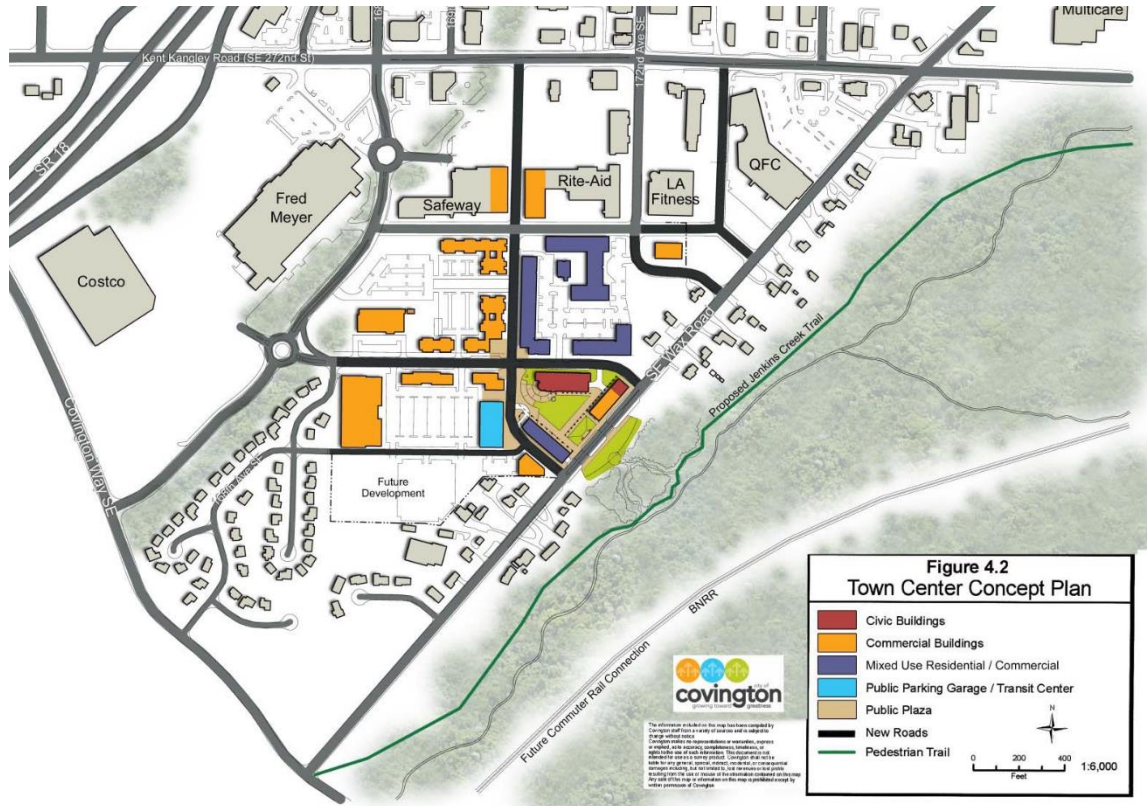
Sources: WA State Office of Superintendent of Public Instruction, 2020; WA Office of Financial Management, 2020; BERK Consulting, 2020.

Parks

Existing Parks

As illustrated on Exhibit 8-1, there are parks along the edges of Downtown but not within it though current plans call for a Town Center civic plaza and a South Covington Park. Eight of the 16 acre former Covington Elementary School site, was purchased in 2019 by the City of Covington from the Kent School District for the purposes of developing the site as a Civic Campus that incorporates a public plaza and gathering area in to the site design. See Exhibit 8-6. The Covington Police Department plans to occupy some buildings on an interim basis until new buildings are constructed.].

Exhibit 8-6. Town Center Schematic



Source: (City of Covington, 2019) (City of Covington, 2009)

To the southeast of the closed Covington Elementary School across Wax Road the city has purchased three parcels to develop in the future into South Covington (SoCo) Park.

Adjacent to the Downtown on the east is Jenkins Creek Park a 22-acre park with paved and natural surface walking trails, a picnic table, and natural areas, including a lawn, woodlands, Jenkins Creek and Spring Pond. A master plan calls for a restorative nature park and gathering space. See Exhibit 8-7.

## Exhibit 8-7. Jenkins Creek Master Plan Design



Source: City of Covington: <https://www.covingtonwa.gov/parks/JCP.php>.

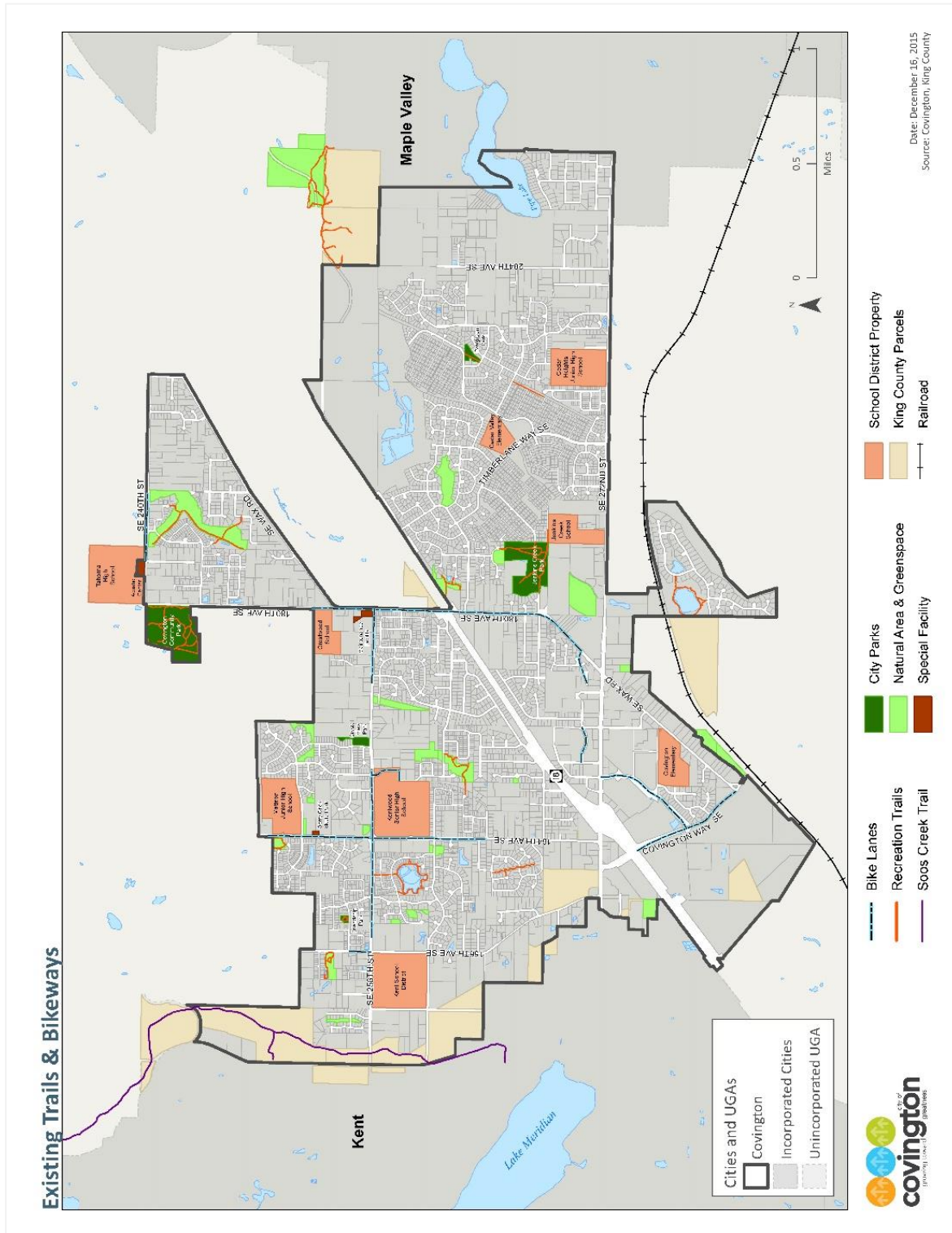
To the northwest lies Soos Creek Park and managed by King County and serving as a trailhead.

## Existing Trails

Currently there are no developed off-street public trails, though trail easements have been obtained from properties as they redevelop along Jenkins Creek and between those and existing publicly owned land (Covington, Kent, & the Covington Water District). As a result, along Jenkins Creek there is an ability to construct a nearly continuous trail from Covington Way north to SR 516. There are also bikeways in Downtown. See Exhibit 8-8.

There are informal pedestrian paths (social trails) that connect recent Downtown developments to shopping areas.

Exhibit 8-8. Current Trails and Bike Routes



Source: City of Covington Comprehensive Plan 2018

# Current Plans and Regulations

## Police

In the City's Comprehensive Plan Capital Facilities Element, the adopted level of service standard for the Covington Police Department is 0.75 officer per 1,000 population; the method includes the 16 officers excluding specialty unit staff.

The Washington State Office of Financial Management (OFM) estimates the 2019 population for the City of Covington as 20,280. Based on these figures, the effective level of police service is approximately 0.79 officers per 1,000 residents, which just exceeds the City's adopted standard; if counting only in-field officers (14), the rate is 0.69, less than the standard. To maintain current staffing standards, the Police Department will need to hire an additional seven officers by 2035 considering the City's planned growth.

The City's adopted LOS standard evaluates demand for police officers based solely on population; however, Covington Police Department call response data indicates that commercial development generates proportionately higher demand for police service than residential uses. As of 2017 (the base year for Covington Police Department's latest response summary data), Covington's resident population was 19,850, and its employment base was 4,977. In 2017, the Covington Police Department reported 806 commercially related offenses (occurring at or related to a business) and 872 non-commercially related offenses. While representing only 20% of combined population and employment, commercial uses generated almost half of the reported criminal offenses in 2017.

## Fire/Emergency Medical Services

Fire facility needs are a function of facility location and staffing, which feeds into a unit's response time in the case of an emergency. Level of service (LOS) is generally measured according to response time – response time is defined as the amount of time that elapses between the initial call for assistance and arrival of the first emergency unit. Response time is planned for through geographic distribution of stations, type of equipment based at each facility, and the staffing level at each facility. The City's adopted LOS and actual performance are shown in Exhibit 8-9.

### Exhibit 8-9. Fire and Emergency Level of Service Standard

Adopted Performance Standards Goals: Achieve 90% performance	Actual
First Unit Fire Arrival-Total Response time for Fires: 7 min 40 sec	75%
Minimum Effective Response Force (8) Fire Arrival-Total Response time for Fires: 9 min 50 sec	49%
Effective Response Force of (15-17) firefighters at Fires: 12 min 0 sec	52%
PSRFA will contain fires to the room of origin for 60% of structure fires	63%
First Unit Fire Arrival - EMS to critical emergency medical needs: 7 min 30 sec	85%
Second Unit Arrival - EMS to critical emergency medical needs: 7 min 50 sec	50%
Cardiac Survival Rate (Utstein Method of measurement); Maintain cardiac survival rates above national average of 32.64%	58%
Promote and Support public training in CPR to maintain administration of "Bystander" CPR 60% of the time or better	72%

Sources: Puget Sound Fire Annual Report, 2018; BERK Consulting, 2020.

## Schools

The City of Covington's Comprehensive Plan adopted by reference the most recently adopted Kent School District's level of service standards. The 2018/19 - 2023/24 District Capital Facilities Plan set student to teacher ratios and student generation rates as shown in Exhibit 8-10. The District's standard of service is related to class sizes per Exhibit 8-11. The implementation of the District's service standards is reflected in capital projects in Exhibit 8-12.

### Exhibit 8-10. Kent School District Student Generation Rates, 2019-20

Unit Type	Elementary	Middle School	Senior High	Total
Single Family	0.398	0.096	0.185	0.679
Multi-Family	0.117	0.028	0.029	0.174

Sources: (Kent School District, April 2018); BERK Consulting, 2020.

### Exhibit 8-11. Kent School District Class Size Standard of Service

Grade Levels	Maximum Class Size
K-3	23 students*
4-6	27 students
7-8	28.6 students
9-12	30.6 students

\* K-3 class sizes at schools that qualify for high-poverty funding are planned for a maximum of 17 students  
Source: (Kent School District, April 2018)

Exhibit 8-12. Planned Capital Projects

School	2016 Bond Projects	2018 Technology & Capital Levy
Covington Elementary	<ul style="list-style-type: none"> <li>Build a new Covington Elementary School.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
Jenkins Creek Elementary	<ul style="list-style-type: none"> <li>Safety upgrades to trash removal system</li> <li>New interactive, instructional media systems in each classroom</li> </ul>	<ul style="list-style-type: none"> <li>New fire alarm system</li> </ul>
Cedar Heights Middle	<ul style="list-style-type: none"> <li>Renovate outdoor athletic facilities</li> <li>Safety upgrades to trash removal system</li> <li>Convert classrooms to science labs</li> <li>New interactive, instructional media systems in each classroom</li> <li>Relocate art classroom</li> </ul>	<ul style="list-style-type: none"> <li>Replace outdated energy management system (EMS)</li> <li>Repair asphalt damage caused by tree roots</li> <li>Paint two portable exteriors</li> <li>Replace stage curtains</li> <li>New game lines in main/auxiliary gym and stage</li> <li>Replace carpet</li> <li>Replace two portable classroom wood construction ramps</li> </ul>
Mattson Middle	<ul style="list-style-type: none"> <li>New disability access ramps</li> <li>Renovate outdoor athletic facilities</li> <li>Safety upgrades to trash removal system</li> <li>New interactive, instructional media systems in each classroom</li> </ul>	<ul style="list-style-type: none"> <li>Replace outdated energy management system (EMS)</li> <li>Repave center of main bus loop and around three catch basins</li> <li>Paint four portable exteriors</li> <li>Replace carpet with Mondo Sport in the auxiliary gym</li> <li>Replace tile</li> <li>Paint interior walls</li> <li>Pressure wash/re-stain and varnish soffits</li> <li>Replace faculty exterior door and jamb</li> <li>Replace blinds throughout school</li> <li>New main breaker and feeders for electrical panel</li> <li>Replace gym curtain</li> <li>Replace two portable classroom wood construction ramps</li> </ul>
Kentlake High School	<ul style="list-style-type: none"> <li>Renovate athletic facilities</li> <li>Safety upgrades to trash removal system</li> <li>New interactive, instructional media systems in each classroom</li> </ul>	<ul style="list-style-type: none"> <li>Add the boiler to the energy management system (EMS).</li> <li>Replace outdated energy management system (EMS).</li> <li>Replace main building stair landings and stair treads</li> </ul>
Kentwood High School	<ul style="list-style-type: none"> <li>New disability access ramps</li> <li>New emergency lighting</li> <li>Renovate outdoor athletic facilities</li> <li>Safety upgrades to trash removal system</li> <li>New roof</li> <li>New interactive, instructional media systems in each classroom</li> <li>Remodel performing arts center</li> </ul>	<ul style="list-style-type: none"> <li>Replace 15-year-old garbage compactors</li> <li>Replace incandescent lighting with dimmable fluorescent lighting</li> <li>Replace HVAC equipment in main/auxiliary gyms and PAC</li> <li>Repair asphalt damage caused by tree roots</li> <li>Remove and repave PAC parking lot and south fire lane</li> <li>Remove and replace 300 feet of curb</li> <li>Replace restroom partitions:</li> <li>Paint eight portable exteriors</li> <li>Replace exterior auto shop door and jamb</li> <li>Replace carpet in main building classrooms</li> <li>Replace blinds throughout school (except annex)</li> <li>Replace single glazed windows with energy efficient units</li> <li>Replace outdated energy management system (EMS)</li> <li>Annex: Add boiler; add air return ductwork to weight room and gym</li> </ul>

Source: (Kent School District, 2019)

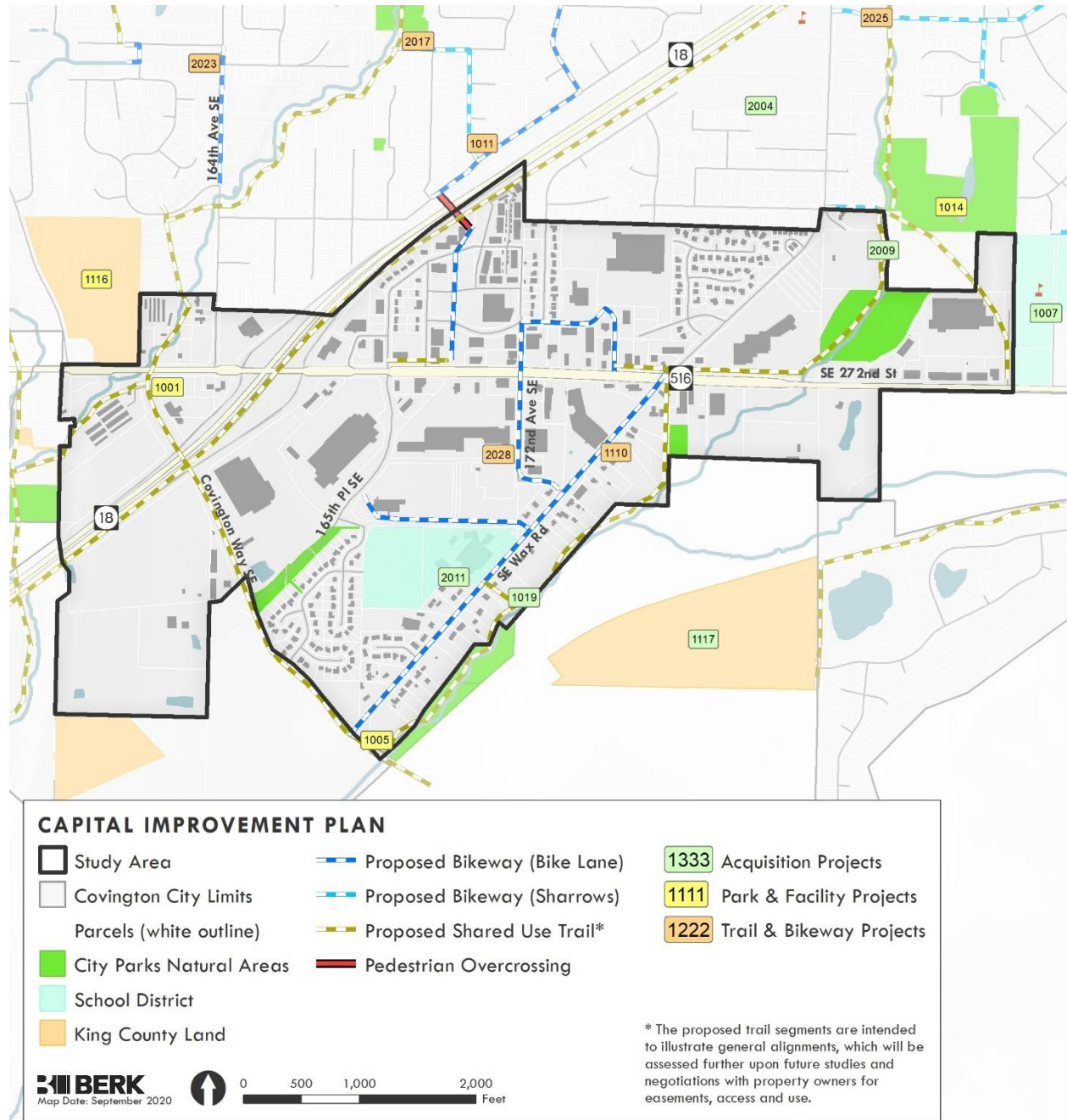
## Parks

The 2009 Downtown Plan includes a public plaza in Covington's Town Center Concept Plan for the Downtown that can be programmable for events and activities, while also providing trail connections. The 2016 Parks, Recreation, and Open Space Plan recognized the plaza concept and recommended the City seek funding for the acquisition and development of the Downtown plaza and the nearby trail connections along Jenkins Creek.

The planned capital projects identified the school acquisition and three parcels across Wax Road from the school have been purchased to develop South Covington (SoCo) Park as well as proposed shared use trails along SR 18, Covington Way SE, and Jenkins Creek. Additional bike ways are also proposed. See Exhibit 8-13.



Exhibit 8-13. Planned Parks and Trails



Source: City of Covington Comprehensive Plan 2018; King County GIS, 2020; BERK 2020.

## Key Findings and Planning Implications

- Downtown Covington with its concentration of commercial uses is a focal point for police calls for service. The City's adopted LOS standard evaluates demand for police officers based solely on population; however, Covington Police Department call response data indicates that commercial development generates proportionately higher demand for police service than residential uses.
- Two fire stations are located to the west and north of Downtown. Services are provided by the Puget Sound Regional Fire Authority (PSRFA).
- Educational services are provided by the Kent School District. There are no schools in operation in the study area with the recent City purchase a portion of the former Covington Elementary School site. Schools serving the study area appear to be meeting class size goals. District capital plans include modernization and improvement of schools serving the study area.
- There are no city parks in the study area though some abut the Downtown. The City purchased the Covington Elementary School for civic purposes though it has not been designed and programmed to date. Land has also been purchased between Wax Road and Jenkins Creek for the future SoCo Park. City plans call for developing trails and non-motorized connections in Downtown.

# 9 ACRONYMS AND REFERENCES

## Acronyms

CIP	Capital Improvement Program
CMC	Covington Municipal Code
FEMA	Federal Emergency Management Agency
GMA	Growth Management Act
gpm	Gallons per Minute
LF	Linear Feet
LOS	Level of Service
PSRC	Puget Sound Regional Council
RCW	Revised Code of Washington
SMP	Shoreline Master Program
SR	State Route

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# 10 APPENDICES

A	Market Study	10-2
B	Code Audit	10-3

# A Market Study



# B Code Audit