



16720 SE 271st Street, Suite 100 • Covington, WA 98042 • (253) 480-2400 • Fax: (253) 480-2401

The City of Covington is a destination community where citizens, businesses, and civic leaders collaborate to preserve and foster a strong sense of unity.

PLANNING COMMISSION AGENDA

April 17, 2025

6:30 PM

In compliance with state law, this Planning Commission's regular meetings will be held in a hybrid format with in-person, telephonic, and virtual options for public viewing and participation.

This Planning Commission meeting will be held telephonically and virtually as follows:

Join In Person: Covington City Hall, Council Chambers, 16720 SE 271st Street, Covington, WA 98042

Join by computer: <https://us02web.zoom.us/j/86806796083>

Join by Telephone: +1 (253) 215-8782

Webinar ID: 868 0679 6083

CALL TO ORDER

ROLL CALL

Chair Kenner Ahrendsen, Vice-Chair Kathy Fosjord, David Caudle, Steven Bossom, Stephanie Hunziker and Rajschekar Manaliker.

PLEDGE OF ALLEGIANCE

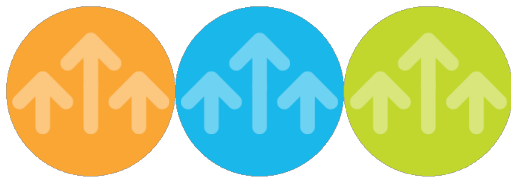
APPROVAL OF AGENDA

APPROVAL OF CONSENT AGENDA

1. March 20, 2025, Planning Commission Minutes

*CITIZEN COMMENTS - The Citizen Comment period provides the opportunity for members of the audience to address the Commission on items either not on the agenda or not listed as a Public Hearing. The Chair will open this portion of the meeting and ask for a show of hands of those persons wishing to address the Commission. When recognized, please approach the podium, give your name and city of residence, and state the matter of interest. If your interest is an Agenda Item, the Chair may suggest that your comments wait until that time. Citizen Comments are directed to the Planning Commission, not the audience or staff. Comments are not intended for conversation or debate. Citizen comments will be limited to four minutes for Citizen Comments. If you require more than the allotted time, your item will be placed on the next agenda. **Reminder – If you've dialed in for this meeting you must press *9 to raise your hand to speak.*

If you anticipate your comments taking longer than the allotted time, you are encouraged to contact the Planning Department ten days in advance of the meeting so your item may be placed on the next available agenda.



city of
covington
growing toward greatness

PUBLIC HEARING AND RECOMMENDATION: NONE

NEW BUSINESS:

1. Emergency Management City Presentation
2. Shoreline Master Program Chapter 16.05 CMC Code Amendment

OLD BUSINESS: NONE

ATTENDANCE VOTE

CITIZEN COMMENTS: (Same rules apply as stated in the 1st CITIZEN COMMENTS)

COMMENTS AND COMMUNICATIONS OF STAFF AND COMMISSIONERS

ADJOURN

*Any person requiring disability accommodation should contact the City at least 24 hours in advance.
For TDD relay service please use the state's toll-free relay service (800) 833-6384 and ask the operator to dial (253) 480-2400
Web Page: www.covingtonwa.gov*



Planning Commission Minutes

March 20, 2025,

**Hybrid Meeting through Zoom/City
Hall Council Chambers**

CALL TO ORDER

The meeting of the Planning Commission was called to order at 6:38 p.m. by Chair Kenner Ahrendsen.

MEMBERS PRESENT

Chair Kenner Ahrendsen, Vice-Chair Kathy Fosjord, David Caudle, Steven Bossom and Stephanie Hunziker (arrived late during new business item number 1).

MEMBERS ABSENT:

Rajschekar Manaliker

STAFF PRESENT

Salina Lyons, Community Development Director

Dafne Hernandez, Associate Planner

Alicia Camp, Permit/Planning Technician

APPROVAL OF AGENDA

- **Commissioner David Caudle moved, and Commissioner Vice-Chair Kathy Fosjord seconded the motion to approve the agenda, with modifications to change of date for the agenda from February 20th, 2025, to reflect March 20th, 2025. The motion carried 4-0.**

APPROVAL OF CONSENT AGENDA

- **Commissioner Steven Bossom moved, and Commissioner David Caudle seconded the motion to approve February 20th, 2025, Planning Commission minutes. The motion carried 4-0.**

CITIZEN COMMENTS – NONE

PUBLIC HEARING AND RECCOMENDATION: NONE

NEW BUSINESS

1. City staff and city consultants gave a presentation to the non-motorized plan. Discussion and questions followed by the Planning Commission.
2. City staff gave a presentation on setbacks regarding the middle housing code amendments. Discussion and questions followed by the Planning Commission.

OLD BUSINESS – NONE

ATTENDANCE VOTE – NONE

CITIZENS COMMENTS – NONE

COMMENTS AND COMMUNICATIONS FROM STAFF AND COMMISSIONERS

ADJOURN

March 20, 2025, Planning Commission Meeting adjourned at approximately 8:38 p.m.

These minutes are intended to reflect the action taken during the Planning Commission meeting. The audio recording is available upon request.

Respectfully submitted,

Alicia Camp, Permit / Planning Technician

To: Planning Commission
From: Dafne Hernandez, Associate Planner
CC: Salina Lyons, Community Development Director
Date: April 10, 2025
RE: **City of Covington – Emergency Management Introduction**

1. How the City Plans for Emergencies and Builds Resilience

This agenda introduces the City of Covington’s Emergency Management program through a presentation by Andy Jenkins, Emergency Management Program Manager. Andy will provide an overview of his role, highlight current emergency preparedness initiatives, and be available to answer questions from the Planning Commission.

EMERGENCY MANAGEMENT

The Covington Municipal Code establishes the [Emergency Management Department and the Emergency Operations Center](#) (EOC) within the purview of the City Manager. The Emergency Management Director has been designated by the City Manager to coordinate emergency preparedness and management activities within the City of Covington. The Emergency Management Division is comprised of:

- Emergency Management Planning Committee
- City Leadership Team
- Emergency Management Director
- Emergency Management Program Coordinator
- Emergency Operations Center (EOC)

The Emergency Management Division of the City of Covington is charged with carrying out the following program:

1. Comprehensive Emergency Management Plan (CEMP): Maintains and updates the City’s CEMP, which outlines how the City organizes and responds during disasters, covering mitigation, preparedness, response, and recovery operations
2. Hazard Mitigation Planning. Develops and updates the City's Hazard Mitigation Plan, which identifies risks and provides strategies to reduce the impact of known hazards.
3. Community Preparedness and Outreach. Provides educational programming and resources to help residents, schools, and businesses become more self-sufficient in the face of emergencies.
4. Training and Coordination: Assists City departments with training for emergency response and fosters coordination with contract responders, support organizations, and local, regional, and federal agencies.

COMPREHENSIVE EMERGENCY MANAGEMENT PLAN

The Comprehensive Emergency Management Plan provides the framework for these organizational activities during disaster operations and guides the Emergency Management Organization for mitigation, preparedness, response, and recovery operations. This includes disaster and emergency responsibilities, training, and community education activities.

[Comprehensive Emergency Management Plan](#) (PDF) - Adopted April 25, 2023

This discussion also relates to the city's Hazard Mitigation Plan, which is referenced throughout the climate work. This plan and the City's Comprehensive Emergency Management Plan help guide how the City prepares for, responds to, and recovers from emergencies, including those that may be worsened by climate-related events.

[Hazard Mitigation Plan Annex](#) - Adopted July 14, 2020 (The City of Covington has adopted the Hazard Mitigation Plan Annex to the King County Regional Hazard Mitigation Plan.)

CLIMATE-RELATED EVENTS AND EMERGENCY MANAGEMENT

In recent commission discussions on climate and resiliency, a recurring theme has been how we respond to the increasing risks associated with climate-related events, such as extreme weather, wildfires, or prolonged power outages. One important component of this conversation is understanding what actions the City is currently taking and can take in the future to support emergency response and community preparedness.

Attachment 1: How the City Plans for Emergencies and Builds Resilience is a working document that outlines how the City prepares for and responds to both climate-related and non-climate-related emergency events. It identifies responsible departments, coordination roles, key external partners, and the policy or regulatory basis for action. This document is intended to support understanding of the City's emergency management systems and how those systems intersect with broader planning for resilience. Additional questions or topics may be added as this resource evolves to reflect local needs and state planning requirements.

What can you do to plan for emergencies and build resilience? The Emergency Management Program has useful information available on the website, including links to [education and training opportunities](#) and information how to be alerted [and prepared in an emergency](#) – climate or non-climate related.

Planning Commission Action:

- No action. Discussion and questions for staff.

How the City Plans for Emergencies and Builds Resilience: A Systems Overview

This document provides an overview of how the City prepares for and responds to a range of emergencies, whether caused by natural events, infrastructure failures, or long-term environmental trends. It highlights how different departments coordinate actions, what policies and plans guide their work, and how regional partners support our efforts.

This overview also supports recent state requirements (like HB 1181 – Climate Commitment Act) to consider climate resilience and risk in local planning efforts. The information is grouped into climate-related and non-climate-related event types to help clarify how different risks are managed within existing systems.

How it all connects:

Emergency planning and climate resilience are part of a shared system of policies, plans, and operational procedures that help the City:

- Respond to emergencies quickly and effectively
- Protect residents and infrastructure
- Plan for long-term changes — whether environmental, demographic, or economic
- Coordinate with regional and state partners to meet regulatory expectations and community needs

[Comprehensive Emergency Management Plan](#) (PDF) - Adopted April 25, 2023

[Hazard Mitigation Plan Annex](#) - Adopted July 14, 2020 (The City of Covington has adopted the Hazard Mitigation Plan Annex to the King County Regional Hazard Mitigation Plan.)

[Climate Vulnerability Assessment](#) - 2024-2044 Comprehensive Plan, Appendix IV – Adopted December 10, 2024

[Climate Vulnerability Index web-based tool](#) – spatial modeling

Climate-Related Events

Question	City Role(s)	Partners	Basis (Policies, Codes, Plans, Systems)
How does the City respond to extreme weather events?	Emergency Management Director, Emergency Mgmt Program Coordinator, Public Works, Police	Puget Sound Regional Fire Authority, KC OEM, King County Sheriff's Office	Emergency Operations Plan (EOP), Incident Command System (ICS), snow/heat protocols, public alert systems
How does the City support state and regional goals to	Community Development	Department of Commerce, PSRC	Comprehensive Plan, Climate Element, development regulations,

Question	City Role(s)	Partners	Basis (Policies, Codes, Plans, Systems)
reduce greenhouse gas emissions?		(coordination only), State Building Council	International Building Codes, and State Energy Codes.
How is the City planning for wildfire smoke or air quality issues?	Emergency Management, City, and other stakeholder (schools, churches, etc.) facilities	WA Dept. of Ecology, Puget Sound Clean Air Agency	Public health alerts, clean air shelter spaces, and communication protocols
What role does land use planning play in reducing climate vulnerability?	Community Development	PSRC (Vision 2050), King County Planning-wide Planning policies, State Legislative Requirements, Climate Commitment Act (HB 1181), Net Zero by 2025	2024-2044 Comprehensive Plan (Land Use, Natural Environment, Capital Facilities, Climate Element), zoning and development regulations (trees, stormwater, design and construction, etc.)
How does the City plan for flooding and increased rainfall?	Public Works (Surface Water), Emergency Management	WA Dept. of Ecology, FEMA	Surface Water Master Plan, Floodplain mapping, Jenkins Creek coordination, and dam risk awareness (Howard Hanson Dam)
How is the City planning for population growth and shifting conditions?	Planning & Community Development	PSRC, King County	2024-2044 Comprehensive Plan growth strategies, infrastructure planning

Non-Climate Events

Question	City Role(s)	Partners	Basis (Policies, Codes, Plans, Systems)
What happens when there are widespread power outages?	Emergency Management Program Coordinator, Public Works	Puget Sound Energy (PSE), King County Sheriff's Office	Utility coordination protocols, EOP, zoning for energy infrastructure, public alerts
How is the City prepared for earthquakes or seismic risk?	Emergency Management Director, Building Division	King County OEM, WA State EMD	IBC/WIBC seismic building codes, EOP, Emergency Management Planning Committee
Who handles communication during regional disasters?	Emergency Management Director, Emergency Mgmt Program Coordinator	KC OEM, WA State EMD, Public Information Officers	ICS, Joint Information System (JIS), mutual aid agreements
How does the city ensure that new development doesn't increase emergency risk?	Planning & Building, Emergency Management	Puget Sound Regional Fire Authority, Ecology, King County	Comp Plan policies, development regulations, WUI standards, SEPA review
What can the City do if critical infrastructure is threatened?	Public Works, Emergency Management	Franchise Utilities, KC OEM	CIP planning, utility franchise agreements, EOP infrastructure response coordination
What is the City's role in regional climate and hazard planning?	Community Development, Emergency Management Director	PSRC, WA State, Dept. of Commerce, Ecology	Hazard Mitigation Plan, PSRC Vision 2050, Climate Commitment Act references

To: Planning Commission

From: Community Development Long Range Team

Date: April 10, 2025

RE: Agenda Item 2– SMP Code Amendments – Shoreline Buffer Structures for Water Enjoyment

Attachments

1. Draft 16.05 Shoreline Master Plan (SMP) Code Amendment Redlines
2. FACET Memo re: SMP

PURPOSE

This memo outlines proposed amendments to the City's Shoreline Master Program (SMP) to clarify the permissibility of structures within the shoreline buffer, specifically those intended for water enjoyment.

City staff and FACET consulting will provide a presentation during the meeting and help answer questions.

What is the Shoreline Master Program (SMP)?

The Shoreline Management Act (SMA), adopted by the Washington State Legislature in 1971 and codified in RCW 90.58, establishes a cooperative program between local and state government to manage, protect, and enhance the state's shorelines. Under the SMA, all cities and counties with "shorelines of the state" must develop and implement a Shoreline Master Program (SMP) that regulates land use and development along these areas.

The SMA also requires each jurisdiction to periodically review and, if necessary, revise its SMP on an eight-year schedule to remain current with changes in state law, new data, and local comprehensive plans and development regulations (RCW 90.58.080(4)).

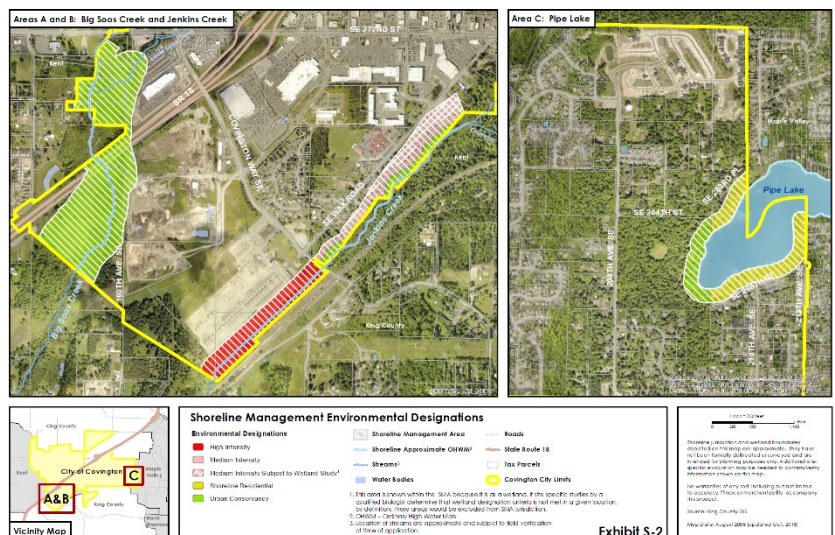
Covington SMP was updated in 2019 and is codified in [CMC 16.05](#).

Shorelines in Covington: What Qualifies?

Not all streams in Covington fall under SMP jurisdiction. To qualify as a "shoreline of the state," a stream must meet specific thresholds, typically including:

- Mean annual flow of at least 20 cubic feet per second (cfs) (WAC 173-22-030 and RCW 90.58.030(2)(d)).

In Covington, portions of Jenkins Creek and Big Soos Creek meet this threshold and are regulated under the SMP. As illustrated in the city's high-level map, these segments are located south of SE 272nd St and within the city's downtown zone. Additionally, Pipe Lake is within the SMP at the city's east boundary.



Where streams do not meet the shoreline designation, development is regulated under the City's Critical Area Ordinance (CMC 18.65), which establishes buffers and setback requirements for wetlands and streams.

Why are we proposing SMP amendments now?


Since the 2019 adoption, the SMP has been applied to several major public projects, most notably Founders Park and Jenkins Creek Park, both of which intersect with Jenkins Creek and other regulated areas. As these parks move from planning to construction, city staff have identified a regulatory gap: while the SMP recognizes "water enjoyment" as a shoreline use, it does not clearly allow associated structures, such as trails, overlooks, or interpretive elements within shoreline buffers.

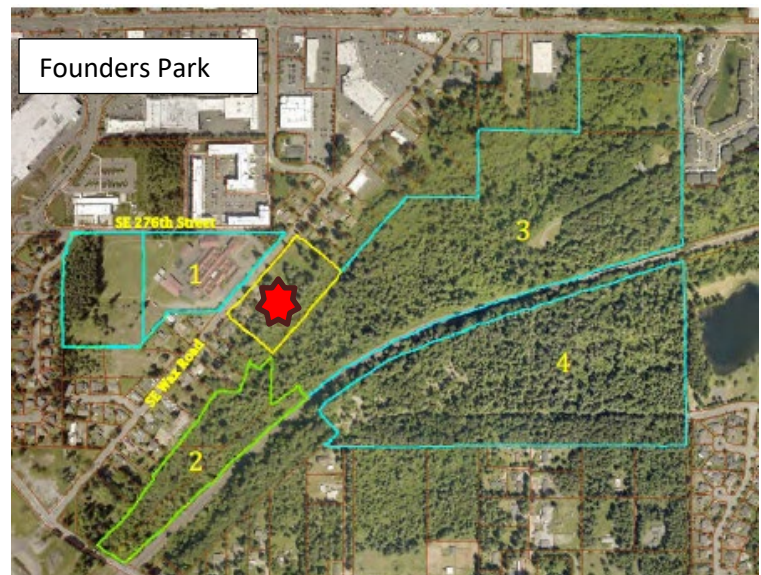
Under the current city code (CMC 16.05.350), structures are generally prohibited within wetland and shoreline buffers. While this code aims to protect ecological functions, there is growing recognition that limited, low-impact development associated with public recreational access—namely "structures for water enjoyment"—can be compatible with shoreline protection goals when appropriately designed and implemented.

As these parks are developed or improved, opportunities for public access to shoreline areas increase. This raises the importance of ensuring that the SMP appropriately accommodates structures intended for water enjoyment, such as trails, overlooks, and interpretive features, while maintaining critical environmental protections. Currently, "water enjoyment" is a defined use in the SMP but is not explicitly recognized in shoreline recreational development standards, leaving ambiguity around the permissibility of associated structures.

Background on Affected City Park Projects

The City of Covington is currently in the process of constructing Founders Park and designing the Jenkins Creek Park Trail. Two major parks and trail projects intersect with shoreline and wetland corridors. These parks are identified in the adopted Parks, Recreation, and Open Space (PROS) Plan and provide major opportunities for shoreline enjoyment and public access.

-  **Founders Park (formerly known as SoCo Park)**
 - 5.45-acre park located at 17081 SE Wax Road
 - It contains a segment of Jenkins Creek and is across Wax Road from the city-owned Town Center site (1).
 - The City of Covington owns 9.95 acres along Jenkins Creek (2).
 - The City of Kent owns 58.37 acres along Jenkins Creek (3).
 - King County owns 40.56 acres across the BNSF railroad tracks (4).
- **Jenkins Creek Park Trail**
 - In the master planning and design phase (Lead Department: Parks and Recreation - [website](#))
 - 3-mile multi-use, recreation trail that will run through the city connecting neighborhoods, schools, healthcare facilities, parks, and commercial areas. (Downtown to Lakepointe Urban Village)



- Connects to King County's regional trail network at each end (Soos Creek Regional Trail & Green to Cedar Rivers Trail).
- The portion of the Jenkins Creek trail planned from Jenkins Creek Park to Founders Park, south of SE 272nd St, is in the SMP.

ISSUES AND PROPOSED AMENDMENTS

1. Restriction of Structures in Buffers

Covington's existing code (CMC 16.05.350) strictly prohibits structures in the wetland and shoreline buffers.

This prohibition includes recreational development, which currently does not differentiate between general development and water enjoyment uses.

2. Water Enjoyment Definition Present, But Not Integrated

While "water enjoyment" is a defined term in our code, it is not reflected or accounted for in the recreational development provisions of CMC 16.05.350. This creates a regulatory gap and limits our ability to permit low-impact amenities such as viewing platforms, trails, or benches.

3. Joint Review Requirement with Ecology

Because this change affects the SMP, the Department of Ecology will have joint review authority. Ecology will review any proposed amendments and has the final determination on the acceptability of regulatory changes. They have agreed to share sample code from other jurisdictions that permit water enjoyment structures under specific criteria.

4. Ecology Recommendations

Ecology recommends that any allowance for structures supporting water enjoyment should be:

- Clearly tied to a larger planning process (e.g., a master plan or park planning document).
- Designed to minimize environmental impacts and preserve buffer functions.
- Limited to those structures that serve an essential recreational or interpretive function.

KEY PROPOSED CODE CHANGES

Attachment 1 shows the proposed amendments to the SMP. FACET's memo, **Attachment 2**, provides further detail on the amendment and adoption process with Ecology.

- Add language to [CMC 16.05.350](#) to allow water enjoyment structures in shoreline buffers when:
 - They are part of an adopted public master plan or similar planning effort.
 - They are designed and located to minimize environmental impacts.
 - They maintain the overall integrity of the buffer.
- Clarify definitions and applicability by ensuring the term "water enjoyment" is linked to permissible recreational uses in the shoreline area.



- Add criteria to evaluate water enjoyment structures, potentially including siting standards, materials, footprint limits, and vegetation retention requirements.

NEXT STEPS

- Planning Commission Action: Review and provide feedback on the proposed amendments. Coordinate with the Department of Ecology for a joint hearing and updates to the SMP.
- Conduct a public hearing at the June 5th meeting.
- Issue SEPA
- Submit to the Department of Commerce for a 60-day review.

EXHIBIT A

Chapter 16.05
SHORELINE MASTER PROGRAM**Article I. General Provisions****16.05.030 Definitions.**

This section contains definitions of terms that apply within shoreline jurisdiction. The definitions in this section supplement the terms defined in the Shoreline Management Act (Chapter 90.58 RCW). Unless otherwise defined in this chapter, the definitions provided in Chapter 18.20 CMC shall be applicable. If there is a conflict, the definitions in this section shall govern.

(1) "Adjacent lands" means lands adjacent to the shorelines of the State (outside of shoreline jurisdiction). The SMA directs local governments to develop land use controls (i.e., zoning, comprehensive planning) for such lands consistent with the policies of the SMA, related rules and the local shoreline master program (see RCW 90.58.340).

(2) "Administrator" means the City Community Development Director or his/her designee, charged with the responsibility of administering the shoreline master program.

(3) "Agriculture" or "agricultural activity" means agricultural uses and practices including, but not limited to: producing, breeding, or increasing agricultural products; rotating and changing agricultural crops; allowing land used for agricultural activities to lie fallow in which it is plowed and tilled but left unseeded; allowing land used for agricultural activities to lie dormant as a result of adverse agricultural market conditions; allowing land used for agricultural activities to lie dormant because the land is enrolled in a local, State, or Federal conservation program, or the land is subject to a conservation easement; conducting agricultural operations; maintaining, repairing, and replacing agricultural facilities; provided, that the replacement facility is no closer to the shoreline than the original facility; and maintaining agricultural lands under production or cultivation.

EXHIBIT A

- (4) "Anadromous fish" means species, such as salmon, which are born in fresh water, spend a large part of their lives in the sea, and return to freshwater rivers and streams to procreate.
- (5) "Appurtenance" means a structure or development which is necessarily connected to the use and enjoyment of a single-family residence and is located landward of the ordinary high water mark and also of the perimeter of any wetland. (On a Statewide basis, normal appurtenances include a garage, deck, driveway, utilities, fences, installation of a septic tank and drain field, and grading which does not exceed 250 cubic yards (except to construct a conventional drain field) and which does not involve placement of fill in any wetland or waterward of the ordinary high water mark) (see WAC 173-27-040(2)(g)).
- (6) "Aquaculture" means the culture or farming of fish, shellfish, or other aquatic plants and animals. Aquaculture does not include the harvest of wild geoduck associated with the State managed wildstock geoduck fishery.
- (7) "Associated wetlands" means those wetlands that are in proximity to and either influence, or are influenced by, tidal waters or a lake or stream subject to the Shoreline Management Act. Refer to WAC 173-27-030(1).
- (8) "Average grade level" means the average of the natural or existing topography of the portion of the lot, parcel, or tract of real property which will be directly under the proposed building or structure; provided, that, in case of structures to be built over water, average grade level shall be the elevation of ordinary high water. Calculation of the average grade level shall be made by averaging the elevations at the center of all exterior walls of the proposed building or structure (WAC 173-27-030(3)).
- (9) "Beach enhancement/restoration" means the process of restoring a beach to a state more closely resembling a natural beach, using beach feeding, vegetation, drift sills and other nonintrusive means as applicable.
- (10) "Boat launch or ramp" means graded slopes, slabs, pads, planks, or rails used for launching boats by means of a trailer, hand, or mechanical device.
- (11) "Boat lift" means a mechanical device that can hoist vessels out of the water for storage. These devices are usually located along a pier.
- (12) "Boat rail or railway" means a set of steel rails running from the upland area into the water upon which a cart or dolly can carry a boat to be launched.

EXHIBIT A

- (13) "Boathouse" means a structure designed for storage of vessels located over water or upland. Boathouses should not be confused with "houseboats."
- (14) "Boating facility" means a moorage structure serving more than four single-family residences.
- (15) "Bulkhead" means a vertical or nearly vertical erosion protection structure placed parallel to the shoreline consisting of concrete, timber, steel, rock, or other permanent material not readily subject to erosion.
- (16) "Clearing" means the destruction or removal of vegetation, groundcover, shrubs and trees including root material and topsoil removal.
- (17) "Community structure" or "community dock facility" means a building, dock, or other structure which is intended for the common use of the residents of a particular subdivision or community. It is not intended to serve as a public facility.
- (18) "Conditional use" means a use, development, or substantial development that is classified as a conditional use or is not classified within the applicable master program. Refer to WAC 173-27-030(4).
- (19) "Cumulative impact" means the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.
- (20) "Development" means a use consisting of the construction or exterior alteration of structures; dredging; drilling; dumping; filling; removal of any sand, gravel, or minerals; bulkheading; driving of piling; placing of obstructions; or any project of a permanent or temporary nature which interferes with the normal public use of the surface of the waters of the State subject to Chapter 90.58 RCW at any state of water level (RCW 90.58.030(3)(d)). Development does not include dismantling or removing structures if there is no other associated development or redevelopment.
- (21) "Dock" means a structure commonly referred to as a floating moorage structure. See also "floating dock" and "float."

EXHIBIT A

(22) "Dredge spoil" means the material removed by dredging. Same as "dredge material."

(23) "Dredging" means excavation or displacement of the bottom or shoreline of a water body. Dredging can be accomplished with mechanical or hydraulic machines. Most dredging is done to maintain channel depths or berths for navigational purposes; other dredging is for shellfish harvesting or for cleanup of polluted sediments.

(24) "Ecological functions" means the work performed or the role played by the physical, chemical, and biological processes that contribute to the maintenance of the aquatic and terrestrial environments that constitute the shoreline's natural ecosystem.

(25) "Ecosystem-wide processes" means the suite of naturally occurring physical and geologic processes of erosion, transport, and deposition; and specific chemical processes that shape landforms within a specific shoreline ecosystem and determine both the types of habitat and the associated ecological functions.

(26) "Ell" means the terminal section of a pier which typically extends perpendicular to the pier walkway. These sections can be either on fixed-piles or floating docks and are typically wider than the pier walkway.

(27) "Emergency" means an unanticipated and imminent threat to public health, safety, or the environment which requires immediate action within a time too short to allow full compliance with the master program. Emergency construction is construed narrowly as that which is necessary to protect property from the elements (RCW 90.58.030(3)(e)(iii) and WAC 173-27-040(2)(d)).

(28) "Enhancement" means alteration of an existing resource to improve or increase its characteristics and processes without degrading other existing functions.

(29) "Exemption" means certain specific developments are exempt from the definition of substantial developments and are therefore exempt from the substantial development permit process of the SMA. An activity that is exempt from the substantial development provisions of the SMA must still be carried out in compliance with policies and standards of the Act and the local master program. Conditional use and/or variance permits may also still be required even though the activity does not need a substantial development permit (RCW 90.58.030(3)(e); WAC 173-27-030(7) and 173-27-040). For a complete list of exemptions, see CMC 16.05.050. See "Letter of exemption."

EXHIBIT A

(30) "Fair market value" means the expected price at which the development can be sold to a willing buyer. For developments which involve nonstructural operations such as dredging, drilling, dumping, or filling, the fair market value is the expected cost of hiring a contractor to perform the operation or, where no such value can be calculated, the total of labor, equipment use, transportation and other costs incurred for the duration of the permitted project (WAC 173-27-030(8)).

(31) "Fill" means the addition of soil, sand, rock, gravel, sediment, earth retaining structure, or other material to an area waterward of the ordinary high water mark, in wetlands, or on shorelands in a manner that raises the elevation or creates dry land.

(32) "Finger pier" means a narrow extension to a fixed-pile pier, usually extending perpendicular to the pier walkway along with an ell to form an enclosed area for boat moorage.

(33) "Float" means a floating structure that is moored, anchored, or otherwise secured in the water offshore and that is generally located at the terminal end of a fixed-pile pier.

(34) "Floating dock" means a fixed structure floating upon a water body for the majority of its length and connected to shore.

(35) "Floating home" means a single-family dwelling unit constructed on a float, that is moored, anchored, or otherwise secured in waters, and is not a vessel, even though it may be capable of being towed.

(36) "Floodway" means the area that has been established in effective Federal Emergency Management Agency flood insurance rate maps or floodway maps. The floodway does not include lands that can reasonably be expected to be protected from flood waters by flood control devices maintained by or maintained under license from the Federal government, the State, or a political subdivision of the State.

(37) "Forest practices" means activities not covered by the Forest Practices Act, especially Class IV – General forest practices involving conversion to non-forest use.

(38) "Groin" means a barrier-type structure extending from, and usually perpendicular to, the backshore into a water body. Its purpose is to protect a shoreline and adjacent upland by influencing the movement of water and/or deposition of materials. This is accomplished by building or preserving an accretion beach on its updrift side by trapping littoral drift. A groin is

EXHIBIT A

relatively narrow in width but varies greatly in length. A groin is sometimes built in a series as a system and may be permeable or impermeable, high or low, and fixed or adjustable.

(39) "Height" means the distance measured from the average grade level to the highest point of a structure; provided, that television antennas, chimneys and similar appurtenances shall not be used in calculating height, except where it obstructs the view of a substantial number of residences on areas adjoining such shorelines; provided further, that temporary construction equipment is excluded in this calculation (WAC 173-27-030(9)).

(40) "In-kind replacement" means to replace wetlands, habitat, biota or other organisms with substitute flora or fauna whose characteristics closely match those destroyed, displaced or degraded by an activity.

(41) "Landfill" means the creation of, or addition to, a dry upland area (landward of the OHWM) or the creation of, or addition to, an in-water area (waterward of the OHWM) by depositing material into waters or onto shoreline, upland dry areas, or wetland areas.

(42) *Launching Rail*. See "Boat railway."

(43) *Launching Ramp*. See "Boat launch or ramp."

(44) "Letter of exemption" means a letter issued by the City to indicate that a proposed development is exempted from the requirement to obtain a shoreline permit as provided in WAC 173-27-050. Letters of exemption may include conditions or other provisions placed on the proposal in order to ensure consistency with the Shoreline Management Act and this master program. The letter must indicate the specific exemption provision from WAC 173-27-040(2) that is being applied to the development and provide a summary of the City's analysis of the consistency of the project with the master program and the SMA.

(45) "Liberal construction" means a legal concept instructing parties interpreting a statute to give an expansive meaning to terms and provisions within the statute. The goal of liberal construction is to give full effect in implementing a statute's requirements. See RCW 90.58.900.

(46) "Littoral drift" means the movement of mud, sand, or gravel material moved parallel to the shoreline in the nearshore zone by waves and currents.

(47) "Minor trail" means a travel way that is constructed to accommodate one recreational non-motorized use.

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(487) “Mitigation” or “mitigation sequencing” means the process of avoiding, reducing, or compensating for the environmental impact(s) of a proposal. See WAC 173-26-020(30) and 197-11-768. “Mitigation” or “mitigation sequencing” means the following sequence of steps listed in order of priority, with subsection (47)(a) of this section being top priority:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action;
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation by using appropriate technology or by taking affirmative steps to avoid or reduce impacts;
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations;
- (e) Compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and
- (f) Monitoring the impact and the compensation projects and taking appropriate corrective measures.

(498) “Moorage” means any device or structure (such as a pier or buoy) used to secure a vessel for temporary anchorage.

(5049) “Moorage piles” means structural members that are driven into the lake bed to serve as a stationary moorage point. They are typically used for moorage of small boats in the absence of, or instead of, a dock or pier. In some cases, moorage piles may be associated with a dock or pier.

(519) “Mooring buoy” means a floating object anchored to the bottom of a water body that provides tie-up capabilities for vessels.

(52) “Multi-use trail” means a travel way that is designed to accommodate equestrians, cyclists, and pedestrians.

(534) “Native plants” or “native vegetation” means plants that occur naturally, and that distribute and reproduce without aid. Native plants in western Washington are those that existed prior to intensive settlement that began in the 1850s.

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(542) “Nonconforming use” means an existing shoreline use that was lawfully established prior to the effective date of the Act or the applicable master program, but which does not conform to present use regulations due to subsequent changes to the master program.

(553) “Nonconforming development” or “nonconforming structure” means an existing structure that was lawfully constructed at the time it was built but is no longer fully consistent with present regulations such as setbacks, buffers or yards; area; bulk; height or density standards due to subsequent changes to the master program.

(564) “Nonconforming lot” means a lot that met dimensional requirements of the applicable master program at the time of its establishment but now contains less than the required width, depth or area due to subsequent changes to the master program.

(575) “Normal maintenance” means those usual acts to prevent a decline, lapse, or cessation from a lawfully established condition (WAC 173-27-040(2)(b)). See also “Normal repair.”

(586) “Normal protective bulkhead” means a bulkhead, common to single-family residences, constructed at or near the ordinary high water mark to protect an existing single-family residence, and which sole purpose is for protecting land from erosion, not for the purpose of creating new land (WAC 173-27-040(2)(c)).

(597) “Normal repair” means to restore a development to a state comparable to its original condition within a reasonable period after decay or partial destruction except where repair involves total replacement which is not common practice or causes substantial adverse effects to the shoreline resource or environment (WAC 173-27-040(2)(b)). See also “Normal maintenance.”

(6058) “Ordinary high water mark” means that mark that will be found by examining the bed and banks and ascertaining where the presence and action of waters are so common and usual, and so long continued in all ordinary years, as to mark upon the soil a character distinct from that of the abutting upland, in respect to vegetation as that condition exists on June 1, 1971, as it may naturally change thereafter, or as it may change thereafter in accordance with permits issued by a local government or the department; provided, that in any area where the ordinary high water mark cannot be found, the ordinary high water mark adjoining fresh water shall be the line of mean high water. See RCW 90.58.030(2)(b) and WAC 173-22-030(11).

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(6159) “Overwater structure” means any device or structure projecting above and waterward of the ordinary high water mark, including but not limited to piers, docks, floats, and moorage.

(629) “Permit” or “shoreline permit” means any substantial development permit, variance, or conditional use permit, or revision, or any combination thereof, authorized by the Act. Refer to WAC 173-27-030(13).

(634) “Pier” means a fixed-pile overwater structure.

(642) “Public access” means the ability of the general public to reach, touch, and enjoy the water’s edge, to travel on the waters of the State, and to view the water and the shoreline from adjacent locations. Refer to WAC 173-26-221(4).

(653) “Public interest” means the interest shared by the citizens of the State or community at large in the affairs of government, or some interest by which their rights or liabilities are affected such as an effect on public property or on health, safety, or general welfare resulting from a use or development (WAC 173-27-030(14)).

(664) “Public use” means to be made available daily to the general public on a first-come, first-served basis, and may not be leased to private parties on any more than a day use basis. Refer to WAC 332-30-106.

(675) “Qualified professional” or “professional” means a person with experience and training in the pertinent scientific discipline, and who is a qualified scientific expert with expertise and/or certification appropriate for the relevant subject. A qualified professional must have obtained a B.S. or B.A. or equivalent degree in biology, engineering, environmental studies, fisheries, geomorphology, or related field and, unless otherwise specified in this master program, must have at least two years of related work experience.

(686) “Recreational facilities” means facilities such as parks, trails, and pathways that provide a means for relaxation, play, or amusement. For the purposes of this master program, recreational facilities do not include private residences and are divided into two categories:

- (a) Water-oriented (e.g., boating facilities, fishing piers, swim rafts); and
- (b) Non-water-oriented (e.g., sports fields, golf courses, RV camping).

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(697) “Recreational float” means a floating structure that is moored, anchored, or otherwise secured in the water offshore and that is generally used for recreational purposes such as swimming and diving.

(7068) “Restoration” means the act of revitalizing or restoring characteristics and processes of a shoreline, ecosystem, or habitat diminished or lost by past alterations, activities, or catastrophic events.

(7169) “Retrieval lines” means a system by which a float or other floating object is retrieved to a pier, dock, or shoreland.

(729) “Rotovating” means an aquatic vegetation harvesting technique that uses rototilling technology to uproot and remove plants.

(734) “Setback” means the minimum required distance between a structure and a specified line, such as a lot, easement or buffer line or the ordinary high water mark, that is required to remain free of structures.

(742) “Shorelands” or “shoreland areas” means those lands extending landward for 200 feet in all directions as measured on a horizontal plane from the ordinary high water mark; floodways and contiguous floodplain areas landward 200 feet from such floodways; and all wetland and river deltas associated with the streams and lakes which are subject to the provisions of the Shoreline Management Act. Shorelands in the City of Covington include areas within 200 feet of the ordinary high water mark of shoreline jurisdiction waters and associated wetlands within shoreline jurisdiction. Optional buffers for critical areas are not included in shoreline jurisdiction. Only portions of the floodplain are included in shoreline jurisdiction, including the mapped floodway of Big Soos Creek and contiguous floodplain areas landward 200 feet are also encompassed within the shoreland area. Some additional floodplain areas are included in the Jenkins Creek shoreline management area beyond the statutory minimum because they are located in wetland areas, which are included under mandatory provisions. Waters identified within the City’s shoreline jurisdiction include portions of Big Soos Creek, portions of Jenkins Creek, and the portion of Pipe Lake located within the City limits.

(753) “Shoreline buffer” means the area adjacent to a shoreline that separates and protects the water body from adverse impacts associated with adjacent land uses. It is designed and designated to remain vegetated in an undisturbed and natural condition to protect a water body from upland impacts. Shoreline buffers provide a transition between aquatic and allowed

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uses in upland areas. Uses within a shoreline buffer are typically limited to those that are water-dependent uses, provide ecological restoration, or provide public access. Shoreline buffers may be modified and reduced to accommodate allowed uses when consistent with the SMA and this master program, and when conducted so that no net loss of shoreline ecological functions occurs.

(764) "Shoreline environment designations" means the categories of shorelines established by local shoreline master programs in order to provide a uniform basis for applying policies and use regulations within distinctively different shoreline areas.

(775) "Shoreline jurisdiction" means all of the geographic areas covered by the SMA, related rules and the applicable master program, and such areas within a specified local government's authority under the SMA. Shorelands in the City of Covington include areas within 200 feet of the ordinary high water mark (OHWM) of shoreline jurisdiction waters, floodways, associated floodplain areas landward 200 feet from such floodways and associated wetlands. Waters identified within jurisdiction include portions of Big Soos Creek, portions of Jenkins Creek, and the portion of Pipe Lake located within the City limits. The mapped floodway of Big Soos Creek, contiguous floodplain areas landward 200 feet from such floodways, and associated wetlands are specifically encompassed within the shoreland area. Jenkins Creek does not have a mapped floodway, but floodplain areas within 200 feet of the OHWM and associated wetlands are included in shoreline jurisdiction. Within both Jenkins Creek and Big Soos Creek, additional floodplain areas beyond the statutory minimum are included because they are located in wetland areas. However, the entire floodplain is not included and wetland buffers are not included. See also "Shorelands," "Shorelines," "Shorelines of the State," "Shorelines of statewide significance," and "Associated wetlands."

(786) "Shoreline Management Act" or "Act" means Chapter 90.58 RCW, or as amended.

(797) "Shoreline stabilization" means actions taken to address erosion impacts to property and dwellings, businesses, or structures caused by natural processes, such as current, flood, tides, wind or wave action. These actions include structural and nonstructural methods. For the purposes of this SMP, new stabilization measures include enlargement of existing stabilization measures.

(8078) "Shorelines" means all of the water areas of the State, including reservoirs, and their associated shorelands, together with the lands underlying them; except (a) shorelines of statewide significance; and (b) shorelines on segments of streams upstream of a point where

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the mean annual flow is 20 cubic feet per second or less and the wetlands associated with such upstream segments; and (c) shorelines on lakes less than 20 acres in size and wetlands associated with such small lakes.

(~~8179~~) "Shorelines Hearings Board" means a State-level quasi-judicial body, created by the SMA, which hears appeals by any aggrieved party on the issuance of a shoreline permit, enforcement penalty and appeals by local government on Washington State Department of Ecology approval of master programs, rules, regulations, guidelines or designations under the SMA. See RCW 90.58.170; 90.58.180.

(~~829~~) "Shorelines of statewide significance" means a select category of shorelines of the State, defined in RCW 90.58.030(2)(e), where special preservationist policies apply and where greater planning authority is granted by the SMA. Permit review must acknowledge the use priorities for these areas established by the SMA. See RCW 90.58.020. Covington does not have any shorelines of statewide significance.

(~~834~~) "Shorelines of the State" means "shoreline jurisdiction," or the total of all "shorelines" and "shorelines of statewide significance" within the State.

(~~842~~) "Single-family residence" means a detached dwelling designed for and occupied by one family including those structures and developments within a contiguous ownership which are a normal appurtenance (WAC 173-27-040(2)(g)).

(~~853~~) "Stream" means a naturally occurring body of periodic or continuously flowing water where: (a) the mean annual flow is greater than 20 cubic feet per second and (b) the water is contained within a channel (WAC 173-22-030(8)).

(~~864~~) "Structure" means a permanent or temporary edifice or building, or any piece of work artificially built or composed of parts joined together in some definite manner, whether installed on, above or below the surface of the ground or water, except for vessels (WAC 173-27-030(15)).

(~~875~~) "Substantial development" means any development of which the total cost or fair market value exceeds that established by State law in RCW 90.58.030(3)(e), or any development which materially interferes with the normal public use of the water or shorelines of the State. The dollar threshold established in RCW 90.58.030(3)(e) must be adjusted for inflation by the office of financial management every five years, beginning July 1, 2007, based upon changes in the

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consumer price index during that time period. "Consumer price index" means, for any calendar year, that year's annual average consumer price index, Seattle, Washington area, for urban wage earners and clerical workers, all items, compiled by the Bureau of Labor and Statistics, United States Department of Labor. The Office of Financial Management must calculate the new dollar threshold and transmit it to the Office of the Code Reviser for publication in the Washington State Register at least one month before the new dollar threshold is to take effect. A list of activities and developments that shall not be considered substantial development is provided in RCW 90.58.030(3)(e); the City shall issue a letter of exemption for those developments that meet the precise terms of one or more of the listed exemptions.

(~~886~~) "Upland" means the dry land area above and landward of the ordinary high water mark.

(~~897~~) "Variance" or "shoreline variance" means an approval mechanism to grant relief from the specific bulk, dimensional or performance standards specified in the applicable master program. Variance permits must be specifically approved, approved with conditions, or denied by the Washington State Department of Ecology (see WAC 173-27-170).

(~~9088~~) "Water-dependent use" means a use or a portion of a use which cannot exist in any other location and is dependent on the water by reason of the intrinsic nature of its operations. Examples of water-dependent uses may include ship cargo terminal loading areas, ferry and passenger terminals, barge loading facilities, ship building and dry docking, marinas, aquaculture, float plane facilities and sewer outfalls.

(~~9189~~) "Water-enjoyment use" means a recreational use or other use that facilitates public access to the shoreline as a primary characteristic of the use; or a use that provides for recreational use or aesthetic enjoyment of the shoreline for a substantial number of people as a general characteristic of the use and which through location, design, and operation ensures the public's ability to enjoy the physical and aesthetic qualities of the shoreline. In order to qualify as a water-enjoyment use the use must be open to the general public and the shoreline-oriented space within the project must be devoted to the specific aspects of the use that fosters shoreline enjoyment.

(~~929~~) "Water-oriented use" means any combination of water-dependent, water-related, and/or water enjoyment uses, and along with single-family residences, serves as an all-encompassing definition for priority uses under the SMA. Non-water-oriented serves to describe those uses which have little or no relationship to the shoreline and are not considered priority uses under

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the SMA. Examples include professional offices, automobile sales or repair shops, mini-storage facilities, multifamily residential development, department stores and gas stations.

(9~~34~~) “Water-related use” means a use or a portion of a use which is not intrinsically dependent on a waterfront location but whose economic viability is dependent upon a waterfront location because:

- (a) A functional requirement for a waterfront location exists, such as the arrival or shipment of materials by water or the need for large quantities of water; or
- (b) The use provides a necessary service supportive of the water-dependent commercial activities and the proximity of the use to its customers makes its services less expensive and/or more convenient. Examples include manufacturers of ship parts large enough that transportation becomes a significant factor in the products’ cost, professional services serving primarily water-dependent activities and storage of water-transported foods. Examples of water-related uses may include warehousing of goods transported by water, seafood processing plants, hydroelectric generating plants, gravel storage when transported by barge, oil refineries where transport is by tanker and log storage.

(9~~42~~) “Water quality” means the physical characteristics of water within shoreline jurisdiction, including water quantity, hydrological, physical, chemical, aesthetic, recreation-related, and biological characteristics. Where used in this chapter, the term “water quantity” refers only to development and uses regulated under this chapter and affecting water quantity, such as impermeable surfaces and storm water handling practices. Water quantity, for purposes of this chapter, does not mean the withdrawal of ground water or diversion of surface water pursuant to RCW 90.03.250 through 90.03.340.

(9~~53~~) “Weir” means a low dam built across a stream to raise its level, divert its flow and/or measure its flow. Weirs have been used to address erosion and scouring of stream channels, but can also have negative impacts depending on how they are constructed, e.g., detrimental impacts on fish habitat conditions. (Ord. 09-19 § 6 (Exh. C))

Article IV. General Shoreline Regulations

16.05.230 Environmental protection and critical areas.

(1) *No Net Loss of Shoreline Ecological Functions.*

(a) No use, activity, or modification shall result in a net loss of shoreline ecological function. Impacts to ecological functions shall be avoided, minimized, and mitigated to achieve this standard.

(b) No permit shall be approved and no activity shall be authorized by the Shoreline Administrator without a clear finding that the use, activity, or modification, and any required mitigation, complies with the no net loss standard as set forth in subsection (1) of this section.

(c) The applicant and/or party responsible for the use, activity, or modification shall provide all necessary information needed to demonstrate compliance with the no net loss standard.

(d) The City shall periodically review shoreline conditions to determine whether or not other actions are necessary to ensure no net loss of ecological functions, protect and enhance visual quality, and enhance residential and recreational uses on the City's shoreline. Specific issues to address in such evaluations include, but are not limited to:

(i) Water quality;

(ii) Conservation of aquatic vegetation (control of noxious weeds and enhancement of vegetation that supports more desirable ecological and recreational conditions);

(iii) Changing visual character as a result of new residential development, including additions, and individual conservation practices (both along shorelines and in upland areas); and

(iv) Shoreline stabilization and modifications.

(2) *Critical Areas in Shoreline Jurisdiction.* The Covington Critical Areas Regulations, as codified in Chapter 18.65 CMC (Ordinance No. 09-19, dated July 9, 2019), are herein incorporated by

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reference into this master program, with the following exclusions, clarifications and modifications:

(a) *Exclusions.*

- (i) The reasonable use exception provisions (CMC 18.65.075) and the public agency/utility exception provisions (CMC 18.65.070) shall not apply in shoreline jurisdiction. Exceptions within shoreline jurisdiction shall require a shoreline variance based on the variance criteria listed in CMC 16.05.090 and WAC 173-27-170.
- (ii) The exemptions provisions (CMC 18.65.047) and partial exemptions provisions (CMC 18.65.048) shall not apply within shoreline jurisdictions. Exemptions are described in CMC 16.05.050.
- (iii) The allowed alteration provisions of the critical areas regulations (CMC 18.65.050) shall not apply in shoreline jurisdiction. Activities and alterations to critical areas, shorelines of the State, and their buffers shall be subject to the provisions of this master program, unless specified otherwise in this section.
- (iv) The stream buffer reduction provisions of CMC 18.65.360(3)(a) and (b) shall not apply in shoreline jurisdiction.

(b) *Clarifications and Modifications.*

- (i) Shoreline buffer widths are defined in CMC 16.05.280.
- (ii) Critical areas and buffers do not extend shoreline jurisdiction beyond the limits specified in this master program, except as provided for in CMC 16.05.040.
- (iii) Future amendments to the critical areas regulations (Chapter 18.65 CMC) require Department of Ecology approval of an amendment to this master program to incorporate updated language.
- (iv) If provisions of the critical areas regulations (Chapter 18.65 CMC) conflict with provisions of this master program, the provisions most protective of the ecological resource shall apply, as determined by the Administrator.

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(v) If there are provisions of the critical areas regulations (Chapter 18.65 CMC) that are not consistent with the Shoreline Management Act, Chapter 90.58 RCW, and supporting Washington Administrative Code chapters, those provisions shall not apply.

(vi) New publicly accessible non-motorized trails shall be allowed within the following critical areas and their buffers if the trail complies with the sequential steps for mitigation, including avoiding impacts, applicable development standards, mitigation requirements, and other applicable requirements as established in this chapter and CMC 18.65.050(8)(25):

(i) Wetlands;

(ii) Streams;

(iii) Geologically hazardous areas.

(3) *Mitigation Sequencing.* Where required, mitigation measures shall be applied in the following sequence of steps, listed in order of priority; lower priority measures shall be applied only where higher priority measures are determined to be infeasible or inapplicable:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action;
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation by using appropriate technology or by taking affirmative steps to avoid or reduce impacts;
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations;
- (e) Compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and
- (f) Monitoring the impact and the compensation projects and taking appropriate corrective measures.

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- (4) Solid waste, liquid waste, and untreated effluent shall not be allowed to enter any bodies of water or to be discharged onto the land.
- (5) The direct release of oil and hazardous materials or chemicals onto the land or into water is prohibited. Equipment for the transportation, storage, handling or application of such materials shall be maintained in a safe and leak-proof condition. If there is evidence of leakage, the further use of such equipment shall be suspended until the deficiency has been satisfactorily corrected.
- (6) All shoreline uses and activities shall utilize best management practices (BMPs) to minimize any increase in surface runoff and to control, treat and release surface water runoff so that receiving water quality and shore properties and features are not adversely affected. Physical control measures include, but are not limited to, catch basins, settling ponds, oil/water separators, filtration systems, grassy swales, interceptor drains and landscaped buffers. All types of BMPs require regular maintenance to continue to function as intended.
- (7) All shoreline developments and uses shall utilize effective erosion control methods during both construction and operation.
- (8) All shoreline uses and activity shall be located, designed, constructed and managed in a manner that avoids, if feasible, and then minimizes adverse impacts to surrounding land and water uses and that is aesthetically compatible with the affected area.
- (9) All shoreline developments shall be located, constructed and operated so as not to be a hazard to public health and safety.
- (10) Land clearing, grading, filling and alteration of natural drainage features and land forms shall be limited to the minimum necessary for development. Any allowed activity shall be consistent with Chapter 14.60 CMC and this master program. Surface drainage systems or substantial earth modifications involving greater than 500 cubic yards of material shall be designed by a professional engineer. These designs shall seek to prevent maintenance problems, avoid adverse impacts to adjacent properties or shoreline features, and result in no net loss of shoreline ecological functions.
- (11) All shoreline uses and activities shall be located and designed to prevent or minimize the need for shoreline protection structures (bulkheading, riprap, etc.) and stabilization, landfills, groins, jetties, or substantial site regrades.

(12) Identified significant short-term, long-term, or cumulative adverse environmental impacts lacking appropriate mitigation shall be sufficient reason for permit denial. (Ord. 09-19 § 6 (Exh. C))

Article V. Specific Shoreline Use Regulations

16.05.280 General shoreline use standards.

(1) *Permitted Uses.*

(a) Table 16.05.280-1 indicates which new, expanded, or altered shoreline uses may be allowed or prohibited in shoreline jurisdiction within each shoreline environment designation. Refer to the text in CMC 16.05.290 through 16.05.390 for provisions related to specific uses listed in the table. Uses are classified as follows:

(i) Uses allowed by shoreline substantial development permit or shoreline exemption are indicated by a "P" in the table.

(ii) Uses allowed by shoreline conditional use permit are indicated by a "C" in the table.

(iii) Prohibited uses are not allowed and are indicated by an "X" in the table.

(iv) Uses regulated consistent with the adjacent upland environment designation are indicated by "Upland" in the table.

(v) Uses not specifically identified in the table may be allowed by a shoreline conditional use permit.

(vi) If there are any conflicts between Table 16.05.280-1 and the written provisions in this master program, the written provisions shall control.

(b) Unless otherwise indicated in Table 16.05.280-1, the provisions of this section apply to primary uses, and accessory uses are regulated consistent with the primary use.

(c) *Additional Provisions for the Urban Conservancy Environment.* All new uses and developments, permitted or allowed as conditional, in the urban conservancy environment

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shall be compatible with conserving, protecting, and restoring ecological conditions of the shoreline. New uses and developments shall demonstrate consistency with the urban conservancy management policies as set forth in the Covington comprehensive plan.

Table 16.05.280-1. Permitted Uses by Shoreline Environment Designation

Shoreline Use	Shoreline Environment Designation				
	High-Intensity	Medium-Intensity	Shoreline Residential	Urban Conservancy	Aquatic
Agriculture	X	X	X	X	X
Aquaculture	P	P	C	P	Upland
Boating Facilities	X	X	C	C	Upland
Commercial Development					
Primary	P	P	X (1)	X	X
Accessory	P	P	P	C	X
Forest Practices	X	X	X	X	X
Industrial Development	P	X	X	X	X
Institutional Development (2)	P	P	P	P	P
In-Stream Structural Development					
As part of a fish enhancement project	P	P	P	P	P

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Shoreline Use	Shoreline Environment Designation				
	High-Intensity	Medium-Intensity	Shoreline Residential	Urban Conservancy	Aquatic
Other	C	C	C	C	C
Mining	X	X	X	X	X
Recreational Development					
Water-oriented	P	P	P	P	P
Non-water-oriented					
Primary	P	P	C	C	X
Accessory	P	P	P	P	X
Multi-use trails	P	P	C	C P	X
Minor trails	P	P	P	P	X
Residential Development					
Single-family	P	P	P	P/C/X (3)	X
Multifamily	P	P	X	X	X
Signs					
Primary	X	X	X	X	X

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Shoreline Use	Shoreline Environment Designation				
	High-Intensity	Medium-Intensity	Shoreline Residential	Urban Conservancy	Aquatic
Accessory	P	P	P	C	C
Transportation Facilities					
New circulation routes related to permitted shoreline use	C	C	C	C	C (4)
Expansion of existing circulation system	P	P	C	C	C (4)
Multi-use trails	P	P	C	€ P	C (4)
Parking					
Primary	X	X	X	X	X
Accessory	P	P	P	C	X
Utilities					
Major					
Solid waste disposal or transfer sites (excluding storage of recyclable materials)	X	X	X	X	X
Power generation, substations, and gas storage facilities	C	C	C	C	X

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Shoreline Use	Shoreline Environment Designation				
	High-Intensity	Medium-Intensity	Shoreline Residential	Urban Conservancy	Aquatic
All other	C	C	C	C	C
Minor	P	P	P	C	C
Uses Not Specified	C	C	C	C	C

Table Notes:

1 Commercial uses that are incidental to the primary residential use and are compatible with the residential character of the neighborhood, such as home occupations, may be permitted.

2 Institutional development shall include scientific, historical, cultural, or educational uses. The provisions for commercial development set forth in CMC 16.05.320 shall apply to institutional development.

3 Allowed as a permitted use (P) in the Jenkins Creek shoreline jurisdiction; as a conditional use (C) in the Big Soos Creek shoreline jurisdiction; and prohibited (X) in the Pipe Lake shoreline jurisdiction. All residential development shall be subject to the critical areas regulations set forth in CMC 16.05.230.

4 Bridges shall be allowed only in accordance with the provisions set forth in CMC 16.05.380, Transportation facilities, and all applicable shoreline modification regulations set forth in CMC 16.05.400 through 16.05.450.

(2) *Dimensional Standards.*

(a) Table 16.05.280-2 defines the dimensional standards applicable to all shoreline development within each shoreline environment designation. Dimensional standards include maximum height, shoreline buffers, building setbacks from the shoreline buffer, impervious surface coverage, and minimum lot width. All development shall also comply with all applicable dimensional standards, including interior and yard setbacks, pursuant to CMC Title 18. Where a conflict exists between a requirement of this master program and the zoning code, the most protective provision shall prevail.

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Table 16.05.280-2. Dimensional Standards

Dimensional Standard	Shoreline Environment Designation				
	High-Intensity	Medium-Intensity	Shoreline Residential	Urban Conservancy	Aquatic
Maximum Height	45 ft. (1)	45 ft. (1)	30 ft.	30 ft.	NA
Shoreline Buffer (2)	115 ft.	115 ft.	115 ft. (3)	115 ft.	NA
Building Setback from the Shoreline Buffer	15 ft.	15 ft.	15 ft.	15 ft.	NA
Impervious Surface Coverage	60%	50%	50%	10%	NA
Minimum Lot Width	60 ft.	60 ft. (4)	60 ft.	100 ft. (4)	NA

Table Notes:

1 A height of up to 45 feet may be approved if allowed in the underlying zoning and if the applicant can demonstrate the structure will not obstruct the view of a substantial number of residences and will serve the public interest. Otherwise height is limited to 35 feet.

2 Shoreline buffers may be modified subject to the critical areas provisions of CMC 16.05.230. Use and management of the buffer shall comply with all critical areas standards unless a provision would preclude a water-dependent use.

3 Shoreline buffers in the shoreline residential environment may be reduced pursuant to the provisions of subsection (2)(c) of this section.

4 Where the urban conservancy environment and the medium-intensity environment are parallel shoreline environments along Jenkins Creek, no minimum lot width shall be required for residential development, provided a conservation easement shall be required for all portions of lots within the urban conservancy designation; native vegetation shall be preserved within the easement; and joint consolidated access shall be provided within the easement.

(b) *Maximum Height.*

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(i) The maximum height set forth in Table 16.05.280-2 and the provisions of this subsection shall not apply to television antennas, chimneys, flagpoles, public utilities, and similar appurtenances.

(ii) In addition to compliance with the maximum height standard as set forth in Table 16.05.280-2, an applicant shall demonstrate that structures located below the ordinary high water mark are the minimum necessary to accommodate a water-dependent or other permitted use. Elevated decks, storage buildings, and other structures on docks are prohibited unless necessary for the operation of a water-dependent use, and no reasonable alternative exists.

(iii) A height of more than 35 feet may be approved only if the applicant prepares a view corridor study indicating that the proposed structure would not diminish views of the shoreline from surrounding properties.

(iv) Development shall also be subject to the height limits established by the underlying zoning, but in no case shall height exceed 45 feet above average grade level.

(v) Accessory structures, where allowed, shall not exceed a maximum height of 12 feet.

(c) *Shoreline Buffers.*

(i) The shoreline buffer shall be measured landward, on a horizontal plane perpendicular to the shoreline. The buffer shall be measured from the ordinary high water mark, unless a channel migration zone is found to occur and documented in a study submitted by a qualified professional, in which case the City may require that the shoreline buffer be measured from the edge of the channel migration zone.

(ii) Developments associated with water-dependent uses, ecological restoration, and public access shall not be subject to the requirement for a shoreline buffer. Mitigation sequencing shall be applied to ensure no net loss of shoreline ecological functions, consistent with CMC 16.05.230(3).

(iii) *Accessory Structures.* Accessory structures that are not water-dependent or water-related are prohibited within the shoreline buffer, except within the shoreline residential environment accessory structures may be allowed within the shoreline

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buffer if they are no closer than 10 feet from the OHWM, and less than or equal to 200 square feet in total area, and shall not exceed a maximum height of 12 feet. The area of shoreline buffer impacted shall be mitigated by planting native vegetation in an equivalent area elsewhere within in the shoreline buffer.

(iv) *Pipe Lake Buffer Reduction.*

(A) Within the shoreline residential environment only, the Shoreline Administrator may approve reduction of the standard buffer down to a minimum of 60 feet when a combination of the mitigation measures set forth in Table 16.05.280-3 is used to achieve an equal or greater protection of shoreline ecological functions, and subject to the provisions of this subsection.

Table 16.05.280-3. Shoreline Buffer Reduction Mechanisms

Reduction Mechanism		Reduction Allowance
Water-Related Actions (1)		
1	Removal of an existing bulkhead covering at least 75 percent of the shoreline frontage that is located at, below, or within 5 feet landward of the ordinary high water mark; and subsequent restoration of the shoreline to a natural or semi-natural state, including restoration of topography and beach/substrate composition.	30 ft.
2	Removal of an existing bulkhead covering at least 25 percent of the shoreline frontage that is located at, below, or within 5 feet landward of the ordinary high water mark; and subsequent restoration of the shoreline to a natural or semi-natural state, including	15 ft.

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Reduction Mechanism		Reduction Allowance
	restoration of topography, beach/substrate composition, and vegetation.	
3	Preservation of existing natural shoreline conditions (e.g., no bulkhead or other unnatural shoreline features such as upland impervious surfaces or other structural alterations) within 5 feet of the ordinary high water mark, including preservation of existing vegetation.	10 ft.
4	Preservation of existing trees and native vegetation and restoration of native vegetation as necessary in at least 75 percent of the remaining buffer area. Up to 25 percent of the buffer area can be composed of existing non-invasive, non-native vegetation. Up to 15 feet of the shoreline frontage (from the ordinary high water mark landward to the building setback line) may be permitted for improved shoreline access, provided access areas shall be located to avoid areas of greater sensitivity and habitat value. (2)	20 ft.
5	Preservation of existing trees and native vegetation and restoration of native vegetation in at least 25 percent of the remaining buffer area. Up to 15 feet of the shoreline frontage (from the ordinary high water mark landward to the building setback line) may be permitted for improved access, provided access areas shall be located to avoid areas of greater sensitivity and habitat value. (3)	10 ft.

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Reduction Mechanism		Reduction Allowance
Upland-Related Actions (4)		
6	Installation of biofiltration/infiltration mechanisms such as bioswales, created and/or enhanced wetlands, or ponds that exceed standard stormwater requirements.	15 ft.
7	Installation of a “green” roof in accordance with the standards of the LEED Green Building Rating System.	15 ft.
8	Installation of pervious material for driveway or road construction.	10 ft.
9	Limiting total impervious surface in the reduced buffer area to less than 5 percent.	10 ft.
10	Preserving or restoring at least 20 percent of the total lot area outside of the reduced buffer as native vegetation. No more than 20 percent of the total lot area can be lawn.	10 ft.

Table Notes:

- 1** At least one water-related action must be undertaken in order to achieve the full buffer reduction allowed.
- 2** This mitigation measure may not be used by any properties that currently have native vegetation in 75 percent or more of the remaining buffer area.
- 3** This mitigation measure may not be used by any properties that currently have native vegetation in 25 percent or more of the remaining buffer area.
- 4** A maximum of 35 feet in cumulative buffer reduction may be achieved using upland-related actions.

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(B) Buffer averaging as set forth in CMC 18.65.360(2) may be used in combination with the mitigation measures provided in Table 16.05.280-3; provided, that the buffer shall not be reduced to a width of less than 50 feet at any location. Further buffer reduction shall require approval of a shoreline variance.

(v) All property owners who obtain approval for a reduction in the buffer must record the final approved buffer and corresponding conditions in a notice on title, and provide a copy of the notice on title to the Shoreline Administrator.

(vi) All property owners who obtain approval for a reduction in the buffer must prepare, and agree to adhere to, a shoreline vegetation management plan prepared by a qualified professional and approved by the Shoreline Administrator that includes appropriate limitations on the use of fertilizer, herbicides, and pesticides as needed to protect lake water quality. This plan shall be recorded as a notice on title, and a copy of the final recorded notice on title provided to the Shoreline Administrator.

(vii) Restoration of native vegetation shall consist of a mixture of trees, shrubs, and groundcover and be designed to improve habitat functions. Preparation of a revegetation plan shall be completed by a qualified professional and include a monitoring and maintenance program that shall, at a minimum, include the following:

(A) The goals and objectives for the mitigation plan;

(B) The criteria for assessing the mitigation;

(C) A monitoring plan that includes annual progress reports submitted to the Shoreline Administrator and that lasts for a period sufficient to establish that performance standards have been met as determined by the Shoreline Administrator, but not less than five years; and

(D) A contingency plan.

(viii) Whenever the Shoreline Administrator determines that monitoring has established a significant adverse deviation from predicted impacts, or that mitigation or maintenance measures have failed, the applicant or the property owner shall be required to institute correction action, which shall also be subject to further monitoring as provided in this section.

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(ix) The Shoreline Administrator may require a financial guarantee in an amount sufficient to guarantee that all required mitigation measures will be completed in a manner that complies with conditions of approval and to guarantee satisfactory workmanship and materials for a period not to exceed five years. The Shoreline Administrator shall establish the conditions of the bond according to the nature of the proposed mitigation, maintenance or monitoring and the likelihood and expense of correcting mitigation or maintenance failures.

(x) All costs associated with the mitigation/monitoring and planning, including City expenses, shall be the responsibility of the applicant.

(xi) *Existing Structures.* Existing structures that are not considered to be nonconforming and located within the shoreline buffer may be replaced in their current location and configuration to the extent allowed by local, State, and Federal agencies with jurisdiction.

(d) *Building Setbacks.* Structures allowed within the shoreline buffer under subsection (2)(c) of this section shall also be allowed within the building setback from the shoreline buffer unless otherwise prohibited by Chapter 18.65 CMC.

(e) *Impervious Surface Coverage.*

(i) The amount of impervious surface shall be the minimum necessary to provide for the proposed use.

(ii) Impervious surface coverage is further restricted in critical areas, critical area buffers, and shoreline buffers pursuant to the critical areas regulations set forth in CMC 16.05.230.

(iii) Outside of critical areas, critical area buffers, and shoreline buffers, a credit towards the total impervious surface coverage may be provided through the use of permeable materials, such as pervious concrete, subject to approval by the Shoreline Administrator in consultation with the Development Review Engineer pursuant to Chapter 13.25 CMC. Within the urban conservancy environment, this credit shall be limited to a maximum of 20 percent of the site area. The City will encourage practices that further minimize impervious surfaces and stormwater runoff, including use of best available technologies. (Ord. 09-19 § 6 (Exh. C))

16.05.350 Recreational development.

Recreational uses include passive activities, such as walking, viewing and fishing. Recreational development also includes facilities for active-water-oriented and non-water-oriented uses, such as swimming, boating, and other outdoor recreation uses. Structures for water enjoyment uses shall be tied to a master plan or other larger public planning effort. Recreational facilities are not intended for a private residence, but as private or public shoreline recreational facilities.

- (1) *Applicability.* This section shall apply to both public and private shoreline recreational facilities, excluding private residences. Commercial recreational development shall be subject to the provisions of CMC 16.05.320, Commercial development.
- (2) Proposals for new or expanded recreational development shall include provisions for public access to the shoreline. Public access sites shall comply with the requirements of CMC 16.05.240(3). New or expanded recreational development that does not provide public access may be authorized provided the applicant demonstrates compliance with CMC 16.05.240.
- (3) Recreational developments, uses, and activities shall be designed and operated to avoid blocking, reducing, or adversely interfering with the public's visual or physical access to the water and the shorelines. In providing visual access to the shoreline, the natural vegetation shall not be excessively removed either by clearing or by topping.
- (4) All new structures associated with a recreational development, other than accessory or water-dependent structures such as docks and boardwalks that provide access to the water for that development, shall maintain the required shoreline buffer and building setback as set forth in CMC 16.05.280. Existing structures may be replaced in their existing location and configuration to the extent allowed by local, State, and Federal agencies with jurisdiction. Shoreline buffer reduction beyond that allowed under CMC 16.05.280 shall require a shoreline variance.
- (5) Recreational development shall be located, designed, and constructed to result in no net loss of shoreline ecological functions, including protection of existing native shoreline vegetation and restoration of native shoreline vegetation impacted by development activities. Mitigation shall be provided as necessary to meet this requirement. The City may request studies by qualified professionals to determine compliance with this requirement.

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- (6) Water-dependent or water-related activities such as swimming, boating, and fishing, and activities that benefit from waterfront scenery such as picnicking, hiking, and bicycling, shall be given priority in planning public and private recreational development in shoreline jurisdiction.
- (7) Recreational development shall make adequate provisions for, as applicable:
 - (a) Motorized, nonmotorized, and pedestrian access;
 - (b) The prevention of trespass onto adjacent properties, using mechanisms including but not limited to landscaping and fencing;
 - (c) Protection and restoration of critical areas and shoreline processes and functions;
 - (d) Signs indicating the public's right of access to shoreline acres, installed and maintained in conspicuous locations at the point of access and entrance; and
 - (e) Buffering of such development from adjacent private property or natural areas.
- (8) In approving recreational development, the City shall ensure that the development will maintain, enhance, or restore desirable shoreline features.
- (9) Swimming areas shall be separated from boat launch areas.
- (10) The construction of swimming facilities, piers, moorages, floats, and launching facilities waterward of the ordinary high water mark shall also be subject to the provisions for overwater structures as set forth in CMC 16.05.440.
- (11) Public boat launching facilities may be permitted provided the traffic generated by such facilities can be safely and conveniently handled by the streets serving the proposed facility.
- (12) Fragile and unique shoreline areas with valuable ecological functions, such as wetlands and wildlife habitats, shall be used only for non-intensive recreation activities that do not involve the construction of structures.
- (13) Recreational developments that require periodic use of fertilizers, pesticides, and other chemicals, such as golf courses and playfields, or that support high-intensity activities such as sporting events as a primary use, shall be located outside of shoreline jurisdiction.
- (14) *Trails.*

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(a) Trails shall be designed to avoid significant impacts to sensitive natural systems and shall result in no net loss of ecological functions. Mitigation sequencing as set forth in CMC 16.05.230(3) shall be required.

(b) ~~Trails shall be located at least 80 feet from the ordinary high water mark, except in limited areas to provide viewpoints or conform to topography.~~ Publicly accessible trails shall meet the applicable provisions of CMC 16.05.240.

(c) Trails not intended for public access shall be limited to non-motorized, pervious trails, including boardwalks, no greater than six feet wide. Trails not meeting these criteria shall be considered multi-use, and shall require a conditional use permit in the shoreline residential ~~and urban conservancy~~ environments.

(15) Whenever financially feasible and practical, the City shall require the use of building materials and technologies whose production and use result in reduced environmental impacts when developing public access to the shoreline. Porous pavements shall be used unless the applicant demonstrates to the satisfaction of the Shoreline Administrator that such materials would restrict accessibility, pose a safety hazard, or are not sufficiently durable. (Ord. 09-19 § 6 (Exh. C))

TECHNICAL MEMORANDUM

Meeting Date:	April 17, 2025
Department:	Community Development
Staff Lead:	Dafne Hernandez, Associate Planner
From	Alex Capron, AICP, Senior Planner - Facet
Attachments:	SMP Amendments

SHORELINE MASTER PROGRAM – LIMITED AMENDMENT TO IMPLEMENT CITY PROS PLAN

Background

The City's Shoreline Master Program (SMP) found within Covington Municipal Code (CMC) Chapter 16.05 regulates uses within and in-proximity to shorelines of the state. The SMP is jointly adopted by State Department of Ecology (DOE) and each city with shorelines of the state. Therefore, the DOE must review and approve the City's amendments to its SMP. The City of Covington has the following shorelines that fall under SMP jurisdiction: Big Soos Creek, Jenkins Creek, and Pipe Lake.

The SMP applies to both public and private uses within the jurisdiction of Washington's Shorelines of the State to protect natural resources for future generations, provide for public access to public waters and shores, and plan for water-dependent uses.

Specific to water-oriented uses where users may view shorelines as part of passive recreation, the City's recently-adopted Parks, Recreation and Open Space plan and Jenkins Creek Park Master Plan have identified potential non-motorized trail opportunities where the current SMP regulations hinder trail alignments within the Urban Conservancy Shoreline Environment Designation. While the CMC 16.05 provides a framework for trail development, there are identified gaps, limitations, and inconsistencies that could hinder the effective implementation of the Jenkins Creek Trail Master Plan and the City's PROS Plan, including:

- Areas within 100 feet of Jenkins Creek are designated as Urban Conservancy, requiring a Shoreline Conditional Use Permit for new trails in the Urban Conservancy environment.
- CMC 16.05.350.14 requires that trails be located at least 80 feet from the OHWM of Jenkins Creek, except where necessary to allow for viewpoints or to conform to site topography. Any deviation from this standard requires a Shoreline Variance.
- Activities within critical areas and critical area buffers, including wetlands and geologically hazardous areas, within shoreline jurisdiction must comply with the specific critical area provisions found in CMC 16.05.230. Notably, these shoreline-specific critical area provisions do not include an allowance for the placement of new trails within wetland, streams, and

geologically hazardous areas (including their buffers). Thus, a Shoreline Variance would likely be necessary to place a new trail within critical areas, or buffers, within areas of shoreline jurisdiction, subsequently requiring a demonstration that a denial of the project would significantly interfere with reasonable use of the property, and formal review and approval by DOE.

Proposed amendments aim to address specific challenges identified in the current code and to provide greater flexibility for the development of trails within critical areas and shoreline jurisdiction, consistent with water oriented uses, so long as this development ensures a no net loss of shoreline ecological function. To ensure that future trail development aligns with the vision set forth in these publicly vetted and adopted master plans and is not unduly constrained by existing regulatory requirements, the following code revisions are recommended (and numbered within Chapter 16.05, CMC Shoreline Master Program as sidebar comments):

1. Add Minor Trail definition to clarify type of use allowed.
2. Include a provision in CMC 16.05.230 for the construction of a 'new publicly accessible nonmotorized trail' within wetlands, stream, and geologically hazardous areas (including their buffers) – similar to what is currently found in CMC 18.65.050.8.25.
3. Revise Table 16.05.280-1 to authorize multi-use trails as a permitted activity (SSDP) within the Urban Conservancy environment, consistent with water oriented use and adopted City PROS plan.
4. Emphasize water-oriented uses as a form of recreational development, as supported by other public access master planning efforts in-line with the Shoreline Management Act emphasis for providing public access to the shoreline
5. Revise CMC 16.05.350.14 to remove restrictions on the placement of public non-motorized trails within vicinity of Type S waterbodies.

Public Review Process

The following public review process is anticipated, as part of this limited amendment to the SMP:

<i>April 17, 2025:</i>	Presented an overview of the SMP updates to the Planning Commission.
<i>Mid May, 2025:</i>	Begin 30-day joint public comment period with Department of Ecology (DOE)
<i>June 6, 2025:</i>	Public Hearing/Joint Session with DOE.
<i>End of June:</i>	Respond to Public Comments, transmit to DOE
<i>August:</i>	Receive Ecology's Initial Determination of Consistency
<i>September 23, 2025:</i>	Adoption by City Council.

Timing and Next Steps

Incorporate any edits resulting from the Study Session, then return the Shoreline Master Program to Planning Commission for Public Testimony as part of their June 6th Public Hearing.