City of Covington 2015 Comprehensive Plan Update

1) Certification memo dated April 20, 2017 (see page 2). As of this Executive Board action, the City of Covington comprehensive plan is now fully certified for consistency with the transportation-related provisions of the Growth Management Act, VISION 2040, and Transportation 2040.

2) Certification report dated February 25, 2016 (see page 10). This report summarizes complete review of the 2015 comprehensive plan update and a certification condition for the city to address by December 2017.
CONSENT AGENDA

April 20, 2017

To: Executive Board

From: Councilmember Ryan Mello, Chair, Growth Management Policy Board
       Councilmember Rob Johnson, Chair, Transportation Policy Board

Subject: Approve Certification of Comprehensive Plans for the Cities of Covington, Gig Harbor, North Bend and Snoqualmie

IN BRIEF

The Growth Management Policy Board and Transportation Policy Board have reviewed resolutions adopted by the cities of Covington, Gig Harbor, North Bend, and Snoqualmie and find that they are consistent with the Executive Board’s direction on January 26 regarding an alternative path for full certification for certain cities.

In making the recommendations, the Growth Management Policy Board noted that while action may signify support of full certification, doing so does not indicate acceptance of all arguments included in each of the city’s resolutions. Rather, full certification acknowledges that each city has substantively responded to each of the issues identified by the Executive Board and has made a commitment to continue efforts to act individually and in collaboration with other cities and counties, to manage growth and its impacts consistent with VISION 2040.

RECOMMENDED ACTION

The Executive Board should certify that the transportation-related provisions of the Covington, Gig Harbor, North Bend, and Snoqualmie comprehensive plan updates, as clarified by commitments made in adopted resolutions to support VISION 2040 and work with regional partners, conform to the Growth Management Act and are consistent with the multicounty planning policies and the regional transportation plan.

DISCUSSION

The 2015 comprehensive plan updates for the cities of Covington, Gig Harbor, North Bend, and Snoqualmie were conditionally certified last year as part of PSRC’s plan review process. Conditional certification allowed the cities to qualify for PSRC managed federal funding (and two of the cities were awarded funds), while working to address questions about planning for growth significantly greater than adopted targets.
The issue of growth targets for Small Cities resulted in a number of challenging policy discussions. Board members reiterated that planning consistent with GMA and VISION 2040, and regional coordination are important and need to be clearly supported in all local plans. There was also recognition that amending plans now and addressing the underlying issues related to growth targets will require ongoing work and coordination at the local and regional levels. In January, the Executive Board approved the Growth Management Policy Board’s recommendation to provide a new path for the affected Small Cities to become fully certified.

This path does not require cities to amend their plans now, provided they adopt a council commitment, such as a council-adopted resolution, to continue to work collaboratively on growth issues that clearly require a longer term to fully address.

**Local Resolutions**

Following the Executive Board’s approval of the new path to certification, Covington, Gig Harbor, North Bend and Snoqualmie proceeded toward development and adoption of council resolutions. Bonney Lake and Carnation are continuing to move ahead with comprehensive plan amendments to address the conditional certification requirements. Each of the adopted resolutions are attached.

**Covington**

Covington adopted a resolution that notes how their comprehensive plan embodies policies consistent with the Growth Management Act and VISION 2040. While the city recognizes that growth anticipated by a 2014 market study exceeds the adopted targets, it states the importance of managing the growth and mitigating its impacts. The resolution commits the city to continue to work collaboratively with regional and countywide planning organizations on growth target allocations and planning for growth consistent with those target updates. Covington has implemented a number of best practices to manage growth, including growth monitoring, impact fees, transportation concurrency requirements, nonmotorized transportation and transit planning, adequacy of public facilities, environmental regulations, and design review. The resolution also notes the city’s planned 20-year growth is fully within the city’s current city limits and no expansion of the Urban Growth Area (UGA) is contemplated in the comprehensive plan.

Covington’s resolution states that it has addressed the issues identified in the conditional certification and requests full certification of its comprehensive plan.

Exhibits referenced in the Covington resolution have previously been provided to the boards and are available from PSRC.

**Gig Harbor**

The resolution adopted by Gig Harbor notes that a goal of the Gig Harbor comprehensive plan is to support the integration and implementation of VISION 2040 at the local level. The city notes that the plan and the city’s development regulations demonstrate a commitment to managing growth consistent with the Regional Growth Strategy and addressing growth-related impacts, including the appropriate use of development regulations, impact fees and other tools. To partially offset the difference between targeted and anticipated growth, the city has worked collaboratively with other Pierce County jurisdictions to adjust small city growth targets, which
were recommended to be adjusted by the Pierce County Regional Council on March 16, 2017. The city has hired planning consultants to update the city’s Transportation Element, impact fees, travel demand model, and Active Transportation Plan to help manage growth and its impact on transportation. The city notes the need to allow sufficient time to complete this work, rather than rush to meet the current conditional certification deadline.

In its adopted resolution, the city commits to advance the integrity and mission of VISION 2040 and the regional growth strategy through the policies and strategies of its comprehensive plan. The resolution directs city staff to continue to work collaboratively with other cities, Pierce County, the Pierce County Regional Council, and PSRC on growth targets and planning for growth, and seeks full certification.

**North Bend**

North Bend notes in its resolution its intent to remain a small town, and its plans and provisions to preserve open space and to protect farm land and the Mountains to Sound Greenway. It also notes how the targets differ from the city’s capacity for housing and employment that could be achieved at build-out. In its resolution, the city commits to continue to work collaboratively with local and regional stakeholders to manage growth consistent with the Growth Management Act, VISION 2040, and the regional growth strategy; to continue to work collaboratively on the next round of growth target allocations; and to manage growth within its city and UGA boundaries. The city requests full certification of its 2015 comprehensive plan.

North Bend also reiterated their interest in seeing PSRC’s plan review process provide comments to communities early in the process to provide greater clarity regarding requirements. This comment was included in the Taking Stock report and will be carefully considered as PSRC updates the plan review process prior to the next round of GMA updates.

**Snoqualmie**

The resolution adopted by Snoqualmie acknowledges anticipated growth and the importance of managing its impacts on surrounding communities, rural and resource lands, and the regional transportation system. The resolution identifies several strategies the city employs to manage growth, including land conservation, growth monitoring, development agreements, impact fees, and concurrency requirements. The city states that no expansion of the UGA is planned to accommodate growth and that the city will prioritize consistency with the regional growth strategy when considering future land use, zoning and infrastructure changes that significantly affect growth capacity. Snoqualmie’s resolution is lengthy and states the city’s position on PSRC’s authority and the city’s actions that it feels are consistent with GMA and VISION 2040, but the resolution appears to address each of the key points identified by the Executive Board.

Each of the resolutions is a statement of intent by each individual community to work collaboratively to manage future growth. Each resolution speaks to local perspectives and also addresses areas of shared interest, including managing growth and its impacts, working collaboratively on growth and target setting, planning for growth within the urban growth area, and considering the regional growth strategy in long-range planning decisions. These statements correspond to the points identified by the Executive Board, which were developed with a recommendation of the Growth Management Policy Board and with input from the affected cities and county. Certification of the cities’ plans acknowledges the contribution and commitment of cities to work on managing growth. It does not mean full agreement on the individual perspectives expressed in each resolution.
Please let staff know if you have any questions about the attached resolutions that could be addressed prior to the board meeting.

For more information, please contact Paul Inghram at (206) 464-7549 or pinghram@psrc.org or Michael Hubner at (206) 971-3289 or MHubner@psrc.org.

Attachments:
PSRC Exec Board Approved action item 10 - January 26, 2017
Covington Resolution 2017-04
Gig Harbor Resolution 1074
North Bend Resolution 1749
Snoqualmie Resolution 1380
Executive Board – January 26, 2017
Agenda Item #10

Under this option, the cities would be asked to:

- Acknowledge that the planned housing and employment growth anticipated in the small city’s adopted comprehensive plan is greater than adopted growth targets for the city, and acknowledge the importance of managing that growth and mitigating its impacts, including on surrounding communities, rural and resource lands, and the regional transportation system.

- Continue to work collaboratively with regional and countywide planning organizations on growth allocations during the next and future and target updates and commit to planning for growth in future plan updates consistent with those collaboratively-set and adopted-target updates.

- Identify and continue strategies cities are using to manage and mitigate the impacts of growth.

- Reinforce the city’s commitment to managing its growth within current city and UGA boundaries, while minimizing impacts on surrounding rural and resource lands; commit to using the adopted countywide criteria for evaluating any requested UGA modifications.

- Commit to prioritize consistency with the Regional Growth Strategy when considering future land use and zoning changes and capital facilities investments.
RESOLUTION NO. 2017-04

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COVINGTON, KING COUNTY, WASHINGTON, RELATED TO COMPREHENSIVE PLAN CERTIFICATION BY THE PUGET SOUND REGIONAL COUNCIL (PSRC); DOCUMENTING CERTAIN CITY POLICIES, ACTIONS, AND COMMITMENTS THAT SUPPORT LOCAL IMPLEMENTATION OF PSRC’S VISION 2040 AND THE REGIONAL GROWTH STRATEGY THEREIN; AND REQUESTING FULL CERTIFICATION OF THE COVINGTON COMPREHENSIVE PLAN 2015-2035 BY THE PSRC EXECUTIVE BOARD.

WHEREAS, the Washington State Growth Management Act (the “GMA”) requires the City of Covington (the “City” or “Covington”) to develop, adopt, and implement a comprehensive plan pursuant to Chapter 36.70A of the Revised Code of Washington (the “RCW”); and

WHEREAS, the GMA further requires that comprehensive plans be subject to continuing review and evaluation and requires that these plans be updated on a periodic basis to ensure continuing compliance with the GMA; and

WHEREAS, Covington initiated a major period update of its comprehensive plan in 2015 as required by Chapter 36.70A RCW; and

WHEREAS, on January 12, 2016, the Covington City Council (the “Council”) adopted the City’s major periodic comprehensive plan update, titled as the Covington Comprehensive Plan 2015-2035 (the “2015 Comprehensive Plan”), pursuant to Ordinance No. 02-2016; and

WHEREAS, the 2015 Comprehensive Plan was reviewed by state and regional agencies pursuant to applicable state and local laws and policies; and

WHEREAS, on February 25, 2016, the Puget Sound Regional Council (“PSRC”) issued a Plan Review Report and Certification Recommendation for the City’s 2015 Comprehensive Plan (the “PSRC Plan Review Report”) (Exhibit 1 hereto); and

WHEREAS, on April 28, 2016, PSRC’s Executive Board unanimously voted to conditionally certify the City’s 2015 Comprehensive Plan and, in a transmittal letter dated May 10, 2016 (Exhibit 2 hereto), indicated that the conditional status would remain until the City addresses the inconsistency between the anticipated growth included in the 2015 Comprehensive Plan and the housing and employment growth targets adopted by King County (as further described in pages 6 and 7 of the PSRC Plan Review Report); and
WHEREAS, on May 24, 2016, the Council adopted Resolution No. 2016-19, committing to address the conditions of certification pursuant to the PSRC Executive Board’s decision on April 28, 2016, and the PSRC Plan Review Report (Exhibit 3, hereto); and

WHEREAS, throughout the remainder of 2016, City staff and elected officials met and coordinated with King County, PSRC, and other cities within King County to address and resolve the City’s conditional certification conditions in the PSRC Plan Review Report; and

WHEREAS, at their January 26, 2017 board meeting, the PSRC Executive Board approved a new path for full certification for the six small cities, including Covington, that were conditionally certified related to growth targets (Exhibit 4, hereto); and

WHEREAS, Covington desires to utilize this new path for full certification and adopts the findings included herein to address the issues noted upon conditional certification;

NOW THEREFORE, BE IT RESOLVED by the City Council of the City of Covington, King County, Washington, as follows:

Section 1. Recitals Incorporated. The “Whereas” provisions above and associated attachments shall constitute findings of fact and are incorporated by reference as if fully set forth herein.

Section 2. Growth Targets.
   a. The City’s 2015 Comprehensive Plan embodies policies to ensure that growth will be consistent with the goals of the GMA and PSRC’s VISION 2040 (“VISION 2040”). The projected housing and employment growth (or jobs) numbers incorporated within the 2015 Comprehensive Plan were based upon a market demand study conducted by the City in 2014. The Council acknowledges that the planned housing and employment growth anticipated in the City’s 2015 Comprehensive Plan is greater than adopted growth targets for the City. The Council further acknowledges the importance of managing such growth and mitigating its impacts, including on surrounding communities, rural and resource lands, and the regional transportation system.

   b. The Council pledges its commitment to continue to work collaboratively with regional and countywide planning organizations on growth allocations during the next and future target updates and commits to planning for growth in future comprehensive plan updates consistent with those target updates that are collaboratively-set between the parties and adopted by regional and countywide planning organizations.

Section 3. Growth Impact Mitigation. Covington has and continues to plan and implement best practices in growth management to meet our community’s needs and to be a good partner to surrounding jurisdictions and the region. Such best practices in mitigating growth impacts include, but are not limited to: growth monitoring, collaborative planning, impact fees, setting and adhering to transportation concurrency requirements, non-motorized
transportation planning, ensuring adequacy of public facilities, enforcement of environmental regulations, and design review. The Council commits to continue the City’s proactive identification and adoption of strategies, measures, and actions to manage and mitigate the impacts of growth.

Section 4. Growth within UGA. The City’s new growth and development for the 20-year planning horizon, as identified in the 2015 Comprehensive Plan, is wholly within the existing city limits. The projected growth in the City’s 2015 Comprehensive Plan can be accommodated within the City’s existing boundary and no expansion of the urban growth area (“UGA”) is contemplated in the 2015 Comprehensive Plan. The Council pledges its commitment to continue to manage the City’s growth within current city and UGA boundaries, while minimizing impacts on surrounding rural and resource lands. The Council further commits to using the adopted countywide criteria for evaluating any requested UGA modifications.

Section 5. Regional Growth Strategy Consistency. The Council pledges its commitment to continue to support, integrate, and implement VISION 2040, and included Regional Growth Strategy, at the local level and to prioritize consistency with the Regional Growth Strategy when considering future land use and zoning changes and capital facilities investments.

BE IT FURTHER RESOLVED, that the Covington City Council finds that it has reasonably addressed the identified issues for receiving full certification pursuant to the new path for full certification approved by the PSRC Executive Board on January 26, 2017. Accordingly, the Covington City Council hereby requests that the PSRC Executive Board grant full certification of the City’s 2015 Comprehensive Plan.

ADOPTED in open and regular session on this 28th day of March, 2017, and signed in authentication thereof.

Jeff Wagner, Mayor

Sharon Scott, City Clerk

Kathy Hardy, City Attorney
BACKGROUND

A major emphasis of the Washington State Growth Management Act (GMA) is the need to coordinate local, regional, and state planning efforts. To advance this coordination, the Puget Sound Regional Council (PSRC) is required to formally certify that regional transit plans, countywide planning policies, and local comprehensive plans within the central Puget Sound region conform to: (1) established regional guidelines and principles, (2) the adopted long-range regional transportation plan, and (3) transportation planning requirements in the Growth Management Act. Within the central Puget Sound region, the multicounty planning policies (MPPs) have been established as the regional guidelines and principles under Revised Code of Washington (RCW) 47.80.026. Certification of local plans and policies is also a requirement for jurisdictions and agencies that intend to apply for PSRC funding or proceed with any project submitted into the Regional Transportation Improvement Program, regardless of funding source.

Within the central Puget Sound region, local governments and PSRC have worked together to develop an overall process (Adopted Policy and Plan Review Process, Revised September 2003) for reviewing and certifying local, countywide, regional, and transit agency policies and plans. This process also provides an opportunity to coordinate and share information related to local and regional planning. A set of materials, compiled in a Plan Review Manual, provides details on the review and certification process, background, and framework. The manual also provides guidance and checklists for aligning plans and policies with VISION 2040, Transportation 2040, and Growth Management Act requirements.

DISCUSSION

This report summarizes the findings and recommendations regarding the periodic update to the comprehensive plan for the City of Covington, adopted by the city on January 12, 2016. PSRC last certified the Covington comprehensive plan in 2012. PSRC staff reviewed the 2015 comprehensive plan and coordinated with city staff in the development of this report.

CERTIFICATION RECOMMENDATION

Based on the review of the City of Covington comprehensive plan, the following action is recommended to the PSRC Growth Management Policy Board, Transportation Policy Board, and Executive Board:

The Puget Sound Regional Council conditionally certifies that the transportation-related provisions in the City of Covington 2015 comprehensive plan conform to the Growth Management Act and are consistent with multicounty planning policies and the regional transportation plan.

1 The certification requirement in the Growth Management Act is described in RCW 47.80. The specific requirements for transportation elements in local comprehensive plans are spelled out in RCW 36.70A.070. PSRC’s Interlocal Agreement, Section VII, also provides direction for the review of local comprehensive plans and countywide policies (Resolution A-91-01, amended March 1998). The Council’s Executive Board last updated its process for Policy and Plan Review in September 2003. The process is also described in VISION 2040, Part IV: Implementation.
Conditional status is in place until the city addresses the inconsistency between the anticipated growth included in the plan and the housing and employment growth targets adopted by King County. This will include the following:

- Amend the plan to more fully recognize the objective of aligning with the Regional Growth Strategy, including the role of designated Small Cities and the objective to limit growth in those cities.

- Adjust the plan’s anticipated housing and employment growth to more closely align with adopted countywide targets. It is recognized that the city’s ability to reduce planned growth levels may be limited by unavoidable factors, such as actual growth since the target base year and development in the pipeline.

- Identify and prioritize strategies the city will take to manage growth and work toward better alignment with the Regional Growth Strategy and address more fully the impacts of planned growth on regional and local infrastructure and services and on the environment.

Coordination with the county, state, other cities, and other agencies should also occur to more fully address the potential regional impacts of planned growth that exceeds agreed-upon targets.

The city acknowledges this certification and commits to addressing the conditions according to the following schedule:

1. Council adoption of a plan of work that addresses the condition identified in the certification report by May 31, 2016.

2. Submission of a draft amended comprehensive plan and supporting documents that address the condition to PSRC for review and comment in advance of adoption.

3. Once the condition is adequately addressed, submission of the adopted amended comprehensive plan and supporting documents by December 31, 2017, for review and certification by PSRC.

It is recognized that the city’s comprehensive plan is highly supportive of the goals and policies of VISION and that the city has already taken a number of steps to work towards implementing VISION 2040. It is also recognized that much of the development that the city anticipates occurring during this planning period was initiated through city actions in response to market interest prior to the adoption of the plan. The city has taken a number of positive steps to focus growth within compact mixed-use central areas, to promote and protect environmental sustainability, and to invest in infrastructure that improves the quality of life of its residents.

The remainder of this report contains a summary of the PSRC review of the City of Covington comprehensive plan update. Under each heading, the scope of the certification review, as guided by the Plan Review Manual and Local Comprehensive Plan Checklist, is listed in high level bullets. Discussion in each topic area highlights exemplary provisions of the plan, as well as issues identified through the certification review where future work is needed to more fully address VISION 2040, Transportation 2040, or GMA planning requirements.
Part I: Conformity with Growth Management Act Transportation Planning Requirements

**SCOPE OF REVIEW**

The Growth Management Act (RCW 36.70A.070(6)) includes several requirements related to transportation elements in local comprehensive plans. These requirements are summarized as follows:

- **Land use assumptions and forecasts of travel demand** that are internally consistent and consistent with growth targets.
- **Service and facility needs**, including inventories of existing facilities, and level-of-service standards and concurrency provisions that address multiple modes of travel, planned land uses and densities, and state highways.
- **Financing and investments**, including a multiyear financing plan and reassessment strategy to address potential funding shortfalls.
- **Intergovernmental coordination** with neighboring cities, counties, and regional and state agencies.
- **Demand management**, including programs to implement the Commute Trip Reduction Act.
- **Pedestrian and bicycle planning**, including project funding and capital investments, education, and safety.
- **Land uses adjacent to airports**, identifying relevant facilities, existing and planned uses, and policies that discourage incompatible uses.

Air quality is largely an interjurisdictional issue in which each jurisdiction's travel behaviors, measured through vehicle emissions, affect the regional airshed. The Washington Administrative Code (WAC) requires local transportation elements and plans to include “policies and provisions that promote the reduction of criteria pollutants” for mobile sources (WAC 173-420-080). When PSRC reviews plans, it also certifies that the comprehensive plans include air quality policies and provisions, including a commitment to meeting the requirements of applicable federal and state air quality legislation.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**

The city’s comprehensive plan effectively addresses many of the transportation planning requirements of the Growth Management Act and includes adequate air quality policies and provisions. Highlights include:

- The transportation element includes clear mapping of existing inventories and future transportation investments prioritized based on a layered network approach. Policies TR-17 to 22 promote non-motorized transportation options in key locations and corridors in the city as integral elements of the city’s transportation system.
- The plan sets clear multimodal level-of-service standards for auto, transit, bicycle, and pedestrian modes of transportation. Future facilities needs are identified to meet demand and prioritized as medium to high based on clear criteria.
- The plan encourages land uses and densities that support increased transit use and explicitly supports transit oriented development in Policy T-28.
- Policies T-31 to 33 further, at a high level, the important role of interjurisdictional coordination in managing and planning the transportation system, including coordination with neighboring jurisdictions, regional agencies to secure grant funding, develop facilities of joint benefit, address joint-impact fees, and provide service to newly annexed areas.

**DISCUSSION: CONDITIONS FOR CERTIFICATION**

The certification conditions are discussed in detail under the Development Patterns section regarding consistency between the growth expectation of the comprehensive plan, growth targets, and the Regional Growth Strategy. The estimate of demand for new infrastructure and transportation projects should be reviewed and revised as
necessary to ensure the plan maintains internal consistency given any reassessment of planned growth. Where higher levels of growth are unavoidable, the city should emphasize and prioritize transportation actions that help to mitigate the impacts of that growth, including supporting walkable environments and improving transit.

**DISCUSSION: AREAS FOR FURTHER WORK**

The city should address the following comment at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans:

- □ Policy T-19 calls for the city to “develop a Non-Motorized Plan when funding becomes available that provides guidance on street design guidelines, trail standards, and bicycle and pedestrian priority routes.” Building on the sound planning for nonmotorized transportation in the comprehensive plan, this is an important step in implementation and could help to mitigate increases in traffic associated with growth. This would be appropriate work to prioritize for early completion.

**Part II: Consistency with Regional Plans and Policies**

**OVERVIEW**

This section discusses consistency with the adopted multicounty planning policies (established regional guidelines and principles under RCW 47.80.026) adopted in VISION 2040, and Transportation 2040, the region’s long-range transportation plan. In addition to the Multicounty Planning Policies, VISION 2040 contains a Regional Growth Strategy with a preferred distribution of the region’s residential and employment growth, as well as a number of implementation actions for local governments to carry out. Each policy area addressed in VISION 2040 is discussed in turn below.

**VISION 2040 CONTEXT STATEMENT**

VISION 2040 calls for local plans to include a context statement that describes how the comprehensive plan addresses regional policies and provisions adopted in VISION 2040. The plan includes a Regional Planning Statement that describes how the plan addresses regional policies and provisions adopted in VISION 2040. The city should review and revise the Regional Planning Statement, as needed, to address conditions described in detail in the Development Patterns section of this report.

**Environment**

**SCOPE OF REVIEW**

VISION 2040 calls for local comprehensive plans to address the following environmental policy topics:

- **Stewardship**, including addressing the natural environment throughout the plan, decisions based on best-available science, and regional environmental initiatives.
- **Earth and habitat**, including open space protection, restoration and protection of native vegetation, and coordination with adjacent jurisdictions.
- **Water quality**, including actions that maintain hydrologic functions and reduce water pollution in ecosystems, watersheds, shorelines, and estuaries.
- **Air quality and climate change**, addressing federal and state laws, reduction of pollutants, Puget Sound Clean Air Agency policies, and reduction of greenhouse gas emissions and adaptation to climate change.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**

The city’s comprehensive plan effectively addresses the environmental policy topics in VISION 2040 with strong goals and actionable policies. Highlights include:
The plan includes an optional natural environment element, which includes strong policies that promote a wide range of policies and actions that enhance environmental sustainability in the areas of water quality, hydrologic function, wildlife habitat, and air quality.

- Policies NE-6 to 9 advance a comprehensive approach to promoting urban forests and tree cover, including through tree retention, native plantings, and requirements for public and private lands.
- Policies NE-15 to 22 notably promote low-impact development and best practices in stormwater management.
- Policies NE-11 and 12, along with CF-42 and 43, address public and private energy efficiency as a means to reduce greenhouse gas emissions. Land use policies that promote compact mixed-use development and transportation strategies to promote alternative to travel by single-occupancy vehicle also contribute to mitigating the impact of the plan on climate change.

**DISCUSSION:** **AREAS FOR FURTHER WORK**

The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on environment.

### Development Patterns – Including the Regional Growth Strategy

<table>
<thead>
<tr>
<th>SCOPE OF REVIEW</th>
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<tbody>
<tr>
<td><strong>VISION 2040</strong> calls for local comprehensive plans to address the following development patterns policy topics:</td>
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<tr>
<td><strong>Urban areas</strong>, including targets for housing and employment growth, compact communities that support transit and walking, and provisions for redevelopment of underused land.</td>
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<td><strong>Centers</strong>, including planning for one or more central places as locations for compact, mixed-use development, with policies that prioritize funding to centers to advance development.</td>
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<tr>
<td><strong>Unincorporated urban areas</strong>, including policies that advance annexation and orderly transition of governance.</td>
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<td><strong>Resource lands</strong>, including identification of steps to limit development.</td>
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<td><strong>Regional design</strong>, addressing local provisions that apply the Transportation 2040 Physical Design Guidelines, energy efficient building, historic preservation, and enhanced sense of community.</td>
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<tr>
<td><strong>Health and active living</strong>, addressing healthy environment, physical activity and well-being, and safety.</td>
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**DISCUSSION:** **EXEMPLARY PLAN PROVISIONS**

The city’s comprehensive plan effectively addresses the development patterns policies in VISION 2040. Highlights include:

- The plan evidences strong support for compact development within identified central places. Goals III, IV, and V set high level priorities for focusing growth within downtown Covington and the Lakepointe master planned development. Policies LU-27 to LU-35 support a gradual evolution of the existing auto-oriented downtown to include multistory mixed use, pedestrian orientation, civic uses and gathering spaces, and a variety of employment and housing opportunities. Policies LU-36 to LU-42 further a vision for the Lakepointe Urban Village that emphasizes a variety of housing choices, integrated with open spaces, trails, and other public amenities.
- Policy LU-6 encourages green and low impact development that avoids impacting critical areas and achieves environmental and public health benefits from low-impact stormwater strategies, renewable energy systems, urban forests, and support for nonmotorized travel and transit.
- Policy LU-7 encourages efficient use of infrastructure by directing growth to sites for infill and redevelopment that are already served by existing systems and facilities.
The Action Plan in Exhibit LU-15 addresses next steps by multiple departments to advance public realm improvements that improve livability and support development objectives with a focus on urban design, open space, and opportunities for active transportation.

The plan has a specific Framework Goal to promote safety and well-being by creating opportunities for access to a variety of food venues, community services, and active recreation that make healthy choices easy choices. There are policies in several elements (e.g., land use, housing, transportation) that promote walkability, increased safety, and active living as well as improved access to healthy food choices.

**DISCUSSION: CONDITIONS FOR CERTIFICATION**

Covington must address the following provision of the Growth Management Act and VISION 2040 in order to maintain certified status:

- RCW 36.70A.130 requires that local comprehensive plan updates accommodate the growth projected to occur over the subsequent 20-year period. VISION 2040 (MPP-DP-3) calls for countywide adoption of housing and employment growth targets that promote the Regional Growth Strategy. MPP-T-9 calls for coordination of state, regional, and local transportation planning in support of that strategy. RCW 36.70A.070 requires the transportation element of local comprehensive plans to implement and be consistent with the land use element.

To implement the Regional Growth Strategy, King County and its cities developed housing and employment targets for the 2006-2031 period. The targets allocate a modest amount of housing and jobs to Small Cities, which includes the City of Covington, as a reflection of the stated regional role for these cities to accommodate limited growth. The targets for Covington are to grow by 1,470 housing units and 1,320 jobs over the period of 2006-2031. Extended to the plan horizon year of 2035, targeted growth is 1,705 housing units and 1,531 jobs.

**Background**

The Covington comprehensive plan, Toward Planning Greatness: Comprehensive Plan 2015-2035, establishes a long range vision for how the city will accommodate growth and is largely consistent with the Growth Management Act and VISION 2040. However, the plan as adopted supports an amount of residential and employment growth that is more than double the city’s remaining housing target and nearly ten times the city’s remaining jobs target. Because this level of growth is a departure from implementation of the Regional Growth Strategy, it raises concerns about impacts to the regional transportation plan.

The table below summarizes the city’s adopted growth targets, actual growth that occurred since the target base year, and remaining growth targets for the planning period. In comparison, the table also shows planned growth in the Covington comprehensive plan and information on growth anticipated from projects in the development pipeline.
Growth Statistics for Covington

<table>
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<tr>
<th></th>
<th>Housing</th>
<th>Jobs</th>
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<tbody>
<tr>
<td><strong>Growth Targets 2006-2035</strong></td>
<td>1,705</td>
<td>1,531</td>
</tr>
<tr>
<td><strong>Actual Growth 2006-2012</strong></td>
<td>163</td>
<td>1,148</td>
</tr>
<tr>
<td><strong>Remaining Target to 2035</strong></td>
<td><strong>1,542</strong></td>
<td><strong>383</strong></td>
</tr>
<tr>
<td><strong>Development in Pipeline</strong></td>
<td>622</td>
<td>514</td>
</tr>
<tr>
<td><strong>Lakepointe Capacity</strong></td>
<td>1,500</td>
<td>1,889</td>
</tr>
<tr>
<td><strong>Additional Capacity in City</strong></td>
<td>2,164</td>
<td>2,093</td>
</tr>
<tr>
<td><strong>Total Capacity (2012)</strong></td>
<td>4,286</td>
<td>4,496</td>
</tr>
<tr>
<td><strong>Planned Growth 2012-2035</strong></td>
<td><strong>3,920</strong></td>
<td><strong>3,706</strong></td>
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</table>

The plan describes several local factors which provide important context to explain why the city has chosen to plan for this level of growth. First, the city has progressed substantially toward achieving its growth targets through actual growth since 2006. With growth anticipated through completion of projects in the development pipeline, the city will exceed its employment target. Assuming full buildout of the Lakepointe Urban Village master planned development within the planning period, the city would exceed its housing target as well. Above and beyond the project-based data, the city is assuming market demand, based on analysis completed by Berk Associates in 2012, for even more growth accommodated on existing zoned capacity elsewhere in the city, including in its downtown.

PSRC staff has had extensive discussions with staff from the City of Covington regarding these factors along with many of the policies and actions the city has adopted to manage its growth. The city has provided a letter to PSRC, dated February 22, 2016, summarizing its perspective on these factors and actions.

**Conditions**

In order to further address the significant inconsistency between the city’s planned growth and the adopted targets, the following conditions need to be addressed:

**Clarify policy support for the Regional Growth Strategy.** The plan currently includes a Statement of Consistency that acknowledges the Regional Growth Strategy, including the role of designated Small Cities and the objective to limit growth in those cities. The plan should be amended to state more clearly that the city intends to explore and implement, where feasible, strategies to shape the amount or timing of growth to better align with the growth targets and with VISION 2040.

**Update and adjust growth assumptions.** The city should consider a reassessment of growth potential within the 20-year planning period based on current data, regional and countywide policies, and local actions taken to influence the amount or timing of future development. As called for in Policy LU-3, the city may work with King County to adjust the growth targets, while maintaining consistency with the Regional Growth Strategy.

**Manage long-term growth to address impacts and to better align with VISION 2040.** The city should identify and pursue available strategies to help bend the trend of growth rates to more closely align with the adopted growth targets. The city’s ability to reduce the rate of growth may be limited by unavoidable factors, such as entitlement of additional residential and commercial growth in the development pipeline. Other plan elements, including transportation, should be updated to reflect revisions to planned amounts of growth.

To the extent unavoidable growth in the city significantly exceeds agreed upon growth targets, coordinated action to provide urban infrastructure and services is even more important. The plan, as
adopted, addresses many relevant areas of ongoing work, including impact fees and expanded transit service. The city should explore whether further work is necessary to ensure adequate infrastructure and services to support and mitigate the impacts of anticipated growth.

**DISCUSSION: AREAS FOR FURTHER WORK**

The city should address the following comment at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans:

- **VISION 2040 (see MPP-DP-1)** promotes a framework to ensure the “long term stability and sustainability of the urban growth area” (UGA). MPP-G-1 calls for coordinated planning among agencies around issues of regional significance. The draft comprehensive plan (see Policy LU-20) supports expansion of the urban growth area adjacent to the City of Covington in order to “correct illogical boundary lines” through coordination with King County and the countywide planning policies. Absent a demonstrated need for countywide capacity, as described in those policies, the proposed UGA expansion may not be appropriate and the city should consider amending the plan to revise or remove Policy LU-20.

**Housing**

**SCOPE OF REVIEW**

VISION 2040 calls for local comprehensive plans to address the following housing policy topics:

- **Increased housing production opportunities**, including diverse types and styles for all income levels and demographic groups.
- **Affordable housing needs**, including an assessment of existing and future housing needs based on regional and local factors, including household income, demographics, special needs populations, and adequacy of existing housing stocks.
- **Regional housing objectives** in VISION 2040, including promotion of housing diversity and affordability, jobs-housing balance, housing in centers, and flexible standards and innovative techniques.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**

The city’s comprehensive plan effectively addresses the housing provisions in VISION 2040. Highlights include:

- The housing element addresses broadly many facets of future housing need. Existing conditions data, presented in a supplementary chapter, provide a rich basis for policies and actions to address those needs. The analysis shows gaps between the existing housing stock and current and future demand for affordable housing, including senior housing and housing that meets the needs of the local workforce. While the housing element could be more explicit in addressing the city’s role in meeting the countywide need for affordable housing set forth in the countywide planning policies, the element as a whole is responsive to that goal.

- The plan provides for a much greater variety of housing types to meet needs of current and future residents than currently is represented in the predominantly single-family ownership housing stock in the city. Policy HO-2 promotes strategies to add to the housing choices in Covington units in multifamily and mixed use projects, small lot single family, accessory dwelling units, and innovative housing types, such as cottage housing.

- One key focus of the housing element is meeting the needs of seniors and people with disabilities. Policy HO-4 supports new development that would allow more local residents to age in place and with appropriate supported housing.

- Policy HO-12 calls for implementation of a range of actions under the human services master plan in order to provide support low-income, disabled, and senior residents.

- HO-1 encourages housing that accrues many of the benefits of transit-oriented development, including reduced transportation costs, a lively public realm, and opportunities for active transportation.
The housing action plan includes consideration of changes to code to encourage green building, universal design, and active living.

**DISCUSSION: AREAS FOR FURTHER WORK**
The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on housing.

### Economy

**SCOPE OF REVIEW**
VISION 2040 calls for local comprehensive plans to address the following economic development policy topics:

- Include an **economic development element** that addresses business, people, and places.
- **Retention and recruitment efforts** that support family wage jobs, industry clusters that export goods and services, and small businesses that are locally owned.
- **Equitable benefits and impacts**, including provisions and programs that promote economic vitality in distressed areas or areas with disadvantaged populations.
- **Adequate housing growth in centers** through collaboration with the private sector and through the provision of infrastructure.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**
The city’s comprehensive plan effectively addresses many of the economic provisions of VISION 2040. Highlights include:

- An economic development element sets clear goals, policies, and actionable strategies intended to diversify the local economy, support a sufficient tax base to expand local services, and provide expanded choices for local employment.
- Part of the city’s economic strategy focuses on bolstering local capture of the health care sector employment growth, leveraging recent development of medical office and clinic facilities in the city.
- The plan employs place-based strategies to focus employment within new and developing mixed-use centers, including within downtown Covington and the Lakepointe Urban Village area.

**DISCUSSION: AREAS FOR FURTHER WORK**
The certification review did not identify any additional areas for improvement of the plan to better align with regional guidelines and principles on the economy.

### Transportation

**SCOPE OF REVIEW**
VISION 2040 and Transportation 2040 call for local comprehensive plans to address the following transportation policy topics:

- **Maintenance, management, and safety**, including clean transportation with reductions in pollution and greenhouse gas emissions, environmental factors, health and safety, stable and predictable funding sources, system and demand management strategies, and security and emergency response.
- **Support for the Regional Growth Strategy**, including system improvements that align with planned growth, prioritized investments that support compact development in centers, joint- and mixed-use development, complete streets and improvements to promote biking and walking, and context-sensitive design.
- **Improved transportation options and mobility**, including alternatives to driving alone, facilities and services for special needs transportation, avoidance of new or expanded facilities in rural areas, and financing methods.
Linking land use and transportation, including integrating Transportation 2040 physical design guidelines in planning for centers and transit station areas, and land development tools that promote transportation alternatives.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**

The city’s comprehensive plan effectively addresses the major transportation emphases in VISION 2040 and Transportation 2040, including maintenance, management, and safety; support for the Regional Growth Strategy; and providing greater options and mobility. Highlights include:

- The capital facilities appendix to the plan includes a comprehensive financing plan for public improvements needed through the year 2035. The plan shows planned projects with costs and estimated revenues that may be expected to fund those improvements. With a significant gap between revenues and costs, the plan identifies several potential revenue-boosting strategies along with a contingency plan that includes possibly revising level-of-service standards and/or the land use plan.

- The plan broadly promotes land uses and urban design that align with the existing and planned transportation system, such as through Policy LU-11 requiring that new development include features that support multiple modes of travel.

- The concept of ultimate capacity as applied to SR 516 makes clear a baseline for managing demand once improvements are complete on widening of the corridor to 5 lanes, thus encouraging demand management strategies, including transit, land use and design strategies, and interjurisdictional coordination to effectively manage the corridor in the future.

- The pedestrian and bicycle components of the plan work toward full integration with the regional trail network, with dual emphases on mobility benefits and health, recreation, and active living benefits.

**DISCUSSION: AREAS FOR FURTHER WORK**

The certification review did not identify any additional areas for improvement of the plan to better align with regional guidelines and principles on transportation.

**Public Services**

**SCOPE OF REVIEW**

VISION 2040 calls for local comprehensive plans to address the following public services policy topics:

- **Promote more efficient use of existing services**, such as waste management, energy, and water supply, through conservation – including demand management programs and strategies.

- **Promote renewable energy and alternative energy sources**.

- **Plan for long-term water needs**, including conservation, reclamation and reuse.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**

The city’s comprehensive plan effectively addresses the public services provisions of VISION 2040. Highlights include:

- The plan promotes energy conservation related to public and private uses. Policies CF-41 and 44 address energy-efficient fixtures and street lighting. Policy CF-43 provides broad support for using sustainable energy sources as a means to mitigate climate change.

- The plan addresses water supply efficiencies through policies that promote sustainable water use (CF-37) and reuse (CF-41).

**DISCUSSION: AREAS FOR FURTHER WORK**

The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on public services.
Conclusion

PSRC staff thank the jurisdiction for working through the plan review process. PSRC is available to provide assistance for future plan updates and additional planning resources can also be found at http://www.psrc.org/growth/planreview/resources/. If the city has questions or needs additional information, please contact Michael Hubner at 206-971-3289 or mhubner@psrc.org.