Lakepointe Urban Village Subarea 2018 Development Increase Proposal

Final Supplemental Environmental Impact Statement

May 2021

May 28, 2021

Subject: Lakepointe Urban Village Subarea 2018 Development Increase Proposal (Lakepointe 2018 Proposal) Final Supplemental Environmental Impact Statement

Dear Reader:

The Lakepointe Urban Village Subarea site is 214.10 acres and fronts along SR 18 at the eastern end of the city limits. In 2013, the City of Covington approved a subarea plan and planned action ordinance for 1,500 dwelling units and 850,000 square feet of commercial space as part of a mixed use planned development with a pond, trails, open space, and spine road connecting the eastern part of the city.

The Lakepointe Urban Village Subarea 2018 Development Increase Proposal (Lakepointe 2018 Proposal) would amend various sections of the Comprehensive Plan to increase the maximum number of dwelling units and commercial square footage thresholds allowed within the Lakepointe Urban Village Subarea (e.g. allow up to 1,750 dwelling units and 1.32 million square feet of commercial development). This is an increase of 250 dwelling units and 470,000 square feet of commercial space above the 2013 EIS Maximum Village Alternative 3, which is now considered the "No Action" Alternative.

The City is considering the Lakepointe 2018 Proposal as part of its Comprehensive Plan docket, and considering environmental effects under the State Environmental Policy Act (SEPA) through this Final Supplemental EIS.

SEPA allows use of prior environmental documents to meet all or part of the City's responsibility under SEPA (WAC 197-11-600). This Supplemental EIS adopts and supplements the following:

- Hawk Property Subarea Plan and Planned Action Final EIS, July 26, 2013
- Lakepointe Urban Village Development Agreement, Zoning Map Amendment, Boundary Line Adjustment, SEPA Addendum, March 24, 2017
- Lakepointe Addendum (SEPA17-02) April 11, 2017, Addressing Noise

This Supplemental EIS is focused on elements of the environment that could change as a result of the Lakepointe 2018 Proposal. This Supplemental EIS evaluates: Earth and Groundwater, Air Quality, Plants and Animals, Land Use Patterns/Plans and Policies, Transportation, Noise, Public Services, and Utilities. The footprint or extent of development is not changing, and thus subjects that are dependent on the extent of development are not readdressed unless conditions have changed since 2013.

The Final SEIS completes the Draft SEIS issued in February 2021 and responds to public and agency comments made following a 30-day comment period. The Final SEIS does not repeat all of the analysis found in the Draft SEIS and both should be read together.

The Final SEIS is being made available to City decision makers prior to their decision consistent with WAC 197-11-460.

The Final SEIS, along with the Draft SEIS that it completes, is posted on the City's website at: https://www.covingtonwa.gov/lakepointe/.

A reference copy of the Final SEIS for review is also available at City Hall, Monday through Friday from 8am-12pm (noon) closed holidays at the following address: Covington City Hall, 16720 SE 271st Street, Covington, WA 98042.

If you have questions, you may contact:

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Thank you for your interest in the proposal and Covington.

Sincerely,

Gina Estep

Gina Estep, Community Development Director, SEPA Responsible Official

Fact Sheet

Project Title

Lakepointe Urban Village Subarea 2018 Development Increase Proposal (Lakepointe 2018 Proposal) Supplemental Environmental Impact Statement (SEIS)

Proposed Action and Alternatives

The Lakepointe Urban Village Subarea 2018 Development Increase Proposal (Lakepointe 2018 Proposal) would amend various sections of the Comprehensive Plan to increase the maximum number of dwelling units and commercial square footage thresholds allowed within the Lakepointe Urban Village Subarea (e.g. allow up to 1,750 dwelling units and 1.32 million square feet of commercial development). This is an increase of 250 dwelling units and 470,000 square feet of commercial space above the 2013 EIS Maximum Village Alternative 3, which is now considered the "No Action" Alternative.

Location

The Lakepointe Urban Village Subarea site is 214.10 acres and fronts along SR 18 at the northeastern edge of the city limits.

Proponent

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Lead Agency

City of Covington

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Licenses or Permits Required

The Lakepointe 2018 Proposal would require legislative amendments (LA) to the Comprehensive Plan to account for the increased growth, which would trigger necessary amendments to the Development Agreement (Ordinance 02-2017, "2017 Development Agreement"), and State Environmental Policy Act (SEPA) Planned Action Ordinance (Ordinance 04-14, "the Planned Action Ordinance"), as they list total allowable growth. These ordinances may be amended concurrently to address the new level of land use, public benefits, and to reference updated mitigation measures if needed. The City's permit file numbers are LA18-0002 and SEPA 18-09.

The Planning Commission reviewed and made a recommendation regarding the amendments to the Comprehensive Plan and SEPA Planned Action Ordinance to the City Council. The City Council will deliberate and make the final decision. Pursuant to the applicant's request, amendments to the Development Agreement (Ord. 02-2017), will be pursued separately at a later date. The effective date for some of the mitigation described in the SEPA Planned Action Ordinance amendment will be tied to the date of the later Development Agreement amendment.

The City provided the amendments to the State of Washington Department of Commerce and Puget Sound Regional Council (PSRC) consistent with the Growth Management Act.

Adoption of Prior SEPA Documents

This Supplemental EIS adopts and supplements the following:

- Hawk Property Subarea Plan and Planned Action Final EIS, July 26, 2013
- Lakepointe Urban Village Development Agreement, Zoning Map Amendment, Boundary Line Adjustment, SEPA Addendum, March 24, 2017
- Lakepointe Addendum (SEPA17-02) April 11, 2017, Addressing Noise

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Final SEIS Date of Issuance

May 28, 2021

Draft SEIS Date of Issuance

February 2, 2021

Draft SEIS Review

The City established a 30-day public and agency comment period for the Draft SEIS extending from February 2, 2021 to March 4, 2021. A virtual online community meeting was held during the comment period on February 18, 2021 consistent with RCW 43.21C.440 (3)(b). Responses to written and public meeting comments are provided in this Final SEIS.

Tentative Date of Lead Agency Action

June 8, 2021

Location of Background Data

Background Data has been posted on the project website www.covingtonwa.gov/lakepointe.

Availability of Final SEIS

This Final Supplemental EIS is posted at the City's website at: https://www.covingtonwa.gov/lakepointe/.

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1.0 Summary

This Final Supplemental Environmental Impact Statement (Final SEIS) evaluates the Lakepointe Urban Village Subarea 2018 Development Increase Proposal (Lakepointe 2018 Proposal).

The Lakepointe 2018 Proposal would amend various sections of the Comprehensive Plan to increase the maximum dwelling units and commercial square footage thresholds allowed within the Lakepointe Urban Village Subarea (e.g. allow up to 1,750 housing units and 1.32 million square feet of commercial development). This is an increase of 250 dwellings and 470,000 square feet of commercial space above the 2013 EIS Maximum Village Alternative 3, which is now considered the "No Action" Alternative.

The City issued a Draft SEIS in February 2021 with a 30-day comment period. The Draft SEIS evaluated the two alternatives regarding Earth and Groundwater, Air Quality, Plants and Animals, Land Use Patterns/Plans and Policies, Transportation, Noise, Public Services, and Utilities. Comments during the 30-day comment period are addressed in this Final SEIS.

Following the comment period, the Planning Commission held a public hearing and deliberation regarding the Lakepointe 2018 Proposal. There were no substantive changes to the Lakepointe 2018 Proposal, and it is carried forward in this Final SEIS.

The Final SEIS completes the Draft SEIS. This Final SEIS is structured as follows:

- 1.0 Summary
- 2.0 Comments and Responses
- 3.0 Clarifications and Corrections
- 4.0 References
- Appendices

Chapter 1 provides a summary of the SEIS, and Chapter 2 provides a summary of public comments and responses. The Final SEIS does not repeat all of the analysis found in the Draft SEIS and both should be read together. For more details about the proposals and alternatives and environmental analysis, readers are encouraged to review the full context of the analysis in Draft SEIS Chapters 2 and 3.

1.1. PURPOSE OF PROPOSED ACTION

The Lakepointe Urban Village Subarea site is 214.10 acres and fronts along SR 18 at the eastern end of the city limits.

In 2013, the City of Covington approved a subarea plan and planned action ordinance for 1,500 dwelling units and 850,000 square feet of commercial space as part of a mixed use planned development with a pond, trails, open space, and spine road connecting the eastern part of the city.

The Lakepointe 2018 Proposal would amend various sections of the Comprehensive Plan to increase the housing and commercial square footage thresholds allowed within the Lakepointe Urban Village Subarea (e.g. allow 1,750 housing units and 1.32 million square feet of commercial development). This is an increase of 250 dwellings, 470,000 square feet of commercial space, and about 1,011 more jobs above the 2013 EIS Maximum Village Alternative 3, which is now considered the "No Action" Alternative.

The City is considering the Lakepointe 2018 Proposal Alternative as part of its Comprehensive Plan docket, and considering environmental effects under the State Environmental Policy Act (SEPA) through this Supplemental EIS.

1.2. STATE ENVIRONMENTAL POLICY ACT PROCESS

1.2.1. Purpose of SEPA

This SEIS provides a qualitative and quantitative analysis of environmental impacts associated with the Lakepointe 2018 Proposal Alternative and associated policy and development regulation amendments. This SEIS assists the public and local government decision makers in considering future growth, infrastructure, and mitigation measures appropriate for the proposal.

SEPA allows use of prior environmental documents to meet all or part of the City's responsibility under SEPA. (WAC 197-11-600).

This Supplemental EIS adopts and supplements the following:

- Hawk Property Subarea Plan and Planned Action Final EIS, (SEPA13-01), July 26, 2013
- Lakepointe Urban Village Development Agreement, Zoning Map Amendment, Boundary Line Adjustment, SEPA Addendum, (SEPA17-01), March 24, 2017
- Lakepointe Addendum (SEPA17-02) April 11, 2017, Addressing Noise

1.2.2. Related Environmental Analysis

This SEIS is focused on elements of the environment that could change as a result of the Lakepointe 2018 Proposal. The footprint or extent of development is not changing, and thus subjects that are dependent on the extent of development are not readdressed; rather the 2013 Planned Action EIS should be consulted. Where the proposal is changing such as with building form and land use mix, relevant environmental topics are addressed in this Supplemental EIS. Also, where conditions have changed since 2013, topics are addressed. In Chapter 3 of the Draft SEIS, topics evaluated and summarized in this Chapter 1 Summary include:

- Earth and Groundwater
- Air Quality
- Plants and Animals
- Land Use Patterns/Plans and Policies
- Transportation
- Noise
- Public Services
- Utilities: Sewer and Water

1.3. PUBLIC INVOLVEMENT

The City posted information about the Lakepointe 2018 Proposal on the city website www.covingtonwa.gov/lakepointe, at city hall, published a legal notice in Covington Reporter, held a public hearing on May 8, 2018 to establish the City of Covington's 2018 docket for evaluation, and the City and applicant hosted a neighborhood meeting on November 14, 2018 as a voluntary outreach measure.

On February 2, 2021, the Draft SEIS was issued with a 30-day comment period that ended on March 4, 2021. An online virtual community meeting was held on February 18, 2021 with over 80 attendees logging on This Final SEIS responds to comments received. The City Council will review the SEIS in considering the amendments in the Lakepointe 2018 Proposal.

1.4. PROPOSED ACTION, ALTERNATIVES, AND OBJECTIVES

1.4.1. Objectives

SEPA requires an objectives statement that addresses the purpose and need for the proposal and around which reasonable alternatives can be evaluated. The Subarea Plan vision statement is an objective for the purposes of this SEIS:

> *The vision for the Hawk Property* [Lakepointe Urban Village] *Subarea is the creation of an Urban Village at Covington's northern gateway that provides a mix of commercial development focused on regional uses and a variety of housing types. This village would provide regional shopping and employment opportunities for residents of both Covington and neighboring communities, as well as new housing opportunities for the Covington community. In addition to commercial and residential development, the village would offer public recreational amenities, such as parks, natural open space, a pond, and bicycle and pedestrian trails that link to the regional trail system. The Hawk Property Subarea* [Lakepointe Urban Village Subarea], *while providing both economic and lifestyle benefits would be a secondary center within Covington, providing an experience that is distinct from Covington's town center, not competing with it.*

1.4.2. SEIS Alternatives and Relationship to Prior 2013 EIS

In November 2013, the City issued the Hawk Property Planned Action Final EIS (2013 Final EIS) and adopted a Subarea Plan addressing the transformation of a 214.10-acre mine site to a mixed use commercial residential development now called the Lakepointe Urban Village Subarea (Lakepointe Subarea). The 2013 proposal resulted in a subarea plan, a future land use map amendment, and text amendments to the comprehensive plan and development regulations. A range of alternatives were studied, including maintaining the site as a mine with prior mineral lands zoning or allowing mixed use development of up to 850,000 square feet of commercial space and up to 1,500 dwelling units. The City considered a range of development up to the maximum of Alternative 3 in the 2013 Final EIS. The Alternative 3 Conceptual Land Use Plan, representing the 2013 Final EIS Maximum Village Alternative, is illustrated in Exhibit 1.4-1 below.

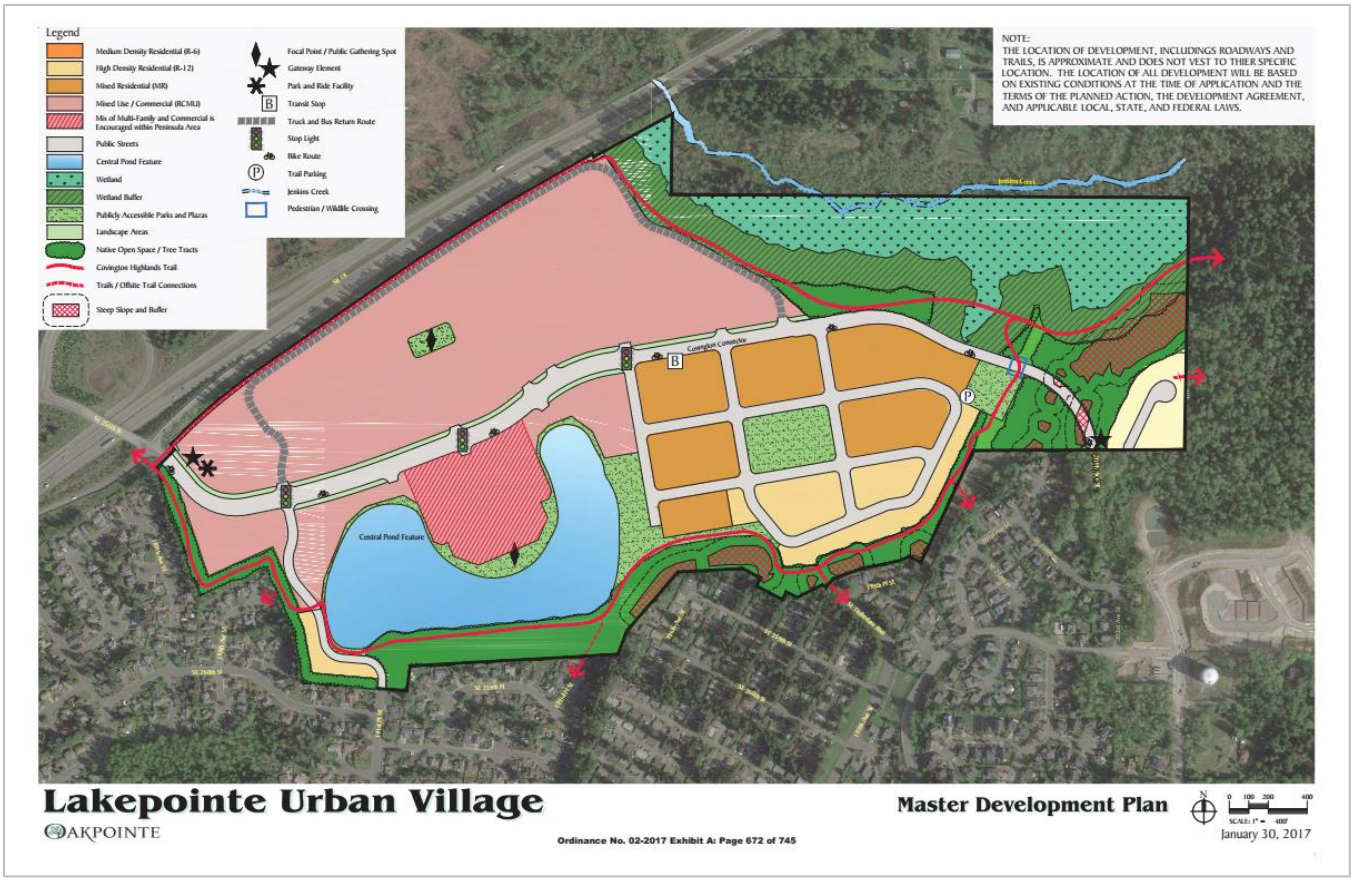
Exhibit 1.4-1. Alternative 3 Conceptual Land Use Plan



Source: Communita, 2013.

In April 2017, the City Council adopted the 2017 Development Agreement along with a zoning map amendment and boundary line adjustment for the Lakepointe Subarea providing for a modified location and mix of uses but the same level of commercial growth and the same total residential units as studied for the maximum future development within the Lakepointe Urban Village Subarea (Alternative 3) in the 2013 Final EIS, with some differences in the type of dwelling unit mix. A Determination of Significance and Notice of Adoption with an Addendum were prepared, documenting that the different housing mix could reduce trip generation, and otherwise the extent and area of the development were similar. The 2017 Development Agreement Master Development Plan is illustrated in Exhibit 1.4-2 below.

Exhibit 1.4-2. Lakepointe Development Agreement Master Development Plan



Source: Lakepointe Development Agreement, Ordinance 02-2017.

In 2018, Lakepointe Covington, Inc. (aka Oakpointe), the master developer, submitted a Comprehensive Plan docket application LA18-0002 ("Docket Application"), which was authorized for evaluation in May 2018 by the City Council. The application would amend various sections of the Comprehensive Plan to increase the housing and commercial square footage thresholds allowed within the Lakepointe Urban Village Subarea (e.g. allow 1,750 housing units and 1.32 million square feet of commercial development). Parking, potentially including structured parking garages to serve these uses will also be provided. Parking garages and structures do not count against the housing unit or commercial square footage limits; parking structures need to meet applicable standards.

The City determined a SEIS to be the appropriate document to evaluate the environmental impacts of the Docket Application that is included in the Lakepointe 2018 Proposal. This SEIS compares the Lakepointe 2018 Proposal to the 2013 Final EIS Alternative 3. Alternative 3 is considered the "No Action" Alternative in the SEIS. A No Action Alternative is required under SEPA and represents the amount of change and development could occur under the current Comprehensive Plan and development regulations. The Lakepointe 2018 Proposal is the Action Alternative evaluated in this SEIS and compared to the No Action Alternative.

The Lakepointe 2018 Proposal Alternative proposes a new total number of 1,750 housing units and commercial square footage totaling 1,320,000 SF. The transportation analysis for the Lakepointe 2018 Proposal Alternative specified hypothetical land uses in greater detail than the No Action Alternative, breaking down possible uses into different types of housing units and different types of commercial

development (referenced as Lakepointe 2018 Proposal: Hypothetical Itemized Land Use). The purpose of the hypothetical land uses in the transportation analysis was only to demonstrate that there is an available mix of uses within the Lakepointe 2018 Proposal Alternative, which, at full build out, generates the same or fewer total traffic trips than the primary (new) PM peak hour vehicle trips associated with the 2013 No Action Alternative. As the Lakepointe Urban Village is constructed over time, development types and amounts different than the Hypothetical Itemized Land Uses are expected to be proposed. Development applications would be reviewed and approved by the City consistent with the terms of the Planned Action Ordinance, and so long as the total build-out is less than the maximum amount of development proposed (i.e., 1,750 residential dwellings and 1,320,000 commercial square feet), concurrency requirements are met, and the Trip Ceiling of 2,578 primary (new) PM peak hour vehicle trips (described in Section 3.5) is not exceeded. That is, as development applications are received by the City over time, they will be reviewed using the process shown in the Planned Action Ordinance. The project will build out incrementally, such that it is expected all earlier implementing project impacts will be fully addressed by the analysis in this SEIS and related SEPA documents. As to transportation impacts from the earlier projects, and the need to meet concurrency requirements, earlier projects generating vehicle trips up to 97% of the Trip Ceiling (2,493 PM peak hour trips) are deemed to have met concurrency with the information provided in 2013 EIS so long as the City concurs with the applicant's assessment of trip generation. Subsequent projects generating the final 3% of vehicle trips may be subject to full concurrency tests and review, which may require additional transportation mitigation. The Planned Action Ordinance provides a process for the City to determine that a specific implementing project falls inside the completed SEPA analysis and steps to ensure adequate information and review if a later phase could fall outside of the analysis.

Exhibit 1.4-3. Comparison of 2013 Final Planned Action EIS & Lakepointe 2018 Proposal Alternatives[1]

Use Type	No Action Alternative (2013 Alternative 3)	Lakepointe 2018 Proposal: Hypothetical Itemized Land Use2	Lakepointe 2018 Proposal Alternative Not Itemized
Single Family Detached (dwelling units)	200	22	
Townhomes (dwelling units)	400		
Multi-family Apartments (dwelling units)	900	1,728	
Low-Rise (Townhomes)		778	
Mid-Rise (Apartments)		950	
Residential Total (dwelling units)	1,500	1,750	1,750
Large format Retail (square feet)	708,940	See below	
Iconic/Local Retail (square feet)	141,060	See below	

Use Type	No Action Alternative (2013 Alternative 3)	Lakepointe 2018 Proposal: Hypothetical Itemized Land Use2	Lakepointe 2018 Proposal Alternative Not Itemized
Commercial Space			1,320,000 sf
Retail		600,000 sf	
Restaurant		176,000 sf	
Hotel		150,000 sf (250 rooms)	
Assisted Living		135,000 sf (150 beds)	
Office		132,000 sf	
Cinema		55,000 sf (1,200 seats)	
Grocery Store		50,000 sf	
Fast Casual Restaurant		22,000 sf	
Commercial Retail Total (square feet)	**850,000**	**1,320,000 sf**	**1,320,000**
Park and Ride Facility	125 spaces	325 spaces[1]	325 spaces[1]

Source: Communita, Stalzer and Associates, 2013; Transpo 2018; Heffron 2018; Oakpointe 2018.

1. The Lakepointe 2018 Proposal Alternative transportation analysis specified 325 spaces for purposes of traffic analysis only. As the Lakepointe Urban Village is constructed over time, the number of spaces included within the Park and Ride Facility may differ so long as the total build-out is less than the Trip Ceiling, and consistent with the Air Quality evaluation and results of the SEIS.

2. As the Lakepointe 2018 Proposal Alternative is constructed over time, the development types and amounts may vary from those in this table. The development types and amounts will be evaluated at the time of application to ensure they satisfy applicable City codes and ordinances, including the Planned Action Ordinance, and to ensure they are within the total build-out amount (i.e., 1,750 residential dwelling units and 1,320,000 commercial square feet), and the Trip Ceiling (described in Section 3.5) is not exceeded.

As development applications are received by the City over time, they will be reviewed using the Planned Action Ordinance as well as the Development Agreement and other applicable regulations. In the future, the mix and type of land uses may change from those identified in the Hypothetical Itemized Land Use addressed in this SEIS, and will be evaluated at the time of application to ensure they satisfy applicable City codes and ordinances and in order to determine that the Planned Action Projects do not create additional impacts not evaluated in this SEIS and related prior SEPA documents.

For example, the mix of dwelling units may shift to include more single-family units or townhomes and less apartments than the Hypothetical Itemized Land Use evaluated in this SEIS, provided that the total dwellings do not exceed the proposed development threshold of 1,750, and the residential development is compatible with the overall development master plan in Exhibit 1.4-2, and fits within the traffic trip ceiling. The type of commercial uses may also shift, such as to more restaurant and office and less retail, or to more office space and less entertainment space, but the use types must be within the range of allowed uses in applicable zoning regulations and the uses examined in the SEIS and Planned Action Ordinance (e.g. commercial). The commercial uses must also be designed consistent with the development master plan in Exhibit 1.4-2. The total space must not exceed the proposed 1.32 million square feet, and

the uses must not result in an exceedance of the Trip Ceiling. In all cases, the mitigation measures are integrated into the Planned Action Projects.

A public hearing was held on April 1, 2021, by the Planning Commission, at the conclusion of the public hearing they recommended approval of the proposed Comprehensive Plan Amendments and the proposed amendments to the Planned Action Ordinance based on the Lakepointe 2018 Proposal Alternative. The City Council will hold a public hearing to consider the Planning Commission's recommendations and make a final determination on the Lakepointe 2018 Proposal.

1.5. MAJOR ISSUES, SIGNIFICANT AREAS OF CONTROVERSY AND UNCERTAINTY, AND ISSUES TO BE RESOLVED

Majors issues associated with the proposal include further intensification of commercial and residential land uses, including commercial and multifamily uses, as well as the associated increases in air quality GHG emissions and increased demand in public services and utilities. However, the intensification within the same master plan area footprint is not anticipated to change the amount of impervious area, nor change the protection of critical areas. Transportation trips are also anticipated to be similar to the 2013 EIS. Issues to be resolved include amendment of the Comprehensive Plan and Planned Action Ordinance and eventually the Development Agreement for consistency.

1.6. SUMMARY OF IMPACTS AND MITIGATION MEASURES

This section summarize the evaluation of the alternatives in Chapter 3.

1.6.1. Earth and Groundwater

How did we analyze Earth and Groundwater?

Consultants Landau Associates and The Watershed Company updated the Earth and Groundwater aspects of the 2013 EIS, focusing on two differences in information or the proposal:

- New information is available regarding earth resources onsite and groundwater conditions relevant to the studied alternatives.
- The Lakepointe 2018 Proposal Alternative includes potential underground parking not contemplated with the No Action Alternative (2013 Alternative 3).

This Supplemental EIS provides an abbreviated version of a technical report included in the Draft SEIS Appendices.

The analysis of Earth and Groundwater impacts examined whether there would be a reasonable likelihood of more than a moderate impact on environmental quality related to hazards and groundwater, including:

- Whether development allowed by alternatives would contribute to hazards or expose persons or property to harm or damage from hazards such as slopes susceptible to movement or landslides, abnormal erosion, settlement, subsidence, or other seismic hazards.

- Whether development allowed by alternatives would change groundwater availability and groundwater quality for existing users, reduce discharge to streams and springs, or result in infiltration of untreated stormwater, transportation related spills, and on-site spills of hazardous materials.

What outcomes or impacts did we identify?

Potential impacts associated with both alternatives are generally the same because the developable extent and area of the two alternatives are essentially the same (the additional density associated with the Lakepointe 2018 Proposal Alternative will be obtained by building taller structures) and there is no increase or change in location of impervious surface coverage. Both alternatives are anticipated to be subject to the following:

- The stability of post-reclamation steep slopes will need to be assessed during the design phase as outlined in Sections 18.65.250 and 18.65.300 of the CMC. Depending on the design details of the proposed roadway extension to 204th Avenue SE (Covington Connector), which ascends a hill in the southeast corner of the site, additional stability assessments may be needed in this area as well.
- Erosion potential will likely be highest during construction, particularly on slopes that exceed 15%. Soil erosion best management practices (BMPs) should be used during construction to manage/minimize these effects.
- Because mine reclamation is not yet complete and many of these variables are unknown, the degree of likelihood associated with various seismic hazards cannot be predicted. Impacts associated with soil liquefaction can be mitigated in a number of ways, including ground improvement, use of deep foundations, or designing for potential soil liquefaction impacts. The specific mitigation measures associated with future site improvements would be determined as part of the site-specific geotechnical study that will be completed.
- Pumping and dewatering the pit lake will be discontinued following the final prepared grade of the site (AES, 2019). Discontinuing groundwater pumpage will have short-term impacts to Jenkins Creek and associated habitat due to disruption of ecological processes dependent on augmented flows. The impacts are expected to last for several years as groundwater levels recover to more natural conditions of recharge and discharge. The restoration of natural groundwater will sustain late summer baseflows, reduce turbidity, attenuate some dissolved solids, and improve water quality overall.
- Rapid shutdown of the dewatering pump after project development may significantly reduce low flow in Jenkins Creek if it occurs during summer and early fall months. Sudden declines in water levels may strand juvenile fish and other aquatic organisms in shallow pools and overflow areas along the stream. Jenkins Creek is reported to provide rearing habitat for listed and threatened salmonid species. Stranding and predation during flow changes should be avoided. See mitigation measures to reduce significant adverse impacts regarding changes to fish habitat.

The impacts for the Lakepointe 2018 Proposal Alternative would be similar to those described for the No Action Alternative. Under the Lakepointe 2018 Proposal Alternative, impacts regarding dewatering the pit lake will be similar to the No Action Alternative.

What is different between the alternatives?

A unique feature of the Lakepoint 2018 Proposal Alternative is a proposed underground parking garage to be located in the "peninsula area" north of the pit lake, between two bays, as shown in the 2019 conceptual mass grading plan (Appendix B). The garage is to be built on 30 to 40 feet of fill (to elevation 390 - 400 ft msl) with the structure's lowest finished slab elevation at 382 ft msl. The anticipated groundwater elevation after recovery of the construction related drawdown is 381 ft msl with possible seasonal fluctuations of 3 to 6 feet (Golder, 2016). High groundwater levels at the parking garage will drain to an overflow system with an invert elevation of 382 ft msl and level discharge to Jenkins Creek (DEA, 2019). Because the site is already dewatered, and because the lowest level of the garage will be one foot above the recovered groundwater level, and because the proponent is proposing an overflow system with discharge to the creek, no additional mitigation measures are proposed.

What are some solutions or mitigation for the impacts?

The Planned Action Ordinance, Attachment B-1, contains Earth and Groundwater mitigation measures requiring appropriate studies, construction management, design, infiltration and recharge, secondary containment, well decommissioning and others. (See Final SEIS Appendix A.)

New information about groundwater conditions and management are known since 2013. The proponent is proposing a groundwater overflow system with an invert elevation of 382 ft msl and level discharge to Jenkins Creek. The overflow discharges to a settling pond, and therefore it may be considered an indirect discharge to Jenkins Creek. There is also some indication there was groundwater discharge to Jenkins Creek before the site was mined, so the overflow pipe is not necessarily a new discharge. The applicant is responsible for compliance with federal permits, if any are needed, from the US Army Corps of Engineers or other agencies regarding Jenkins Creek and Wetland A.

Rapid shutdown of the dewatering pump after project development may significantly reduce low flow in Jenkins Creek if it occurs during summer and early fall months potentially adversely affecting habitat for listed and threatened salmonid species. Stranding and predation during flow changes should be avoided as described above. A scheduled shut-down of pit lake dewatering in gradual stages during early Fall, from October to November when rainfall and runoff increase streamflow, may mitigate significant adverse environmental impacts, and maintain carrying capacity for stream organisms in Jenkins Creek.

Based on the SEIS Consultant team's review of new groundwater information and understanding of dewatering proposals (see Draft SEIS Appendix B), a condition of the site grading permit is proposed as follows applicable to either alternative:

- Upon completion of pond construction, the dewatering pump shall be shut down no sooner than October 1st of that year and in equal increments for four months, to allow the stream discharge to equilibrate. The City shall assure compliance through final inspection of the grading permit, that the pond was completed as designed, and dewatering completed as required.

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts have been identified for the earth elements at the Lakepointe Urban Village Subarea. Methods are available to build out the Lakepointe Urban Village

Subarea under both supplemental EIS alternatives without resulting in significant unavoidable adverse impacts.

1.6.2. Air Quality

How did we analyze Air Quality?

Impacts of the alternatives are analyzed at a programmatic level. This SEIS focuses on the evaluation of regional air quality impacts including tailpipe emissions, vehicle miles travelled, and GHG emissions, using similar methods (traffic model for vehicle miles travelled and King County GHG worksheet) as for the 2013 EIS.

For the purposes of this SEIS, air quality impacts are analyzed by examining whether:

- If the alternative would not accommodate or contribute to achieving goals and policies addressing air quality and climate change identified in the City's Comprehensive Plan.

What outcomes or impacts did we identify?

The forecasted VMT for the No Action Alternative is similar to and slightly higher than the forecasted values for the Lakepointe 2018 Proposal Alternative. For each alternative, the forecasted VMT from the Lakepointe Urban Village Subarea is only a small fraction of the Puget Sound regional totals, and would not alter regional study conclusions that future Puget Sound regional emissions will be less than the allowable emission budgets mandated by the air quality maintenance plans.

In comparison to existing conditions either alternative would remove GHG emissions associated with mine reclamation and asphalt batch plant operations within the Lakepointe Urban Village Subarea; however, both alternatives would result in higher total GHG emissions in the Lakepointe Urban Village Subarea due to future increases in population and employment.

What is different between the alternatives?

Total GHG emissions for Washington State were estimated at 94,400,000 metric tons CO_2-equivalent in 2013 (Ecology 2016). The relatively small increase in GHG emissions within the Lakepointe Urban Village Subarea associated with the No Action Alternative (21,166 metric tons per year net above existing for a total of 25,340) is not considered to be significant compared with total GHG emissions for Washington State.

Future development within the Lakepointe Urban Village Subarea associated with both alternatives would also contribute to worldwide emissions of GHG, which would contribute to potential future effects caused by global climate change (e.g., changes in seasonal temperature, seasonal precipitation, and local sea level rise).

Features of the No Action Alternative that would accommodate or contribute to achieving the City's goals and policies addressing air quality and climate change include the following:

- A master plan that would result in a mix of uses that allows living near shopping or working areas reducing motorized trips and greater energy conservation (Policy NE-11)
- Provision of onsite trails and connection to regional trails reducing motorized trips (Policy LU-6)

To meet the intent of City policies and the Planned Action Ordinance mitigation measures, future planned action development applications would evaluate the ability to implement a menu of site design and operation measures and implement feasible ones to reduce GHG emissions.

Features of the Lakepointe 2018 Proposal Alternative that would accommodate or contribute to achieving the City's goals and policies addressing air quality and climate change include the following:

- A master plan that would result in a higher amount of commercial and residential uses with horizontal and vertical mixed use that allows living near shopping or working areas reducing motorized trips and greater energy conservation (Policy NE-11)
- A park and ride to improve regional transit use (Policy LU-6)
- Provision of onsite trails and connection to regional trails reducing motorized trips (Policy LU-6)

The Lakepointe 2018 Proposal Alternative would provide more residential and employment growth in the Lakepointe Urban Village Subarea compared to the No Action Alternative. Therefore, it would increase localized GHG emissions within the Lakepointe Urban Village Subarea compared to the other alternative.

To meet the intent of City policies and the Planned Action Ordinance mitigation measures, future planned action development applications would evaluate the ability to implement a menu of site design and operation measures and implement feasible ones to reduce GHG emissions. The analysis of the effectiveness of some potential site design features to reduce GHG emissions is included in the Mitigation Measures section; the evaluation could help more optimal implementation of the Planned Action Ordinance mitigation.

What are some solutions or mitigation for the impacts?

Washington State has established GHG reduction goals (RCW 70A.45):

- By 2020, reduce overall emissions of greenhouse gases in the state to 1990 levels, or ninety million five hundred thousand metric tons;
- By 2030, reduce overall emissions of greenhouse gases in the state to fifty million metric tons, or forty-five percent below 1990 levels;
- By 2040, reduce overall emissions of greenhouse gases in the state to twenty-seven million metric tons, or seventy percent below 1990 levels;
- By 2050, reduce overall emissions of greenhouse gases in the state to five million metric tons, or ninety-five percent below 1990

However, neither Ecology nor the EPA have adopted numerical GHG emissions standards, GHG reduction requirements, or numerical GHG significance thresholds that direct local government land use development actions. It is the City's responsibility to implement its GHG reduction requirements for new developments.

The Planned Action Ordinance contains Air Quality mitigation measures (#16-#21) addressing construction. Planned Action Ordinance Mitigation Measures 20 and 21 provide a menu of GHG reduction options that will be evaluated for feasibility by each planned action development application.

The evaluation of measures in the Draft SEIS suggests how the current mitigation menu could be implemented in a more optimal manner.

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts on regional or local air quality are anticipated from the studied alternatives. Temporary localized dust and odor impacts could occur during the construction activities. The air quality regulations and mitigation measures described above are adequate to mitigate any adverse impacts anticipated to occur as a result of Lakepointe Urban Village Subarea growth increases.

1.6.3. Plants and Animals

How did we analyze Plants and Animals?

The SEIS summarizes plants and animals condition information and impacts from the 2013 EIS and provides updated information from resource agencies about elk species presence and the proponent's wildlife crossing approach and the SEIS Consultant's evaluation; this has resulted in adjustments to mitigation measures.

Based on WAC 197-11-444 elements of the environment and the 2013 EIS evaluation, the Supplemental EIS evaluates impacts including assessing:

- The potential for degradation or loss of wetland, stream, or fish and wildlife habitat.

What outcomes or impacts did we identify?

Under all of the alternatives, the riparian corridor, Jenkins Creek, and associated wetlands, would be left intact.

Per the 2013 EIS, disturbances to priority habitats and species would occur with increased pedestrian and vehicle traffic and reduced open water and vegetation, which were found likely to deter some species from using the remaining open water and vegetated fringe, even when suitable habitat is present.

The lack of elk presence would reduce the need for a wildlife corridor designed for that species; but a wildlife corridor designed to address other wildlife species remains relevant. Adjacent plantings will influence wildlife use of the crossing, affecting frequency of crossing use, the types of wildlife using the crossing, and the direction of wildlife movement leading up to and away from the crossing. Fencing can direct wildlife movement and prevent collisions with vehicles and may be appropriate depending on overall design and location considerations. A planting plan and fencing (or justification for no fencing) should be a part of the final wildlife crossing plan.

What is different between the alternatives?

The 2018 Proposal Alternative is being accommodated on land already proposed for development under the No Action Alternative (2013 Alternative 3) with no changes to the primary circulation, trails, open space, buffers, tree retention, impervious area, water quality, or pedestrian mobility. Thus, impacts would be similar to the No Action Alternative.

What are some solutions or mitigation for the impacts?

Changes to the site under any of the proposed alternatives would need to comply with current critical area regulations, stormwater design specifications, and other applicable regulatory standards of City, state, and federal laws. In addition, the Planned Action Ordinance, identified mitigation measures including water quality and baseflow, riparian corridor/wetland, stewardship program, plants, steep slopes and wetlands, wildlife, signage and pet waste, wildlife crossing, and reclamation compliance. Changes are proposed to Planned Action Ordinance Mitigation Measure 29 to address the lack of elk species.

WILDLIFE CROSSING

To reduce habitat fragmentation between the Jenkins Creek corridor and habitat patches to the south and west, a wildlife crossing shall be incorporated into the new arterial street design by Planned Action Project applicants to the satisfaction of the City's SEPA Responsible Official.

- A crossing ~~could potentially~~ shall be established in the southeast corner of the Planned Action Area, approaching the connection with 204th Avenue (Covington Connector).

~~In addition to providing safe crossing for elk,~~ A~~a~~ wildlife corridor could also benefit invertebrates and small mammals that are likely to access the open water feature (Hansen et al. 2005). Even mobile species, such as songbirds, exhibit a preference for travel through wooded corridors compared to open gaps (Desrochers and Hannon 1997). Installed plants will affect frequency of crossing use, the types of wildlife using the crossing, and the direction of wildlife movement leading up to and away from the crossing. Fencing can direct wildlife movement and prevent collisions with vehicles. A planting plan and fencing (or justification for no fencing) shall be a part of the final wildlife crossing plan. The wildlife crossing over or under the 204th Avenue (Covington Connector) shall demonstrate by design on how wildlife will connect to the open space and critical areas. The connection to the trail system to trail system shall also be shown.

Related to Mitigation Measure 30 Reclamation Compliance, the City notes that in 2017 the docket applicant received a letter from the US Army Corps of Engineers that is valid for five years regarding the gravel pit. See Draft SEIS Appendix B. The letter does not address Jenkins Creek and the associated wetlands, which would be subject to a separate determination in the future. Nothing about the additional development thresholds proposed in the amended proposal alters the applicant's timeline for reclamation and other work affecting the pond. The applicant reports that it expects to complete reclamation and other work affecting the pond within the five-year period and that the applicant has no plans to alter Jenkins Creek and associated wetlands that would trigger any need for an updated Corps determination. In the event a new determination is required, the applicant will be required to obtain the new determination.

With mitigation, what is the ultimate outcome?

As identified in the 2013 EIS, studied alternatives would cause some cumulative and avoidable impacts to critical areas and wildlife. These include increased human activity associated with more dense urban development, which could result in long-term disturbance to sensitive wildlife species in the vicinity of the Jenkins Creek corridor.

Cumulative impacts, such as increased impervious surface, increased pollutants, and habitat fragmentation, generally occur as a watershed is developed. While these impacts cannot be wholly avoided, they can be minimized and mitigated. Despite significant increases in impervious surface area, studied alternatives minimize adverse impacts through the following measures: 1) concentrating development in the area that is currently disturbed, 2) largely avoiding critical area impacts, 3) maintaining a native primarily forest buffer, 4) modifying site zoning to reduce impervious surface impacts, and 5) implementing low impact development (LID) stormwater practices.

1.6.4. Land Use Patterns/Plans and Policies

How did we analyze Land Use Patterns/Plans and Policies?

The SEIS compares and evaluates the proposed amount, types, scale, and pattern of land uses under each alternative. The Supplemental EIS also evaluates the Lakepointe 2018 Proposal Alternative for consistency with state, regional, countywide, and city plans and policies, including Growth Management Act Goals, Vision 2040 and the City's Resolution 2017-04, King County Countywide Planning Policies, and the City of Covington Comprehensive Plan.

For the purposes of this SEIS, and consistent with WAC 197-11-444, each alternative is studied for consistency with state, regional, and city plans, and matters including the following are evaluated:

- Inconsistency with current and proposed plans and policies.
- Change to land use patterns or development intensities that preclude reasonable transitions between areas of less intensive zoning and more intensive zoning.
- The possibility of particular uses permitted by zoning occurring to such an extent that they foreclose opportunities for higher-priority, preferred uses established by Comprehensive Plan objectives.

Alternatives' effects on land use patterns and plans would be considered less-than-significant if the changes are either supported by plans and policies or can be mitigated adequately to avoid significant changes.

What outcomes or impacts did we identify?

Under both alternatives, the Lakepointe Urban Village Subarea would be converted from an asphalt batch plant and mine reclamation site to an urban village featuring a mix of residential and commercial uses. While differing in amount, the mix of uses under the two alternatives would be similar, as would their location and arrangement on the development site.

Both alternatives are consistent with state goals and countywide planning policies to focus growth in urban growth areas (UGAs) and avoid sprawl.

The No Action Alternative would be consistent with growth anticipated in the 2015 Comprehensive Plan certified by PSRC. The Lakepointe 2018 Proposal Alternative further concentrates growth in a pedestrian oriented mixed-use setting in the city limits and can be served by planned transportation facilities and other infrastructure. There is no change to the urban growth boundary. The Lakepointe 2018 Proposal Alternative would therefore be generally consistent with the principles of VISION 2040.

Both alternatives would be subject to the design standards established in the Lakepointe Urban Village Subarea Plan and codified in Chapter 18.35.310 of the Covington Municipal Code.

What is different between the alternatives?

As described in the 2013 Final EIS, under the No Action Alternative (Alternative 3), the new urban village would feature approximately 1,500 residential units and 850,000 square feet of commercial space. The No Action Alternative would allow buildings at heights up to 60 feet, and impervious surface coverage in the subarea is anticipated to increase by approximately 99.6 acres when development is complete. As described in the 2013 Final EIS, due to local topographic conditions and vegetation features, building heights under this alternative are not anticipated to significantly disrupt existing views or otherwise create a visual obstruction for surrounding areas.

The Lakepointe 2018 Proposal Alternative is similar to the No Action Alternative in that just under half of site acres would be in commercial or residential use, and about one-third is in critical areas/open space. The proposal may have a differently sized park and park and ride facility. The central pond feature size is less than 20 acres.

The primary change in land use patterns compared to the No Action Alternative would be potential changes to single-family and townhome development. Under the No Action Alternative, single-family dwellings and townhomes were concentrated in the southwestern and eastern edges of the subarea; most of this area could instead be developed for mid-rise and low-rise multifamily apartments under the Lakepointe 2018 Proposal Alternative.

Adoption of the Lakepointe 2018 Proposal Alternative would require amendments to the Land Use and Economic Development elements of the Covington Comprehensive Plan. The Planned Action Ordinance would requirement amendment to address the new development program and address changes to mitigation measures as a result of this Supplemental EIS. To exceed the levels of growth associated with the No Action Alternative, adoption of the Lakepointe 2018 Proposal Alternative would result in revisions to the Lakepointe Urban Village Development Agreement (City of Covington Ord. 02-2017, Exhibit A).

What are some solutions or mitigation for the impacts?

The Planned Action Ordinance would be amended to retain consistency with the proposed amendments addressing the Comprehensive Plan and Subarea Plan.

To allow for greater development levels above the No Action Alternative amendments to the Development Agreement could be made. The City may propose additional public benefits to be incorporated into the Development Agreement in response to the increased development consistent with CMC 18.114.030.

With mitigation, what is the ultimate outcome?

Under all alternatives, land reclaimed and revegetated pursuant to the requirements of a Department of Natural Resources Surface Mining permit and reclamation plan would be permanently converted from open area to urban uses. However, much of this area is and historically has been disturbed, and redevelopment of the area has already been analyzed in the Hawk Property Planned Action EIS. With implementation of the measures described above, no significant unavoidable adverse impacts to land use patterns, plans, or policies are anticipated with the studied alternatives.

1.6.5. Transportation

How did we analyze Transportation?

The SEIS compares and evaluates the expected transportation conditions with each alternative, including review of the existing multimodal transportation facilities located in and near Covington. The SEIS describes methods applied to evaluate transportation impacts including updated methodologies for the Lakepointe 2018 Proposal Alternative and compares the expected transportation impacts and recommended mitigation measures.

ITE methods to account for internal trips were applied to the trip estimates for both the No Action Alternative and the Lakepointe 2018 Proposal Alternative with its Hypothetical Land Use. However, in 2017, ITE provided major updates to its rates and methodologies. Therefore, while the methods presented in the previous editions of the ITE manuals[1] were applied to the No Action Alternative in 2013, the updated methods presented in the current editions of the ITE manuals[2] were applied to the trip estimates for the Lakepointe 2018 Proposal Alternative and its Hypothetical Land Use.

Future 2035 traffic volumes with buildout of the Lakepointe 2018 Proposal Alternative were projected using the City's travel demand forecasting model that was previously developed for the 2013 Planned Action EIS and is described in detail in that document.

The analysis identifies significant impacts using Covington's level of service thresholds and what capital and programmatic mitigation measures are included to address significant adverse impacts.

What outcomes or impacts did we identify?

Based upon traffic operational analysis presented in the 2013 Planned Action EIS, both the No Action Alternative and Lakepointe 2018 Proposal Alternative are projected to add delay at intersections (listed with their projected to operate at LOS E or F.

What is different between the alternatives?

The 2,493 PM peak hour primary trips that are estimated for the Lakepointe 2018 Proposal Alternative with the Hypothetical Itemized Land Uses are below the PAO-defined threshold of 2,578 PM peak hour primary trips, which is based upon the estimate developed for the No Action Alternative.

The primary reason that the higher density of the proposed Lakepointe 2018 Proposal Alternative is projected to generate a similar number of trips is the update to ITE's internal trip calculation methodology, which reflects more robust data and internal trip calculation procedures than previous. Another contributing factor is the greater number of land use categories, evaluated in the Lakepointe 2018 Proposal Alternative's Hypothetical Itemized Land Use program as compared to the No Action Alternative, and a relatively high balance between the different evaluated land use types, leading to the higher internal trip estimate. Finally, the updated ITE methodologies also include updates to trip

1 ITE, Trip Generation Handbook, 2nd Edition, 2004; ITE Trip Generation Manual, 9th Edition, 2012.
2 ITE, Trip Generation Handbook, 3rd Edition, 2017; ITE Trip Generation Manual, 10th Edition, 2017.

generation and diverted-linked trip rates that affect the calculated total; however, the effect of updated rates is relatively small compared to the effect of the updates to the internal trip methodology.

Most study area roadways are projected to experience a lower volume with the Lakepointe 2018 Proposal Alternative. Some roadways are expected to have higher vehicular demands with the Lakepointe 2018 Proposal; the following inbound links are projected to experience the largest increases compared to No Action:

- Eastbound SE 272nd Street between SE Wax Road and 204th Avenue SE is projected to have an increase of between 15 and 25 vehicles (less than 2% of projected total eastbound volume).
- Westbound SE 272nd Street between Witte Rd SE and 204th Avenue SE is projected to have an increase of between 15 and 25 vehicles (about 2% of projected total westbound volume).
- Northbound 204th Avenue SE is projected to carry approximately 35 additional vehicles (about 9% of projected total northbound volume, offset by a projected decrease of about 13% in the southbound direction).
- Northbound SE 260th Street, just south of the Lakepointe area, is projected to carry approximately 15 additional vehicles (about 6% of total projected two-way volume).

To determine if the volume differences would change the impacts identified, they were compared to the roadways expected to be near or above capacity, and therefore are projected to operate with congested conditions that could require additional mitigation. None of the roadways on which the Lakepointe 2018 Proposal Alternative is projected to increase volumes by15 trips or higher coincides with roadways that are expected to be over capacity. It therefore is determined that the traffic impacts resulting from the Lakepointe 2018 Proposal Alternative would be similar to the No Action Alternative, and mitigation measures identified in the 2013 Planned Action EIS and updated in Exhibit S of the 2017 Development Agreement, would also be adequate to support buildout with the Lakepointe 2018 Proposal Alternative. The mix of uses and change in trip distribution patterns resulting from the Lakepointe 2018 Proposal Alternative is projected to result in an increase of 1% at one intersection and decreases of 1% to 4% at ten intersections. Small adjustments in the responsibility for mitigation would be needed for the 2018 Proposal Alternative's Hypothetical Itemized Land Use program which results in 2,493 PM peak hour trips. However, if retaining the 2013 trip cap of 2,578 PM peak hour primary trips the original share of trips at intersections may occur and the responsibility for mitigation in Exhibit S of the 2017 Proposal Alternative would be appropriate.

What are some solutions or mitigation for the impacts?

The mitigation identified in the 2013 Planned Action EIS would address impacts resulting from either the No Action Alternative or the Lakepointe 2018 Proposal Alternative.

- Incorporated Plan Features:
  - 204th Avenue SE Roadway Connection
  - SE 256th Street/SR 18 Ramp Intersections
  - 191st Avenue SE Local Access Street and Traffic Calming
  - Non-Motorized Connections

  - Park & Ride Facility
- Roadway Capacity Improvements: The project would contribute toward individual intersection improvements according to the percent share of PM peak hour trips
- Phased Mixed Use Development and Concurrency: Construction and occupancy of a mix of uses over time will help ensure the trip generation and internal capture numbers studied in this SEIS are achieved. Each implementing project also is required to demonstrate concurrency via a showing of trip generation for each project. Thus, trip generation will be tracked, providing the City the means to monitor progress, and compliance with the Trip Ceiling.
- City and Development Agreement Requirements would apply including, but not limited to:
  - City of Covington Design Standards
  - City of Covington Parking Code
- Planned Action Ordinance Mitigation Measures would be applied to each proposal to ensure capital improvements, impact fees, concurrency, and other requirements are implemented with each Planned Action application.

With mitigation, what is the ultimate outcome?

With recommended mitigation in place, no additional significant adverse unavoidable transportation impacts are expected to result from either the No Action Alternative or the Lakepointe 2018 Proposal Alternative.

1.6.6. Noise

How did we analyze Noise?

This noise study addresses the potential difference in traffic-related noise between the proposed No Action Alternative and the Lakepointe 2018 Proposal. Potentially impacted receivers were selected for this 2018 study based on more detailed conceptual land use plans associated with the Lakepointe 2018 Proposal Alternative than were available in 2013. The FHWA Traffic Noise Model Version 2.5 (Federal Highway Administration 2004) was used to predict existing and future noise levels.

The Covington Municipal Code (CMC) does not provide numerical thresholds for construction noise, traffic noise, or location of residential development. State and federal thresholds were used in this study to evaluate noise impacts.

What outcomes or impacts did we identify?

Under both alternatives, proposed future development would include construction of buildings, streets, and parking facilities, which would temporarily increase noise levels at residences close to the development site. Temporary daytime construction activity is not regulated under the CMC. This type of activity could cause annoyance at outdoor locations adjacent to the construction sites. Nighttime construction activity, if required at all, would only be allowed for public utility work within the right-of way and require a waiver and special mitigation measures from the City Manager or their designee.

Under both alternatives, the gravel mine area would be developed as an urban village featuring regional and local commercial space and a mixture of residential units. New commercial development would occur near either current or future residences. Unless properly controlled, mechanical equipment (e.g. rooftop air conditioning units) and trucks at loading docks of office and retail buildings could cause public disturbance noises. However, these commercial noise sources would be regulated under the City's noise code and would be required to be designed to avoid noise impacts to nearby onsite and offsite neighbors.

Traffic-related noise impacts on existing residences (R-3, R-4, and R-5) from the Covington Connector, 191st Place SE, and 204th Avenue SE do not differ significantly between the No Action Alternative and the Lakepointe 2018 Proposal. Under both alternatives, the modeled peak-hour traffic noise increase at the representative existing residences would not exceed 66 dBA or the WSDOT "substantial increase" impact threshold of 10 dBA.

The results of this screening-level FHWA Traffic Noise Model (FHWA TNM) modeling study do not show potentially significant increases in traffic noise (i.e. increases exceeding 10 dBA) at existing homes outside of the Lakepointe Urban Village area.

Noise levels modeled at the proposed hotel (R-1) range from 71 to 76 dBA, depending on the modeled distance from SR-18 and the Covington Connector, with SR-18 having the greatest impact on the receiver under the existing scenario and both alternatives. Noise levels modeled at the proposed assisted living facility (R-2) range from 75 to 80 dBA, depending on the modeled distance from SR-18. Based on the HUD guidelines, areas with noise levels above 65 dBA are generally considered unacceptable for residential development. Based on the FHWA NAC, noise levels at 72 dBA or above to be caused by new roads on existing hotels require noise abatement measures. While these uses are commercial in nature, they would be occupied for sleeping temporarily by visitors (hotel) or by those that are elderly or disabled (assisted living). The developer has indicated their interest in providing comfortable spaces for their users.

What is different between the alternatives?

Impacts are similar among alternatives.

What are some solutions or mitigation for the impacts?

Applicable codes include:

- Chapter 8.20 of the CMC establishes regulations to minimize the exposure of citizens to excessive noise.
- WAC 173-60-040 establishes maximum permissible noise levels for various environments, and construction activities and noise associated with commercial or residential development under both alternatives would be subject to these provisions.
- Federal FHWA funding, distributed by WSDOT, may be used for street improvements associated with this project and, as such, the noise criteria established in Title 23, Part 772 of the Code of Federal Regulations (CFR) may apply. WSDOT has adopted the FHWA NAC for evaluating noise impacts and for determining if such impacts are sufficient to justify funding of

noise abatement for new roadway construction and roadway widening projects with state funding.

The Planned Action Ordinance includes Mitigation Measures 31 through 33, summarized below:

- Construction Noise Abatement: implement noise control plans for daytime construction activities.
- Construction Noise Reduction: measures to reduce construction noise.
- Traffic Noise Mitigation: Traffic noise control measures at new dwellings along the new section of 204th Avenue SE within the planned action area.

Depending on final placement and design, high traffic noise levels could affect the users of the future onsite hotel and assisted living facility. To reduce potential impacts to future users of these facilities, the City could also require that developers integrate noise mitigation measures into designs. Potential mitigation measures include the following:

- Review the location of heavily travelled roadways during the design of the facilities.
- Orient buildings such that outdoor use areas are located on the sides of buildings away from roadways with high traffic volumes or use walls to protect sensitive outdoor use areas.
- Install acoustic windows and/or other building insulation measures to reduce interior sound levels, particularly on the sides of buildings exposed to heavily travelled roadways.
- The HUD Noise Guidebook, Chapter 4 (HUD; accessed December 10, 2018), provides additional guidance for how these noise attenuation measures could be incorporated into development near high-traffic roadways including the use of barriers, site planning with buffers and building orientation, and construction methods and materials (HUD 1991). Consideration of these and other potential mitigation measures by the developer could ensure that traffic sound levels in the various types of spaces in the hotel and assisted living facility are appropriate for their intended uses.

With mitigation, what is the ultimate outcome?

The screening-level noise study used for this analysis did not find significant differences in noise impacts overall between the No Action Alternative and the Lakepointe 2018 Proposal. However, the study indicated probable significant adverse traffic noise impacts at the potential studied sites of the hotel and assisted living facility, primarily due to traffic noise from SR-18. Mitigation measures described in section 3.6.5 could mitigate those impacts.

The study did not indicate the potential for significant traffic noise level increases at existing homes to the southwest, south, or southeast of the Lakepointe Urban Village.

1.6.7. Public Services

How did we analyze Public Services?

This section compares and evaluates the estimated effects on demand for public services under each alternative relative to current conditions, as well as how development proposed under each alternative would impact levels of service (LOS) for police and fire protection, schools, parks, and solid waste. Since publication of the Hawk Property Planned Action Final EIS in 2013, several changes have occurred in terms of provider responsibility and current effective level of service.

The impact analysis is based on population-based estimates of demand. Impacts on public services are evaluated to examine whether the alternatives would:

- Negatively affect the levels of service adopted by service providers as identified in the Affected Environment for each service.
- Result in an inconsistency with planned growth and capital plans.
- Result in increased demand for emergency services beyond current operational capabilities of service providers.

What outcomes or impacts did we identify?

Police: Under both alternatives, new development in the Lakepointe Urban Village Subarea would add residents to the City's population as well as a significant increase in retail businesses, increasing demand for police protection services. Under all alternatives, calls for service will increase with a greater increase by the Lakepointe 2018 Proposal.

Schools: Under both alternatives, new development in the Lakepointe Urban Village Subarea would increase the population of the Kent School District service area, increasing demand for educational services.

What is different between the alternatives?

Police: The No Action Alternative is anticipated to increase crime incidents by 14% with the residential population and 38% with employment uses. The adopted standard of 0.75 officer per 1,000 residents, calls for 2.1 officers to serve the additional 2,760 residents in the No Action Alternative. The City already has 16 officers as measured consistent with the adopted LOS. Up to 21 officers will be needed to meet the adopted Comprehensive Plan growth including the growth anticipated under the No Action Alternative. While the City has not adopted a police LOS standard for commercial uses in the City, extending the resident service LOS for police to include jobs, the projected increase in population and employment of 4,649 under the No Action Alternative could generate demand for 3.0 additional officers.

The Lakepointe 2018 Proposal Alternative would add approximately 3,220[3] residents to the City's population, or 460 more residents than the No Action Alternative. The Proposal Alternative would also add approximately 2,900 jobs, or 1,011 more jobs than the No Action Alternative. The No Action Alternative is anticipated to increase crime incidents by16% with the residential population and 58% with employment uses. Based on the City's adopted LOS standard of 0.75 officer per 1,000 population, the Lakepointe 2018 Proposal Alternative would generate demand for 2.4 officers, versus the 2.1 officers resulting from the No Action Alternative, or an increase of 0.3 officers. Extending the adopted police LOS standard as was done under the No Action Alternative, the projected increase in population and employment of 6,120 under the 2018 Lakepointe Proposal Alternative, would be a demand for 4.0 additional officers. The portion of which is attributable to the 2018 Lakepointe Proposal is 1.0. The Lakepointe 2018 Proposal Alternative development increases will drive an increased demand for police services, and will generate additional tax revenues that may be used to pay for those police services. The 2018 Lakepointe Proposal also includes payments to the City for new officer Training Costs.

Fire: According to the Puget Sound Regional Fire Authority (PSRFA) 2016 Capital Facilities Plan Update, the combined residential and commercial development under the No Action Alternative is anticipated to increase demand at PSRFA Station 78 by approximately 452 incidents per year. In total, development under the Lakepointe 2018 Proposal Alternative is anticipated to increase demand at PSRFA Station 78 by approximately 552 incidents per year. Under both alternatives, the proposed street network connections that would be created as part of future development in the urban village are anticipated to improve emergency access and reduce response times.

Schools: The No Action Alternative would result in demand to serve approximately 564 students. Given the hypothetical land use with less single family dwellings and more multifamily dwellings, the Lakepointe 2018 Proposal Alternative would result in demand to serve approximately 316 students. This is less than the No Action Alternative as there are fewer single-family homes that have a higher student generation rate than multifamily housing. Under both alternatives, while Cedar Heights Middle School and Kentlake High School have sufficient capacity to absorb the projected enrollment increase, additional elementary enrollment would exacerbate overcrowding at Jenkins Creek Elementary and could potentially create capacity issues at Cedar Valley Elementary.

Parks: Based on the requirements of the code and the proposed housing mix and density, the No Action Alternative would require approximately 5.1 acres of on-site park and recreation space, exclusive of open space occupied by critical areas, and provides at least 8.3 acres of parkland. The No Action Alternative would also incorporate sufficient on-site trails to meet the City's PROS Plan LOS standard of 0.75 mile per 1,000 population. This would require approximately 2.1 miles of trails to avoid increasing the City's overall deficit of trails, and the No Action Alternative provides about 3.0 miles of trails.

Based on the requirements of the code and the proposed housing mix and density, the Lakepointe 2018 Proposal Alternative would require approximately 4.2 acres of on-site park and recreation space,

[3] Uses the household size assumption of the Hawk Property EIS which assumes 1.84 residents per dwelling unit reflecting a mix of housing types that tend to accommodate smaller households (e.g. townhomes and apartments). This is smaller than the Census-based household size reported in the Comprehensive Plan Housing Element at 3.02 persons per household, which reflects 2009-2013 information and the City's predominantly single-family housing stock.

exclusive of open space occupied by critical areas. The Lakepointe Master Development Plan includes approximately 9.67 acres of park space. The Lakepointe Master Development Plan also shows two unscaled gathering spaces of about 1 acre to meet the applicable RCMU zone standards. Cumulatively, the total park and gathering space would equal 10.67 acres as proposed. The City's PROS Plan LOS would require approximately 2.4 miles of trails to avoid increasing the City's overall deficit of trails. The Lakepointe 2018 Proposal Alternative would also incorporate a minimum of approximately 3.0 miles of on-site trails.

Solid Waste: Based on King County's projected 2030 waste generation rates of 20.4 pounds per capita per week, the No Action Alternative would result in approximately 1,464 tons of additional solid waste per year. Based on King County's projected 2030 waste generation rates of 20.4 pounds per capita per week, the Lakepointe 2018 Proposal Alternative would result in approximately 1,708 tons of additional solid waste per year. Under both alternatives, rates are anticipated to be manageable within the existing capacity of the Cedar Hills landfill.

What are some solutions or mitigation for the impacts?

Planned Action Ordinance

The Planned Action Ordinance includes Mitigation Measures addressing public services such as:

- 38. Fire Mitigation
- 39. Parks and Trails

Some housekeeping edits are proposed to ensure the mitigation measures address the status of codes on impact fees. See Appendix A.

Development Agreement

Development under both Alternatives would be required to comply with the conditions of the Lakepointe Urban Village Development Agreement, which is designed to be consistent with the Planned Action Ordinance but not supersede any required mitigation required by the Planned Action Ordinance, as well as describe public benefits.

- **Police:** The Agreement provides a series of public benefits including a Police Storefront Substation to be included in the commercial area of the Lakepointe Urban Village. The Agreement also includes a requirement that the master developer consult early with the Covington Police Chief on the site design and building design.
- **Fire:** A mitigation agreement between the Planned Action Project developer and Puget Sound Regional Fire Authority (PSRFA) is required prior to development to address impacts to workload at PSRFA Station 78. If the mitigation agreement is superseded by an impact fee, Planned Action Projects must comply with the impact fee requirements, including those established in CMC 19.50.
- **Parks and Trails:** Development in the Lakepointe Urban Village Subarea must provide sufficient park space and trails to be consistent with both the LOS standards of the Parks and Recreation Element of the Comprehensive Plan and with the requirements of CMC 18.35.150, as established in the Planned Action Ordinance.

Police Services

The mitigation measures from the 2013 EIS and Planned Action Ordinance, as well as the public benefits in the Development Agreement continue in effect. In considering whether to approve the Lakepointe 2018 Proposal Alternative modified or additional mitigation is proposed below for legislative consideration and inclusion in the Planned Action Ordinance.

As part of the 2018 Lakepointe Proposal and included in the Planned Action Ordinance as mitigation, Oakpointe will pay for 75% of the recruiting, hiring, and training cost ("Training Costs") of four new entry-level police officers. Payment equivalent to one officer's Training Costs will be made to the City at each of building permit issuance for commercial development at 675,000 sf, 925,000 sf, 1,075,000 sf, and 1,320,000 sf. The Planned Action Ordinance includes the formula to be used at the time of each payment for calculation of same. These payments will not be triggered unless all items necessary to increase the development caps for the Lakepointe project are approved, including, the pending 2018 Comprehensive Plan amendments, the Planned Action Ordinance update, and the Development Agreement amendment.

To respect the Development Agreement requirements for Police coordination and space for operations, the following measures are proposed to be added to the Planned Action Ordinance. See also Appendix F for other examples of service demand and mitigation.

- Site Design and Building Design CPTED assessment by a professional with current CPTED Professional Designation is required for all non-single-family residential development within the Lakepointe Subarea.
- The Master Developer shall engage a CPTED practitioner with a current CPTED Professional Designation to incorporate CPTED provisions into the Master Developer Design Guidelines to ensure site and building design that limit use patterns that lead to conflict and negative behaviors and reducing the opportunities for crime.
- The Master Developer shall work with the Covington Police Department on the final location, design, size, and features of its substation within the RCMU zone in order to coordinate adequate policing of the site consistent with the Development Agreement.

Fire

Consistent with the Lakepointe Urban Village Development Agreement master development plan, both alternatives include construction of a central spine street connecting the west and east ends of the subarea. This street will reduce response times for emergency vehicles throughout the subarea, as well as residential areas to the east, which currently must be accessed by a more circuitous route.

Schools

Development in the Lakepointe Urban Village Subarea is subject to assessment of school impact fees, as required by CMC Chapter 19.40.

Parks and Trails

Consistent with the Lakepointe Urban Village Development Agreement Master Development Plan, both alternatives include development of sufficient publicly accessible park space to offset the demand created by additional residential development in the subarea. Consistent with the Lakepointe Urban Village Development Agreement master development plan, both alternatives include development of sufficient trails to meet the trails LOS standard.

With mitigation, what is the ultimate outcome?

Future population growth and development will continue to increase demand for all public services on both a local and regional level. With implementation of mitigation measures, no significant unavoidable adverse impacts are anticipated.

1.6.8. Utilities

How did we analyze Utilities?

The SEIS documents applicant and service provider commitments to serve the subarea, and the potential effect of increased growth on service to the site. Since the extent of the development area has not changed and the applicant has committed to the City's stormwater standards, this section focuses on sewer and water systems.

This section considers whether there are impacts based on the City of Covington's Level of Service Standards which reference the gallons per capita consistent with service provider system plans.

For this SEIS, impacts were evaluated for these conditions:

- Inconsistency with utility system planned growth and capital plans.
- Potential to require major new projects or initiatives for utility system upgrades to accommodate redevelopment.

What outcomes or impacts did we identify?

Both alternatives will increase the demand for sewer and water services.

What is different between the alternatives?

Sewer: The Soos Creek Water and Sewer District existing sanitary sewer system and the existing sanitary sewer Lift Station 11B (located to the southwest of the subarea) have adequate capacity to serve urban growth projected under the No Action Alternative (Alternative 3 2013). The Lakepointe 2018 Proposal Alternative is estimated to generate a greater demand for sanitary sewer service than the No Action Alternative (Alternative 3 2013). The Soos Creek Water and Sewer District has confirmed adequate capacity to serve the larger commercial space and dwelling units associated with the Lakepointe 2018 Proposal Alternative. (Mattioda, 2018) The design of the utilities must address the District's preferred connection point as well as meet City requirements.

Water: The Water System Plan assumes that vacant land would be developed such as for residential purposes and that commercial areas within Covington, including the subject site, would become denser. The site is illustrated as a location for commercial and mixed uses in the future. Impacts are similar to the No Action Alternative though there will be an incremental increase in demand for water service. The District has confirmed it can serve the increased development. (Mesker, 2018)

What are some solutions or mitigation for the impacts?

Plans and regulations adopted at the time development permits are submitted will be applicable including consistency with the City's Municipal Code, Service Provider Plans and Standards, and the Development Agreement:

- CMC Title 13 Public Utilities
- Soos Creek Water and Sewer District Comprehensive Plan
- Covington Water District Water System Plan
- CMC 18.35.170 Dedication of parks and trails – Required by capital facilities plan.
- 18.50.150 Trail improvements and connections.

With mitigation, what is the ultimate outcome?

While both proposed alternatives will generate additional demand for water and sanitary sewer facilities, no significant unavoidable adverse impacts are anticipated. The water supply and sanitary sewer impacts have been anticipated by both the Covington Water District and the Soos Creek Water and Sewer District. The existing water supply and sanitary sewer capacity are adequate to accommodate the demands of the subarea, but additional water and sewer transmission facilities will be needed to and within the subarea.

2.0 Comments and Responses

2.1. COMMENT OPPORTUNITIES

During the Draft SEIS comment period held February 2, 2021 to March 4, 2021, written comments were received from three persons listed below.

The issues raised in each comment letter are providing a corresponding response. Comments that state preferences on alternatives or other matters are acknowledged with a response that the comment is noted and forwarded to City decision makers. Comments that address methods, analysis results, mitigation, or other matters are provided a response.

The City also held an online community meeting during the comment period on February 18, 2021 and the comments and questions addressed during the meeting question and answer period are shown.

Input received will be considered by the City Council prior to their decision on the proposal.

2.2. RESPONSES TO COMMENTS

Written comments received during the comment period are excerpted and provided responses in the following table.

Exhibit 2-1. Written Comments and Response Matrix

Comment Summary	Response
Keith Carroll, February 4, 2021	
…I have been a resident of Covington my entire life. Some people do not agree with how much Covington has grown, however I am a realist and I understand how and why Covington has grown so much in recent years. I was reviewing the proposal and information offered for review and I have a concern over the police service demand. I believe that we need to add more police then what it is stating. The document detailing the increase in police demand I believe is pretty light. Tukwila for example has 158 violent crimes and 3,350 property crimes, with a rate of 7.77 violent crimes per 1,000 residents, and 164.64 property crimes per 1,000 residents (you can find the stats I used here). This is with 79 police officers, granted this is also in between some of the worst areas; skyway, seatac, burien, renton, and kent. Whereas if you look at Bonney Lake, they have 31 officers and their crime rates are 1.75 violent crimes per 1,000 residents, and 17.92 property crimes per 1,000 residents. Covington is showing 1.7 violent crimes per 1,000, and 27.49 property crimes per 1,000.	Thank you for your comments. The City has established a police level of service in the Comprehensive Plan based on population growth; in the SEIS the combined commercial and population growth was also considered given differences in calls for service. The Police Chief collected research from other cities reflected in the Draft SEIS appendices. The SEIS reflects a voluntary agreement to fund training for officers to be available to serve the increased development. In addition, the tax revenues the city receives from the development would add to the City budget to fund additional year round public service at the City's levels of service. The City could consider an increased police level of service as part of its Comprehensive Plan periodic review due in 2024. The City would need to determine an appropriate distribution of revenue/costs across a number of services including police.

Comment Summary	Response
If you break down police presence to a square mile (rounding to ceiling), Tukwila has 9 per square mile, Bonney Lake has 4 per square mile, and Covington only has 3 per square mile. Two factors to consider though for those two cities. Bonney Lake has a lot more wooded areas than we do now, and a lot more streets and typically less congestion. Tukwila is almost all retail space, and very little trees and more congestion. The reason you should take this into account is because the more streets, the faster it is for police to get somewhere, Covington does not have a lot of streets. The less congestion, the faster as well, however personally spending a lot of time in all 3 cities, I can say that the congestion is about the same. Although getting out of Tukwila at 5pm at night is very difficult however they have wider streets making it easier for police. Then the wooded areas, Tukwila doesn't have a lot of wooded areas, so the 9.6 square miles is almost all retail and residential. Bonney Lake has more wooded areas than us and larger property sizes, therefore they should actually require a smaller police presence than Covington. With all of this taken into account, I would say that the police increase will fall short, causing a higher crime rate in Covington. We should actually increase the police presence to 5 per square mile. Almost doubling our current police staff, 30 (rounding to floor). I do this for a living, so when it comes to data, you should trust my analysis. I understand that doubling our police force is not likely until we have an increase in tax revenue. Therefore, I would recommend that while this project is in its early phase to put 2 police officers in, and by completion add 8, not 4. Maybe add them in two phases, 4 by time of completion with another 4 added by 1 year after. Other than that, I think everything else looks fine. Thank you for all of the information.	
Sheryl Ward March 3, 2021	
I am writing in response to the Lake Point Development proposal of expanding both the residential and commercial footprint for the development site. I attended the zoom meeting as well. I am very concerned about the increase in commercial space at approx. 55% and the increase of residential spacer as well. I looked over the 2017 development map and I do not see the plan for the additional 220 homes (I may be off a bit with that number) for the corner of the property. While I appreciate the developer wanting to maximize the land use but we had an agreement in 2017 which met the needs of both the community and the developer.	Thank you for your comments. Your comments are noted and forwarded to City decision makers. Please see the SEIS analysis of public services and transportation and proposed mitigation measures in the amended Planned Action Ordinance.

Comment Summary	Response
The additional removal of existing trees, the redirection of one of the access roads, the impact on the Covington info structure with additional police officers , the negative impact on the community is of big concern. Our community members spent a lot of time attending council meetings and development meetings to ensure our voices are heard. Unfortunately recent events only allow Zoom meetings which many of my neighbors were unable to attend due to computer challenges. We have not even seen the impact of the 2017 agreement and the developer wants even more. This week our family had the unfortunate sightings of displaced wildlife which resulted in a ravage attack from coyotes so we are definitely looking forward to the wildlife access that is being proposed. I am opposed to the request to increase the residential size. I am also opposed to the increase of the commercial size as well unless it was to allow for a two story retail which would entice more prominent commercial leasers i.e. REI.	
Stephen Oles, February 5, 2021	
1.The 204th extension will run through the woods above and around my property, but not right along my fence. On the other side of my fence is one of the last stands of virgin forest not cut down to build Maple Hills houses. Does this property belong to Lakepointe and do they plan to build houses there? I hope not.	The property directly north of the commenter's property is the Lakepointe Urban Village Subarea and owned by Lakepointe Covington Inc. Much but not all of that area is mapped as steep slopes. See 2017 Development Agreement Exhibit J for a high level master plan of the subarea. See the website for the exhibits: https://www.covingtonwa.gov/lakepointe/developmentagreement.php This master plan was considered part of the Lakepointe 2018 Proposal. See Draft SEIS Chapters 1 and 2, and Chapter 1 of this Final SEIS.
2. Does Lakepointe plan to leave some woods (with a trail) bordering the west side of the Pipeline Easement (the ravine at the bottom of my hill)? Some maps seem to show this.	The 2017 Development Agreement Exhibit N shows the existing tree canopy, and where development is expected and where trees are expected to remain. Development Agreement. Exhibit T is the master trail plan that will be constructed by Lakepointe as the subarea develops.
3. Will the woods on the other side of my backyard fence remain undeveloped except for the extension of 204th? These woods border the west side of Cedar Creek Park.	See Response to Comment 1 regarding the master plan of the subarea. Parcel number 2022069012 is within the R-6 zone of the Lakepointe Urban Village Subarea located on the eastside of the future Covington Connector (204th extension) that abuts existing Maple Hills homes. This is where the Master Developer plans to subdivide and build approximately 22 single-family homes, and will remove all of the trees on that parcel in the process.

Comment Summary	Response
	Directly north of the commenter's parcel is an area within parcel number 2922069162 with mapped steep slopes and existing tree canopy that should remain; no development including houses are proposed in that area between the Williams gas pipeline easement and the future Covington Connector.
I just discovered the entrance to the Cedar Creek Park trails five blocks from my house in the brand new Maple Hills subdivision. The Jenkins Creek trail heads from there west through the woods and into the ravine called the Pipeline easement on some maps. Building houses on the other side of my fence would take out this trail and others, eliminating any connection between the Cedar Creek Park trails and the planned trail that will run along the south border of the main Lakepointe site. I hope the woods behind my house will remain woods, with its trails connecting Cedar Creek Park trails to the planned Lakepointe trails.	The 2017 Development Agreement Exhibit T master trail plan shows the current plan for trail connectivity into and throughout the subarea and abutting subdivisions and king county park trails.

On February 18, 2021, the City held a virtual community meeting consistent with RCW 43.21C.440(3)(b) regarding the planned action. The recording and presentation are available at the project website: https://www.covingtonwa.gov/lakepointe/:

- Recording
- PowerPoint presentation

An opportunity for questions and answers were provided. Results are shown in the table below. For some comments supplemental answers developed after the meeting are included.

Exhibit 2-2. Community Meeting Questions and Answers

#	Asker Name	Question	Answer(s)
1	Sarah Resetar	Where would this new proposed neighborhood be? Off of the new extension of 204th? Near the entrance of Maple Hills?	Yes, that is correct. It's not a new proposal - it would be an area in the R-6 zoning district on the eastern side of the subarea that abut the Maple Hills Subdivision and the King County Cedar Downs open space area. The 22-lot subdivision for single family residential development is planned on Parcel number 022069012.
2	Jolene Bleistein	Following up on Sarah's question, how many homes are expected in the new neighborhood on 204th and would it be along both sides of 204th or would it be on either the east or west side of it?	As of today there appears to be 22 new single-family residences

#	Asker Name	Question	Answer(s)
3	Jeff	What is RCMU?	Regional Commercial Mixed Use Zoning District.
4	Steve O -- Covington WA	Ah, so about 22 homes will be built on a cul de sac just on the east side of 204th. I'm happy to hear that since my house is on the west side, abutting lovely woods behind my back fence.	That is correct. See responses to written comments from Stephen Oles, February 5, 2021 above in Exhibit 2-1.
5	Jeff	What are your plans for the RCMU	There are a variety of allowed commercial uses allowed in that area. It will be up to the developer to propose the specific uses consistent with the allowed uses for the RCMU zone. https://covingtonwa.gov/city_departments/communitydevelopment/Lakepointe/DA%20Exhibit%20J.pdf At the end of the slide presentation we will share the master developers - website where they have some marketing information on the development on that site that you might want to look at for their ideas. Again no specific land use applications have been submitted at this time.
6	Steve O -- Covington WA	I want to commend Anne and Ryan for being so forthcoming and helpful understanding this, when I inquired a month or two ago.	Thanks Steve!
7	David Boyovich	Will the main road be expanded as we currently struggle to get into Covington during peak hours as our urban sprawl has out grown our highway infrastructure	I'll ask the public works director to address your question specifically but here is a link to the 204th webpage. https://www.covingtonwa.gov/update204th/ The Covington Connector roadway will be constructed between SR 18 and SR 516 which will provide additional options.
8	David Boyovich	yes it does	
9	Lynne	Will the slide deck presented today be available to attendees after this webinar? I missed some of the information.	Yes I will post a link on the webpage after this meeting. (See link above the table.)
10	Jesse	What improvements will be done with the power supplier (PSE?) to ensure that the additional load required to	Puget Sound Energy was provided a copy of the Draft SEIS in February 2021 and did not provide comments. They were also provided a copy of

#	Asker Name	Question	Answer(s)
		support this development can be sustainably provided?	the 2013 EIS and provided no comments. Proposals considered a Planned Action will prepare a checklist and would be identified in Notices of Application consistent with City permit procedures, which may provide other opportunities for Puget Sound Energy to review permits. PSE regularly prepares integrated resource plans to identify future energy needs in accordance with state law. See: https://pse-irp.participate.online/2021-IRP/Reports
11	Anonymous Attendee	Is Cedar Creek Park going to be impacted by the single family homes?	Cedar Creek Park abuts the proposed 22-lot single family homes.
12	Jesse	The question is what are we (government oversight) doing to ensure that PSE can handle the load and not create further blackouts/ strain on the infrastructure which already has so many issues	See Response 10.
13	David Caudle	Could you please provide additional information regarding the roadway going across the Williams Pipeline; any worries?	Please see the project website regarding the 2014 Ave SE Update: https://www.covingtonwa.gov/update204th/. Williams Pipeline has been consulted to ensure proper design.
14	Anonymous Attendee	When do you anticipate the residential phases being sold off/ breaking ground on foundations?	That is really up to the Master Developer.
15	Ralph Lewis	I live just below the 256th off ramp from SR-18. How is the "predicted" noise levels determine for 2035?	Please see Draft SEIS section 3.6. Current and projected traffic volumes and distance to future homes was considered.
16	Lynne	While the Covington Connector and Interchange will serve the immediate area, have you considered regional transportation impacts from the Lakepointe Development Project? Specifically, more commuters from Ten Trails and Lakepointe developments = high traffic volumes on roadways not designed to accommodate them.	The proposal was included in the City's concurrency model and cumulative effects considered. See Section 3.5 of the Draft SEIS.
17	Steve O -- Covington WA	There is an entrance to the Cedar Creek Park trails on 256th between two new Maple Hills houses. I believe about half the park is County and half	The City has transferred ownership of property to King County that it previously owned (north of) adjacent to Cedar Creek Park.

#	Asker Name	Question	Answer(s)
		is City of Covington. There may be another entrance 100 yards or so east of this on the same street.	
18	David Boyovich	What is the expected time frame for completing the 204 connection to 256th Hwy 18 exit	The first phase of the Covington Connector (204th Corridor) is expected to be complete in the late Fall of this year. The SR 18 interchange improvement phase is expected to be complete in late 2022. The phase through the Lakepointe Development is anticipated to start early next year and is expected to take about a year to complete.
19	Sarah Resetar	FYI - We aren't able to unmute.	If you raise your hand I can ask you to unmute when you're provided the authorization
20	Zinara Carter	apologies hit unmute on accident	If you would like to speak please raise your hand again.
21	Tarn Shoker	When is the expected completion date for the 204th connector project?	The first phase of the Covington Connector (204th Corridor) is expected to be complete in the late Fall of this year. The SR 18 interchange improvement phase is expected to be complete in late 2022. The phase through the Lakepointe Development is anticipated to start early next year and is expected to take about a year to complete.
22	Steve O -- Covington WA	Do you have an update on the black drainage culvert that runs down the hill from 204th and the new Maple Hills houses? Is it city owned or private? I've been told this culvert will be replaced with another. Also, that the culvert will be somehow covered up -- with earth? (A surveyor appeared a couple months ago in my backyard, planting a stake since tearing down my back fence to make room for this project was a possibility. I've been reassured this will not be necessary for my lot.)	I believe that is a temporary structure and the final design will be addressed with the roadway design and/or subdivision applications
23	matt graham	Are there plans to update the schools to handle the growth (zones or facilities)?	See section 3.7 of the Draft SEIS.
24	Pat Miller	Might not be appropriate for this meeting since you're addressing	The connection to 191st would be made after the Covington Connector is

#	Asker Name	Question	Answer(s)
		adding the extra homes. But, I'd like to know when/if there will widening or improvement on the 191st through street.	completed. It would be designed with traffic calming measures such as on-street parking, landscaping, and/or features/devices such as traffic circles to limit access to the local neighborhood. See Section 3.5 Transportation. 191ST PL SE has 58 feet of existing right-of-way(ROW) width between Timberlane Way SE and the southern boundary of the subarea; future traffic calming improvements are anticipated to be accommodated within the existing ROW- no new ROW should be necessary.
25	Jenn H	When is the expected date to break ground on the actual Lakepointe area, not just the roads?	The phasing of the subarea development is in the Development Agreement and is anticipated to talk 15-20 years to complete.
26	Jenn H	Do you have funding secured for all of the roads?	The Covington Connector funding has been secured. Other roadway improvements would be made onsite by the developer or impact fees paid for offsite improvements.
27	Steve O -- Covington WA	One question	live answered
28	Steve O -- Covington WA	The section of 204th from 516 to where it curves westward through the woods -- what will its configuration be?	The future extension of the Covington Connector from the subarea's southeast boundary (top of 204th) is 68' of ROW with 34' of roadway consisting of two-12' lanes and two-5' bike lanes. It has 5' planter strips and 5' sidewalks on both sides. There is no median as it comes off the hill to reduce roadway footprint (& minimize impacts to critical areas). As it turns west at the bottom of the hill (past the wildlife crossing), it begins to widen to allow for auxiliary lanes (left turn pocket, etc.) and ultimately transitions to over 90' of ROW with four-12' lanes (two in each direction) and a 9' wide median. The 5' planter strips continue and in some areas will be wider to allow for stormwater swales. The bike lane transitions next to the sidewalk to create a 10' wide section (5' bike lane and 5' sidewalk).
29	Steve O -- Covington WA	Two lanes? Sidewalks? Bike lanes? Planted median?	See response to question 28.

#	Asker Name	Question	Answer(s)
30	Steve O -- Covington WA	Will 204th become 4 lanes at some point as it approaches Lakepointe?	See response to question 28.
31	Bianca Foote	Is there an estimated time of completion for the Lakepoint development? 5, 10, 15 years?	The subarea plan and development agreement assume 15-20 years.
32	Anonymous Attendee	For the SEIS, what is the breadth of the area being studied for the noise impact? When my husband and I were speaking to Lisa in 2018, she said they were only looking at the impacts within Lakepoint, and not the adjacent neighborhoods. Is that still the case?	There is an onsite analysis in the 2013 EIS and the 2021 Draft SEIS Section 3.6 which addresses onsite sensitive receivers. The proponent is studying offsite noise for the 204th Street improvements south of the site and west of the site at the interchange. The Planned Action Ordinance include mitigation measures to address noise for residential and other sensitive receives (e.g. windows, setbacks).
33	Laura Grissom	Is this being recorded for the public to come back and listen to later? I missed the first 30 minutes or so.	Yes. It will be uploaded to the website within the next week or so.
34	Jolene Bleistein	With 204th St narrowing from 4 lanes within the Lakepoint Development as it goes up the hill towards Maple Hills and with anticipated additional usage along that road for traffic to and from 18, do we anticipate bottlenecking as the road narrows going up the hill?	We anticipate that the 2 or 3 lane segment will be adequate to handle the expected growth.
35	Ralph Lewis	Is there anticipated negative impact to the value of those homes directly next to both entrances/off ramps to this project.	There is an interchange that exists in the unincorporated land abutting the site; homes in proximity would already be affected. No new single family is planned as part of the Lakepointe development near the interchange.
36	Anonymous Attendee	So if there is an additional analysis for the round-a-bouts at Hwy 18, will those results also be added together? It's a cumulative affect, not just piecemeal.	Yes, the roundabout operations were studied at the same time as the roadways. The roundabouts are being sized to adequately move the traffic demands that we are expecting for the full buildout of the development.
37	Steve O -- Covington WA	Any answer on my black culvert question above? What exactly is to be done and when? It runs down the hill from 204th right where it starts to	See responses to written comments from Stephen Oles, February 5, 2021 above in Exhibit 2-1.

#	Asker Name	Question	Answer(s)
		curve into the woods. Sorry to repeat...	
38	Anonymous Attendee	Is this entire development only going to have two points of access?	There would be three points of access including the Covington Connector to the interchange on the west and to the extension of 204th Avenue SE to the east. As well 191st Avenue SE would connect.
39	Steve O -- Covington WA	Okay. Thanks.	live answered
40	Anonymous Attendee	Seems like a lot of trips to not include a second access point, for potential evacuation or other emergency access requirements, along 18	See Response 24.
41	Anonymous Attendee	great, the 191st connection is not one I've noticed before	The comment is noted and forwarded to city decisionmakers.

3.0 Clarifications and Corrections

Following are clarifications and corrections to the Draft Supplemental Environmental Impact Statement (Draft SEIS). The clarifications and corrections do not change the conclusions of the Draft SEIS.

3.1. CHAPTER 1 SUMMARY

Amend Section 1.6.2 regarding applicable air quality standards to match Chapter 3 and reflect more recent laws as follows:

Washington State has established GHG reduction goals (RCW 70A.45) ~~with targets for 2020 (1990 levels), 2035 (20% reduction below 1990 levels) and 2050 (50% reduction below 1990 levels), and adopted requirements for capital investments, an energy strategy, and VMT reduction targets.:~~

- By 2020, reduce overall emissions of greenhouse gases in the state to 1990 levels, or ninety million five hundred thousand metric tons;
- By 2030, reduce overall emissions of greenhouse gases in the state to fifty million metric tons, or forty-five percent below 1990 levels;
- By 2040, reduce overall emissions of greenhouse gases in the state to twenty-seven million metric tons, or seventy percent below 1990 levels;
- By 2050, reduce overall emissions of greenhouse gases in the state to five million metric tons, or ninety-five percent below 1990

Amend Section 1.6.5 transportation to match the proposed Planned Action, Draft SEIS Appendix A.

To determine if the volume differences would change the impacts identified, they were compared to the roadways expected to be near or above capacity, and therefore are projected to operate with congested conditions that could require additional mitigation. None of the roadways on which the Lakepointe 2018 Proposal Alternative is projected to increase volumes by15 trips or higher coincides with roadways that are expected to be over capacity. It therefore is determined that the traffic impacts resulting from the Lakepointe 2018 Proposal Alternative would be similar to the No Action Alternative, and mitigation measures identified in the 2013 Planned Action EIS and updated in Exhibit S of the 2017 Development Agreement, would also be adequate to support buildout with the Lakepointe 2018 Proposal Alternative. The mix of uses and change in trip distribution patterns resulting from the Lakepointe 2018 Proposal Alternative is projected to result in an increase of 1% at one intersection and decreases of 1% to 4% at ten intersections. Small adjustments in the responsibility for mitigation would be needed for the 2018 Proposal Alternative's Hypothetical Itemized Land Use program which results in 2,493 PM peak hour trips. However, if retaining the 2013 trip cap of 2,578 PM peak hour primary trips the original share of trips at intersections may occur and the responsibility for mitigation in Exhibit S of the 2017 Proposal Alternative would be appropriate.

3.2. CHAPTER 3, SECTION 3.5 TRANSPORTATION

Amend the following text in Section 3.5 to match the proposed Planned Action, Draft SEIS Appendix A.

Changes to Proportional Trip Shares

The 2013 Final EIS presented potential trip increases or reductions at intersections in and near the city. The mix of uses and change in trip distribution patterns resulting from the Lakepointe 2018 Proposal Alternative is projected to result in an increase of 1% at one intersection and decreases of 1% to 4% at ten intersections compared to the No Action Alternative, as shown in Exhibit 3.5-10. Small adjustments in the responsibility for mitigation would be needed if considering the 2018 Proposal Alternative's Hypothetical Itemized Land Use program which results in 2,493 PM peak hour trips. However, if retaining the 2013 trip cap of 2,578 PM peak hour primary trips the original share of trips at intersections may occur and the responsibility for mitigation in Exhibit S of the 2017 Proposal Alternative would be appropriate. See Appendix A.

4.0 References

Mattioda, D. (2018, 12 3). Supervisor, Development Administration, Soos Creek Water & Sewer District. (P. B. Lisa Grueter, Interviewer)

Mesker, M. (2018, 12 3). Senior Project Coordinator, Covington Water District. (P. B. Llsa Grueter, Interviewer)

5.0 Distribution List

The following entities and individuals were provided a notice of availability or postcard regarding the availability of the SEIS.

Federal and Tribal Agencies

Muckleshoot Indian Tribe

United States Fish & Wildlife Service

United States Geological Survey

United States Postal Service

US Army Corp. of Engineers, Seattle District

State and Regional Agencies

Puget Sound Clean Air Agency

Puget Sound Partnership

Puget Sound Regional Council

Seattle/King County Public Health

Washington State Department of Commerce

Washington State Department of Corrections

Washington State Department of Ecology, SEPA Unit

Washington State Department of Fish & Wildlife

Washington State Department of Health

Washington State Department of Natural Resources

Washington State Department of Social and Health Services

Washington State Department of Transportation

Adjacent Jurisdictions

City of Black Diamond

City of Kent

City of Maple Valley

(see King County departments below)

Services, Utilities, and Transit

BNSF Railway Company

Bonneville Power Administration, Covington Substation

Century Link

Comcast

Covington Water District

Green River College

Kent School District

Kent School District Transportation

King County 911

King County Department of Natural Resources and Parks, Parks and Recreation Division

King County Dept. of Assessment

King County Dept. of Permitting and Environmental Review

King County Dept. of Transportation

King County Metro Transit Division

Lake Meridian Water District

Public Health Seattle King County, Environmental Health Services Division/SEPA Coordinator

Puget Sound Energy

Puget Sound Regional Fire Authority

Republic Services

Soos Creek Sewer and Water District

Williams Pipeline

Community Organizations and Individuals

Covington Chamber of Commerce

Crest Air Park

Green River Coalition

Timberlane Homes Association

Proponent (see Fact Sheet)

Property Owners within 500 feet

Persons providing comments during comment period (See Chapter 2)

Appendix A – Proposed Planned Action Ordinance

ORDINANCE NO ~~04-14~~XX-21

AN ORDINANCE OF THE CITY OF COVINGTON, WASHINGTON, ~~ESTABLISHING A~~AMENDING ORDINANCE NO. 04-14, THE PLANNED ACTION FOR THE ~~HAWK PROPERTY~~LAKEPOINTE URBAN VILLAGE SUBAREA PURSUANT TO THE STATE ENVIRONMENTAL POLICY ACT.

WHEREAS, the State Environmental Policy Act (SEPA) and its implementing regulations provide for the integration of environmental review with land use planning and project review through the designation of planned actions by jurisdictions planning under the Growth Management Act (GMA), such as the City of Covington ("City"); and

WHEREAS, Section 43.21C.440 of the Revised Code of Washington (RCW), Sections 197-11-164 through 172 of the Washington Administrative Code (WAC), and Section 16.10.180 of the Covington Municipal Code (CMC) allow for and govern the adoption and application of a planned action designation under SEPA; and

WHEREAS, the State Department of Commerce (DOC) has studied planned actions in various communities throughout the state and found that predefined mitigation as allowed under a planned action ordinance has resulted in increased certainty and predictability for development, time and cost savings for development project proponents and cities, and increased revenues for cities when used with other economic development tools; and

WHEREAS, the designation of a planned action expedites the permitting process for projects of which the impacts have been previously addressed in an environmental impact statement (EIS); and

WHEREAS, a subarea of the City commonly referred to as the "~~Hawk Property~~Lakepointe Subarea", as depicted on the map attached hereto as Exhibit A and incorporated herein by this reference, has been identified as a planned action area for future redevelopment from a reclaimed mine and asphalt batch plant to an urban village ("Planned Action Area"); and

WHEREAS, the City has developed and adopted a subarea plan complying with the GMA (RCW 36.70A), dated February 11, 2014, to guide the redevelopment of the Planned Action Area (~~"~~Hawk Property Subarea Plan~~" Ord. 01-04,); and~~now referred to as Lakepointe Urban Village Subarea Plan); and

WHEREAS, after extensive public participation and coordination with all affected parties, the City, as lead SEPA agency, issued the Hawk Property Planned Action Final Environmental Impact Statement ("FEIS") dated November 14, 2013, which identifies the impacts and mitigation measures associated with planned development in the Planned Action Area as identified in the Hawk Property (Lakepointe Urban Village) Subarea Plan; the FEIS includes by incorporation the Hawk Property Planned Action Draft Environmental Impact Statement (DEIS) issued on July 26, 2013~~ (collectively referred to herein as the "Planned Action EIS");~~; and

WHEREAS, the City ~~desires to designate~~designated a planned action under SEPA for the Hawk Property Subarea also known as the Lakepointe Urban Village Subarea ("Planned Action~~");~~") in 2014 through Ordinance 04-14; and

WHEREAS, the City integrated the Hawk Property (Lakepointe Urban Village) Subarea Plan into the Covington Comprehensive Plan in 2014 (Ordinance 02-14); and

WHEREAS, the City annexed two parcels associated with the Lakepointe Urban Village Subarea in January 2016 (Ordinance 01-2016); and

WHEREAS, the City approved a Development Agreement for the Lakepointe Urban Village Subarea in February 2017 ("2017 Development Agreement", Ordinance No. 02-2017); and

WHEREAS, the City found the 2017 Development Agreement to be consistent with the Planned Action Ordinance 04-14 and the City issued two addenda to the 2013 Planned Action EIS addressing the 2017

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Development Agreement and 2013 Planned Action EIS clarifications and corrections on March 24, 2017 and April 11, 2017; and

WHEREAS, in 2018, Oakpointe Land Covington, LLC, a Delaware limited liability company (aka Oakpointe), submitted a Comprehensive Plan docket application, known as the Lakepointe 2018 Proposal (LA18-0002), which was authorized for evaluation in May 2018 by the City Council; such docket application proposal would amend language in the Comprehensive Plan related to the maximum development threshold that could be allowed within the Lakepointe Urban Village Subarea. Approval of these proposed Comprehensive Plan amendments would replace the existing threshold limits in the Comprehensive Plan with the following limits: 1,750 housing units, 1.32 million square feet of commercial development, and 2,900 Jobs respectively; and

WHEREAS, the City of Covington directed the preparation of a Supplemental Environmental Impact Statement (SEIS) to address the Lakepointe 2018 Proposal and as a result, a Draft SEIS was issued February 2, 2021 and the Final SEIS was issued May 28, 2021; and

WHEREAS, the 2013 FEIS, as addended in 2017 and supplemented by the 2021 SEIS (collectively the "Planned Action EIS") , identifies the impacts and mitigation measures associated with planned development in the Planned Action Area as identified in the Covington Comprehensive Plan, the Lakepointe 2018 Proposal, and the 2017 Development Agreement; and

WHEREAS, adopting a Planned Action for the ~~Hawk Property~~Lakepointe Urban Village Subarea with appropriate standards and procedures will help achieve efficient permit processing and promote environmental quality protection; and

WHEREAS, the City has adopted development regulations and ordinances that will help protect the environment and will adopt regulations to guide the allocation, form, and quality of development on the ~~Hawk Property~~Lakepointe Urban Village Subarea; and

WHEREAS, the City Council finds that adopting this Ordinance is in the public interest and will advance the public health, safety, and welfare;

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF COVINGTON, WASHINGTON DOES HEREBY ORDAIN AS FOLLOWS:

Section I. *Purpose*. The purpose of this Ordinance is to amend Ordinance No. 04-14:

A. Combine environmental analysis, land use plans, development regulations, and City codes and ordinances together with the mitigation measures in the Planned Action EIS to mitigate environmental impacts and process Planned Action development applications in the Planned Action Area;

B. ~~Designate~~Recognize the ~~Hawk Property subarea~~Lakepointe Urban Village Subarea shown in Exhibit A has been previously designated as a Planned Action Area for purposes of environmental review and permitting of designated Planned Action Projects pursuant RCW 43.21C.440;

C. Determine that the Planned Action EIS defined in recitals meets the requirements of a planned action EIS pursuant to SEPA;

D. Establish criteria and procedures for the designation of certain projects within the Planned Action Area as "Planned Action Projects" consistent with RCW 43.21C.440;

E. Provide clear definition as to what constitutes a Planned Action Project within the Planned Action Area, the criteria for Planned Action Project approval, and how development project applications that qualify as Planned Action Projects will be processed by the City;

F. Streamline and expedite the land use permit review process by relying on the Planned Action EIS; and

G. Apply applicable regulations within the City's development regulations and the mitigation framework contained in this Ordinance for the processing of Planned Action Project applications and to incorporate the applicable mitigation measures into the underlying project permit conditions in order to address the impacts of future development contemplated by this Ordinance.

Section II. *Findings*. The City Council finds as follows:

A. The Recitals above are adopted herein as Findings of the City Council.

B. The City is subject to the requirements of the GMA.

C. The City has adopted a Comprehensive Plan complying with the GMA and ~~is amending~~amended the Comprehensive Plan to incorporate text and policies specific to the ~~Hawk Property~~Lakepointe Urban Village Subarea.

~~**D.** The City is adopting zoning and development regulations concurrent with the Hawk Property Subarea Plan to implement said Plan, including this Ordinance.~~

D. The City adopted zoning and development regulations concurrent with the Hawk Property (Lakepointe Urban Village) Subarea Plan to implement said Plan in 2014, including Ordinance No. 03-14. The City subsequently integrated the Hawk Property (Lakepointe Urban Village) Subarea Plan policies and vision into the Comprehensive Plan in 2016 and adopted a Development Agreement in 2017 addressing zoning and development regulations applicable to the Lakepointe Urban Village Subarea. As part of the Lakepointe 2018 Proposal evaluation, the City is further amending the Comprehensive Plan, and adopting this Planned Action Ordinance to amend Ordinance 04-14 to implement the updated vision for development in the subarea and address environmental mitigation. The Lakepointe 2018 Proposal evaluation in the Planned Action EIS identifies future amendments for the Development Agreement to be consistent and allow for the Lakepointe 2018 Proposal. This amended Planned Action Ordinance imposes mitigation measures.

E. The Planned Action EIS adequately identifies and addresses the probable significant environmental impacts associated with the type and amount of development planned to occur in the designated Planned Action Area.

F. The mitigation measures identified in the Planned Action EIS, attached to this Ordinance as Exhibit B and incorporated herein by reference, together with adopted City development regulations are adequate to mitigate significant adverse impacts from development within the Planned Action Area.

G. The ~~Hawk Property Subarea~~Covington Comprehensive Plan and Planned Action EIS identify the location, type, and amount of development that is contemplated by the Planned Action.

H. Future projects that are implemented consistent with the Planned Action will protect the environment, benefit the public, and enhance economic development.

I. The City provided several opportunities for meaningful public involvement and review in the Hawk Property ~~Subarea Plan~~(Lakepointe Urban Village) Subarea Plan, Comprehensive Plan Update, Lakepointe Development Agreement, Lakepointe Annexation, Lakepointe 2018 Proposal, and Planned Action EIS processes, including a community meeting consistent with RCW 43.21C.440; has considered all comments received; and, as appropriate, has modified the proposal or mitigation measures in response to comments.

J. Essential public facilities as defined in RCW 36.70A.200 are excluded from the Planned Action as designated herein and are not eligible for review or permitting as Planned Action Projects unless they are accessory to or part of a project that otherwise qualifies as a Planned Action Project.

K. The designated Planned Action Area is located entirely within ~~a UGA~~an Urban Growth Area.

L. Implementation of the mitigation measures identified in the Planned Action EIS will provide for adequate public services and facilities to serve the proposed Planned Action Area.

Section III. ***Procedures and Criteria for Evaluating and Determining Planned Action Projects within the Planned Action Area.***

A. Planned Action Area. This "Planned Action" designation shall apply to the area shown in Exhibit A of this Ordinance.

B. Environmental Document. A Planned Action Project determination for a site-specific project application within the Planned Action Area shall be based on the environmental analysis contained in the Planned Action EIS. The mitigation measures contained in Exhibit B of this Ordinance are based upon the findings of the Planned Action EIS and shall, along with adopted City regulations, provide the framework the City will use to apply appropriate conditions on qualifying Planned Action Projects within the Planned Action Area.

C. Planned Action Project Designated. Land uses and activities described in the Planned Action EIS, subject to the thresholds described in Subsection III.D of this Ordinance and the mitigation measures contained in Exhibit B of this Ordinance, are designated "Planned Action Projects" pursuant to RCW 43.21C.440. A development application for a site-specific project located within the Planned Action Area shall be designated a Planned Action Project if it meets the criteria set forth in Subsection III.D of this Ordinance and all other applicable laws, codes, development regulations, and standards of the City, including this Ordinance, are met.

D. Planned Action Qualifications. The following thresholds shall be used to determine if a site-specific development proposed within the Planned Action Area was contemplated as a Planned Action Project and has had its environmental impacts evaluated in the Planned Action EIS:

(1) Qualifying Land Uses.

(a) Planned Action Categories: The following general categories/types of land uses are defined in the ~~Hawk Property Subarea Plan~~Comprehensive Plan Land Use Element as applicable to the Lakepointe Urban Village Subarea and can qualify as Planned Actions:

i. Single Family dwelling units

ii. Townhome dwelling units

iii. Multi-family dwelling units

iv. ~~Commercial~~Commercial, including, but not limited to office, hotel, and assisted living

v. Large Format Retail

vi. Iconic/Local Retail

vii. Open Space, Parks, Plazas, Trails, Gathering Spaces

viii. Park and Ride

ix. Uses allowed in the zones implementing the Lakepointe Urban Village Subarea designation

(b) Planned Action Project Land Uses: A primary land use can qualify as a Planned Action Project land use when:

i. it is within the Planned Action Area as shown in Exhibit A of this Ordinance;

ii. it is within one or more of the land use categories described in Subsection III.D(1)(a) above; and

iii. it is listed in development regulations applicable to the zoning classifications applied to properties within the Planned Action Area.

A Planned Action Project may be a single Planned Action land use or a combination of Planned Action land uses together in a mixed-use development. Planned Action land uses may include accessory uses.

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(c) Public Services: The following public services, infrastructure, and utilities can also qualify as Planned Actions: onsite roads, utilities, parks, trails, and similar facilities developed consistent with the Planned Action EIS mitigation measures, City and special district design standards, critical area regulations, and the Covington Municipal Code.

(2) Development Thresholds:

(a) Land Use: The following thresholds of new land uses are ~~contemplated by the Planned Action:~~evaluated in the Planned Action EIS and represent maximum development thresholds. The Maximum Urban Village Proposal 2013 remains in effect until such time as the applicable Development Agreement is amended to address the Lakepointe 2018 Proposal.

Feature	~~Minimum~~Maximum Urban Village Proposal: 2013	~~Maximum Urban Village~~Lakepointe 2018 Proposal
Residential Dwellings (units)	1,~~000~~500	1,~~500~~750
Commercial Square Feet	~~680~~850,000	~~850~~1,320,000

(b) Shifting development amounts between land uses ~~in~~ identified in Subsection III.D(2)(a) may be permitted when the total build-out is less than the aggregate amount of development reviewed in the Planned Action EIS; the traffic trips for the preferred alternative are not exceeded; and, the development impacts identified in the Planned Action EIS are mitigated consistent with Exhibit B of this Ordinance.

(c) Further environmental review may be required pursuant to WAC 197-11-172, if any individual Planned Action Project or combination of Planned Action Projects exceeds the development thresholds specified in this Ordinance and/or alter the assumptions and analysis in the Planned Action EIS.

(3) Transportation Thresholds:

(a) Trip Ranges & Thresholds. The number of new PM peak hour trips anticipated in the Planned Action Area and reviewed in the Planned Action EIS for 2035 is as follows:

PM PEAK HOUR TRIPS

	Alternative 2 – Minimum Urban Village				Alternative 3 – Maximum Urban Village			
		PM Peak Hour				PM Peak Hour		
	Daily	In	Out	Total	Daily	In	Out	Total
Primary Trips	21,950	1,025	940	1,965	28,270	1,343	1,235	2,578

Source: Heffron Transportation, April 2013.

(b) Concurrency. All Planned Action Projects shall meet the transportation concurrency requirements and the Level of Service (LOS) thresholds established in Chapter 12.100 CMC, Transportation Concurrency Management, and Chapter 12.110, Intersection Standards.

(c) Traffic Impact Mitigation. Traffic impact fees shall be paid consistent with Chapter ~~12.105~~19.30 CMC. Transportation mitigation shall also be provided consistent with mitigation measures in Exhibit B, Attachment B-1 of this Ordinance, and the calculation of additional transportation mitigation fees per PM peak hour trip in Exhibit ~~D~~S of ~~this~~the Development Agreement Ordinance~~, attached hereto and~~ No. 02-2017, incorporated by this reference.

(d) The responsible City official shall require documentation by Planned Action Project applicants demonstrating that the total trips identified in Subsection III.D(3)(a) are not exceeded, that the project meets the concurrency and intersection standards of Subsection III.D(3)(b), and that the project has mitigated impacts consistent with Subsection III.D (3)(c).

(e) Discretion.

i. The responsible City official shall have discretion to determine incremental and total trip generation, consistent with the Institute of Traffic Engineers (ITE) Trip Generation Manual and method used in subsection (c) above to calculate impact fees. If there is a new ITE manual (latest edition) or an alternative manual ~~accepted by,~~ the City's Public Works Director ~~at his or her~~shall have sole discretion~~,~~ to require or accept its use for each project permit application proposed under this Planned Action.

ii. The responsible City official shall have discretion to condition Planned Action Project applications to meet the provisions of this Planned Action Ordinance and the Covington Municipal Code.

iii. The responsible City official shall have the discretion to adjust the allocation of responsibility for required improvements between individual Planned Action Projects based upon their identified impacts.

iv. Planned action applications will provide information consistent with section (3)(d). Recognizing the hypothetical land use analysis and trips in the Lakepointe 2018 Proposal are dependent on the mix of the uses in the Planned Action EIS, and that the City has reserved 2,578 trips in a Trip Bank for the Lakepointe Urban Village Subarea, concurrency applications will be processed as follows: Concurrency applications for planned action projects generating up to 2,493 PM Peak Hour trips shall provide only a trip generation calculation and the City's review shall be limited to confirming the number of trips generated and adding them to the trip ledger for Lakepointe Urban Village Subarea. For any planned action project that reaches 97% of the total trips, or 2,493 trips, the City reserves the right to require supplemental concurrency application materials and evaluation beyond the simple trip generation demonstration, and alternative mitigation if conclusions differ from the Planned Action EIS per subsection (5) below.

(4) Elements of the Environment and Degree of Impacts. A proposed project that would result in a significant change in the type or degree of adverse impacts to any element(s) of the environment analyzed in the Planned Action EIS would not qualify as a Planned Action Project.

(5) Changed Conditions. Should environmental conditions change significantly from those analyzed in the Planned Action EIS, the City's SEPA Responsible Official may determine that the Planned Action Project designation is no longer applicable until supplemental environmental review is conducted.

E. Planned Action Project Review Criteria.

(1) The City's SEPA Responsible Official, or authorized representative, may designate as a Planned Action Project, pursuant to RCW 43.21C.440 and WAC 197-11-172(1) and (2), a project application that meets all of the following conditions:

(a) the project is located within the Planned Action Area identified in Exhibit A of this Ordinance;

(b) the proposed uses and activities are consistent with those described in the Planned Action EIS and Subsection III.D of this Ordinance;

(c) the project is within the Planned Action thresholds and other criteria of Subsection III.D of this Ordinance;

(d) the project is consistent with the Covington Comprehensive Plan including the policies of the Hawk Property (Lakepointe Urban Village) Subarea Plan incorporated into the Comprehensive Plan and the

regulations of the Hawk Property (Lakepointe Urban Village) Subarea Plan integrated into the Covington Municipal Code and any applicable Development Agreement;

(e) the project's significant adverse environmental impacts have been identified in the Planned Action EIS;

(f) the project's significant impacts have been mitigated by application of the measures identified in Exhibit B of this Ordinance and other applicable City regulations, together with any conditions, modifications, variances, or special permits that may be required;

(g) the project complies with all applicable local, state and/or federal laws and regulations and the SEPA Responsible Official determines that these constitute adequate mitigation; and

(h) the project is not an essential public facility as defined by RCW 36.70A.200, unless the essential public facility is accessory to or part of a development that is designated as a Planned Action Project under this Ordinance.

(2) The City shall base its decision to qualify a project as a Planned Action Project on review of the Subarea SEPA Checklist form included in Exhibit B to this Ordinance and review of the Planned Action Project submittal and supporting documentation, provided on City required forms.

F. Effect of Planned Action Designation.

(1) Designation as a Planned Action Project by the City's SEPA Responsible Official means that a qualifying project application has been reviewed in accordance with this Ordinance and found to be consistent with the development parameters and thresholds established herein and with the environmental analysis contained in the Planned Action EIS.

(2) Upon determination by the City's SEPA Responsible Official that the project application meets the criteria of Subsection III.D and qualifies as a Planned Action Project, the project shall not require a SEPA threshold determination, preparation of an EIS, or be subject to further review pursuant to SEPA. Planned Action Projects will still be subject to all other applicable City, state, and federal regulatory requirements. The Planned Action Project designation shall not excuse a project from meeting the City's code and ordinance requirements apart from the SEPA process.

G. Planned Action Project Permit Process. ~~Applications~~ During permit review of a development permit application submitted to the City, the City shall determine whether the proposed project ~~for~~ qualifies~~cation~~ as a Planned Action Project ~~shall be reviewed pursuant to the~~and shall use the following process:

(1) Development applications shall meet all applicable requirements of the Covington Municipal Code and this Ordinance ~~in place at the time of the Planned Action Project application~~. Development permit applications that seek to qualify as Planned Action Projects shall not vest to regulations required to protect public health and safety.

(2) Applications for development permits seeking to qualify as Planned Action Projects shall:

(a) be made on forms provided by the City, including a form requesting a Planned Action Determination;

(b) include the Subarea SEPA checklist included in Exhibit B of this Ordinance;

(c) include a conceptual site plan pursuant to Subsection III.G(3) of this Ordinance; and

(d) meet all applicable requirements of the Covington Municipal Code and this Ordinance.

(3) A conceptual site plan shall be submitted for development permit applications seeking to qualify as ~~proposed~~ Planned Action Projects. The purpose of the conceptual site plan process is to assess overall project concepts and phasing as well as to review how the major project elements work together to implement requirements of this Ordinance, the consistency of the ~~Planned Action Project~~development permit application with Planned Action EIS alternative concept plans included in Exhibit ~~E~~D of this Ordinance attached hereto and incorporated

by this reference, the Covington Comprehensive Plan, the Hawk Property (Lakepointe Urban Village) Subarea Plan, the Covington Municipal Code, and the City of Covington Design and Construction standards. The conceptual site plan shall contain and/or identify:

(a) Name of proposed project;

(b) Date, scale, and north arrow oriented to the top of the paper/plan sheet;

(c) Drawing of the subject property with all property lines dimensioned and names of adjacent streets;

(d) A legend listing all of the following information on one of the sheets:

- Total square footage of the site
- Square footage of each individual building and/or use
- Total estimated square footage of all buildings (including footprint of each building)
- Percentage estimate of the total lot covered by buildings and by total impervious area
- Square footage estimate of all landscaping (total and parking lots)
- Allowable and proposed building height
- Building setbacks proposed and required by the CMC
- Parking analysis, including estimated number, size, and type of stalls required, by use; and number of stalls provided by use;

(e) Phasing of development;

(f) Major access points and access to public streets, vehicle and pedestrian circulation, public transit stops;

(g) Critical areas;

(h) Focal points within the project (e.g., public plazas, art work, wayfinding signage, gateways both into the site and into the city, etc.);

(i) Private and public open space provisions and recreation areas; and

(j) Written summary of how the conceptual site plan meets the requirements of this Ordinance and the Hawk Property (Lakepointe Urban Village) Subarea Plan as well as relevant Covington Municipal Code requirements. The written summary shall also identify the consistency of the Planned Action Project application with Planned Action EIS alternative concept plans included in Exhibit ~~E~~D of this Ordinance.

(4) The development permit application shall be processed for completeness pursuant to Title 14 CMC except that the Subarea SEPA checklist shall be accepted in place of the checklist required by CMC 14.35.020. The City's SEPA Responsible Official ~~shall determine whether the application is complete and~~ shall review the application to determine if it is consistent with and meets all of the criteria for qualification as a Planned Action Project as set forth in this Ordinance.

(5) (a) If the City's SEPA Responsible Official determines that a proposed project qualifies as a Planned Action Project, ~~he/she~~they shall issue a "Determination of Consistency," and no SEPA threshold determination, EIS, or additional SEPA review shall be required pursuant to RCW 43.21C.440(3)(b).

(b) As required by WAC 197-11-172(3), public notice for projects that qualify as planned actions shall be tied to the underlying permit. If notice is otherwise required for the Planned Action Project under Title 14 CMC, the notice shall state the project has qualified as a planned action and been issued a Determination of Consistency. If notice is not otherwise required for the Planned Action Project, notice of the Determination of Consistency shall be mailed or otherwise verifiably delivered ~~said Determination~~ to the applicant, ~~;~~ the owner

of the property as listed on the application~~,~~; and federally recognized tribal governments and agencies with jurisdiction over the Planned Action Project~~,~~ pursuant to RCW 43.21.440(3)(b).~~Chapter 1, Laws of 2012 (Engrossed Substitute Senate Bill (ESSB) 6406).~~

~~(b) Upon issuance of the Determination of Consistency, the review of the underlying project permit(s) shall proceed in accordance with the applicable permit review procedures specified in Title 14 CMC, except that no SEPA threshold determination, EIS, or additional SEPA review shall be required~~.

(c) The Determination of Consistency shall remain valid and in effect as long as the underlying project application approval is also in effect.

~~(d) All other p~~Public notice and review for qualified Planned Action Projects shall be tied to the underlying project permit(s). If notice is otherwise required for the underlying permit(s) decision, the notice of decision shall state that the project qualifies as a Planned Action Project. If notice is not otherwise required for the underlying project permit(s) decision, no special notice is required by this Ordinance.

(6) (a) If the City's SEPA Responsible Official determines that a proposed project does not qualify as a Planned Action Project, ~~he/she~~they shall issue a "Determination of Inconsistency" and shall mail or otherwise verifiably deliver said Determination of Inconsistency to the applicant and~~;~~ the owner of the property as listed on the application.~~;~~ ~~and federally recognized tribal governments and agencies with jurisdiction over the Planned Action Project, pursuant to Chapter 1, Laws of 2012 (Engrossed Substitute Senate Bill (ESSB) 6406).~~RCW ~~43.21C.440~~.

(b) The Determination of Inconsistency shall describe the elements of the Planned Action Project application that result in failure to qualify as a Planned Action Project.

(c) Upon issuance of the Determination of Inconsistency, the City's SEPA Responsible Official shall prescribe a SEPA review procedure for the non-qualifying project that is consistent with the City's SEPA regulations and the requirements of state law.

(d) A project that fails to qualify as a Planned Action Project may incorporate or otherwise use relevant elements of the Planned Action EIS, as well as other relevant SEPA documents, to meet the non-qualifying project's SEPA requirements. The City's SEPA Responsible Official may limit the scope of SEPA review for the non-qualifying project to those issues and environmental impacts not previously addressed in the Planned Action EIS.

(7) To provide additional certainty about applicable requirements, the City ~~or~~and applicant ~~may request consideration and execution of~~have executed a development agreement for a Planned Action Project, consistent with RCW 36.70B.170 et seq. and CMC Chapter 18.114, Development Agreements.

(8) As required by RCW 43.21C.440, the Determination of Consistency or Inconsistency is subject to the type of administrative appeal, if any, that the City provides for the Planned Action Project underlying permit type itself ~~A Determination of Consistency or Inconsistency is a Type 1 land use decision~~ and may be appealed pursuant to the procedures established in Title 14 CMC. An appeal ~~of a Determination of Consistency~~ shall be consolidation with any pre-decision or appeal hearing on the underlying project application.

Section IV. *Monitoring and Review*.

A. The City should monitor the progress of development in the designated Planned Action area as deemed appropriate to ensure that it is consistent with the assumptions of this Ordinance and the Planned Action EIS regarding the type and amount of development and associated impacts and with the mitigation measures and improvements planned for the Planned Action Area.

B. This Planned Action Ordinance shall be reviewed by the SEPA Responsible Official no later than five (5) years from its effective date in conjunction with the City's regular Comprehensive Plan review cycle, or annual amendment docket process, as applicable. The timing of subsequent reviews after the first review shall be determined with the completion of the first review. The review shall determine the continuing relevance of the Planned Action assumptions and findings with respect to environmental conditions in the Planned Action Area, the

impacts of development, and required mitigation measures (Exhibit B) and Public Agency Actions and Commitments (Exhibit C). Based upon this review, the City may propose amendments to this Ordinance or may supplement or revise the Planned Action EIS.

Section V. *Conflict*. In the event of a conflict between this Ordinance or any mitigation measures imposed thereto, and any ordinance or regulation of the City, the provisions of this Ordinance shall control.

Section VI. *Severability*. If any one or more sections, subsections, or sentences of this Ordinance are held to be unconstitutional or invalid such decision shall not affect the validity of the remaining portions of this Ordinance and the same shall remain in full force and effect.

Section VII. *Effective Date*. This Ordinance shall take effect and be in force ~~ten (10~~five (5) days after publication as provided by law.

Passed by the City Council of the City of Covington the ~~11th~~_____ day of ~~February, 2014~~_____, 2021.

Mayor ~~Margaret Harto~~Jeff Wagner

ATTESTED:

PUBLISHED: ~~February XX, 2014~~XXX, 2021

EFFECTIVE: ~~February XX, 2013~~XXX, 2021

~~Sharon Scott~~Joan Michaud, City Clerk

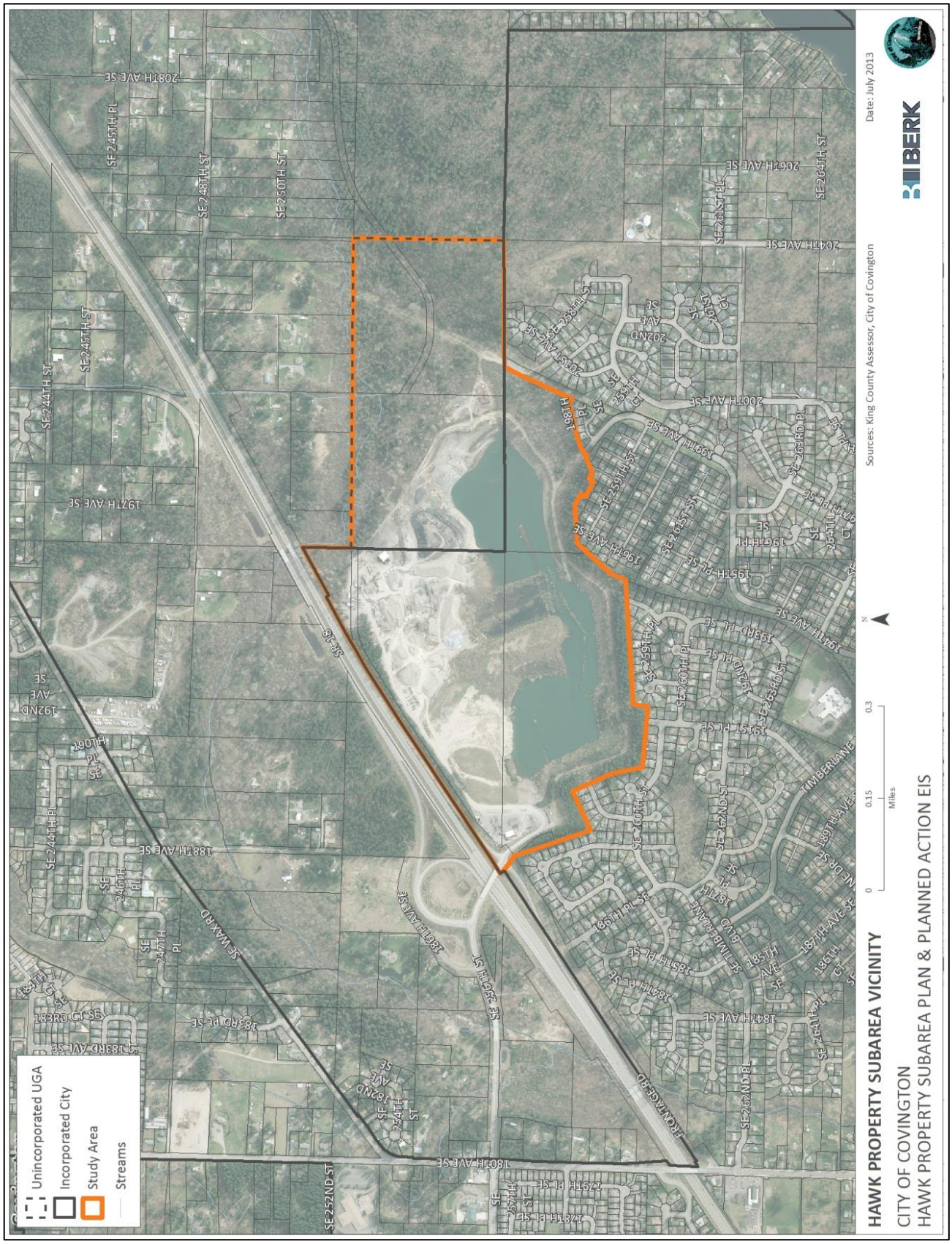
APPROVED AS TO FORM:

~~Sara Springer~~Mark Orthmann, City Attorney

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EXHIBIT A

~~HAWK PROPERTY~~LAKEPOINTE URBAN VILLAGE SUBAREA PLANNED ACTION AREA




King County Parks
Lakepointe Urban Village Subarea
(aka Hawk Property)
Lakepointe Urban Village
Streams/Creeks (Location Approximate)
City Limits
UGA (Urban Growth Area)
1 inch = 300 feet
Aerial Imagery from King County 2017
covington
growing towards greatness

Exhibit B
~~Hawk Property~~Lakepointe Urban Village Subarea SEPA Checklist and Mitigation Document

INTRODUCTION

The State Environmental Policy Act (SEPA) requires environmental review for project and non-project proposals that are likely to have adverse impacts upon the environment. In order to meet SEPA requirements, the City of Covington issued the Planned Action EIS for the ~~Hawk Property~~Lakepointe Urban Village Subarea, as defined in this ~~Hawk Property~~Lakepointe Urban Village Subarea Planned Action Ordinance ("Ordinance") in which this Exhibit is attached. The Planned Action EIS has identified significant beneficial and adverse impacts that are anticipated to occur with the future development of the Planned Action Area, together with a number of possible measures to mitigate those significant adverse impacts.

The City of Covington has established a Planned Action designation for the ~~Hawk Property~~Lakepointe Urban Village Subarea based on the Planned Action EIS (see **Exhibit A**). SEPA Rules indicate review of a Planned Action Project is intended to be simpler and more focused than for other projects (WAC 197-11-172). This **Exhibit B** provides a modified checklist form for Planned Action Project applicants to complete, as provided pursuant to RCW 43.21C.440.

MITIGATION DOCUMENT

A Mitigation Document is provided in **Attachment B-1** to this Exhibit B~~,~~ and is also summarized in the environmental checklist. **Attachment B-1** establishes specific mitigation measures, based upon significant adverse impacts identified in the Planned Action EIS. These mitigation measures shall apply to future development proposals which are found consistent with the Planned Action thresholds in Subsection III.D of this Ordinance and the conceptual plans in Exhibit ~~E~~D of this Ordinance, and which are located within the Planned Action Area (see **Exhibit A**).

APPLICABLE PLANS AND REGULATIONS

The Planned Action EIS identifies specific regulations that act as mitigation measures. These are summarized by EIS topic in **Attachment B-2** to this Exhibit B and are advisory to applicants. All applicable federal, state, and local regulations shall apply to Planned Action Projects, including the regulations that are adopted with the ~~Hawk Property Subarea Plan.~~Lakepointe Urban Village Subarea Development Agreement and the applicable elements of the Covington Municipal Code. Planned Action Project applicants shall comply with all adopted regulations where applicable, including those listed in the Planned Action EIS and those not included in the Planned Action EIS.

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INSTRUCTIONS TO APPLICANTS

This environmental checklist below asks you to describe some basic information about your proposal. The City will use this checklist to determine whether the project is consistent with the analysis in the Hawk Property Planned Action EIS and qualifies as a Planned Action Project~~,~~ or would otherwise require additional environmental review under SEPA. Answer the questions briefly, with the most precise information known, or give the best description you can. You must answer each question accurately and carefully, to the best of your knowledge. The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The City may ask you to explain your answers or provide additional information.

A. PROPOSAL DESCRIPTION

Date:			
Applicant:	Name/Company:	Phone #:	Cell #:
	Mailing Address:	Email Address:	
Property Owner:	Name/Company:	Phone #:	Cell #:
	Mailing Address:	Email Address:	
Property Address	Street:	City, State, Zip Code:	
Parcel Information	Assessor Parcel Number:	Property Size in Acres:	
Give a brief, complete description of your proposal.			

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Property Zoning	Zoning District Name:		Building Type:
Permits Requested (list all that apply)	◻ Land Use: _____ ◻ Building: _____		◻ Engineering: _____ ◻ Other: _____
	All Applications Deemed Complete? Yes __ No __ Explain:		
	Are there pending governmental approvals of other proposals directly affecting the property covered by your proposal? Yes __ No __ Explain:		
Existing Land Use	Describe Existing Uses on the Site:		
Proposed Land Use – Check and Circle All That Apply	◻ Single Family dwelling units, including subdivisions ◻ Townhome dwelling units ◻ Multi-family dwelling units ◻ ~~Commercial~~Commercial, including but not limited to: office, hotel, and assisted living		◻ Large Format Retail ◻ Iconic/Local Retail ◻ Open Space, Parks, Plazas, Trails, Gathering Spaces ◻ Roads, Utilities, or Park and Ride
Dwellings	# Existing Dwelling Units: #____ Dwelling Type _____ #____ Dwelling Type _____	# Proposed Dwelling Units: #____ Type _____ #____ Type _____	Proposed Density (du/ac):
	Dwelling Threshold Total in Ordinance: 1,~~000 to 1,500~~750		Dwelling Bank Remainder as of _____20__ _____dwellings
Non-residential Uses: Building Square Feet	Existing Square Feet:		Proposed Square Feet:
	Employment Square Feet in Ordinance: ~~680,000 to 850~~1,320,000 square feet Type of Employment: ◻ Large Format Retail Square Feet _____SF ◻ Iconic/Local Retail _____SF ◻ Commercial Office _____SF ◻ Other (describe): _____SF		Square Feet Remainder as of _____20__ _____ square feet
Building Height	~~Existing Stories: _____~~ ~~Existing Height in feet:~~		Proposed Stories: Proposed Height in feet:
Parking Spaces	Existing:		Proposed:
PM Peak Hour Weekday Vehicle Trips	Existing Estimated Trips Total:	Future Estimated Trips Total:	Net New Trips:
	Maximum net new primary PM peak hour trips in Ordinance: 1,965 to 2,578		Trip Bank Remainder as of _____20__ _____dwellings

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	Source of Trip Rate: ITE Manual ___ Other ____	Transportation Impacts Determined Consistent with Ordinance Subsection III.D(3): Yes ____ No ____
Impervious Surfaces	Existing Square Feet or Acres:	Proposed Square Feet or Acres:
Proposed timing or schedule (including phasing).		
Describe plans for future additions, expansion, or further activity related to this proposal.		
List any available or pending environmental information directly related to this proposal.		

B. ENVIRONMENTAL CHECKLIST AND MITIGATION MEASURES

Earth Checklist and Mitigation Measures	
1. Description of Conditions A. General description of the site (circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____ B. What is the steepest slope on the site (approximate percent slope)? _____ C. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? _____ _____	**STAFF COMMENTS:**
2. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.	
3. Has any part of the site been classified as a "geologically hazardous" area? (Check all that apply) □ Landslide Hazards □ Erosion Hazards □ Seismic Hazards □ Liquefaction Hazards	

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◻ Other: _____ Describe:	
4. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.	
5. Proposed Measures to control impacts to earth, soils, and geologic hazardous areas: THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY): ◻ Site Specific Geotechnical Study ◻ Ground improvement and foundation support requirements ◻ Temporary Erosion and Sedimentation Control (TESC) measures and Best Management Practices to control erosion as required under the NPDES construction permit ◻ Other: _____	

Surface Water and Groundwater Resources Checklist	
6. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type of surface water body, including their name(s), stream classification, and whether there is a 100-year floodplain. If appropriate, state what stream or river the surface water body flows into.	**STAFF COMMENTS:**
7. Will the proposal require or result in (check all that apply and describe below): ◻ any work over, in, or adjacent to (within 200 feet) the described waters? ◻ fill and dredge material that would be placed in or removed from surface water or wetlands? ◻ surface water withdrawals or diversions? ◻ discharges of waste materials to surface waters? ◻ groundwater withdrawal or discharge? ◻ waste materials entering ground or surface waters? Describe:	

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8. Describe the source of runoff (including storm water) and method of collection, treatment, and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.	
9. Is the area designated a critical aquifer recharge area? **Yes, located within that Category I or II critical aquifer recharge area subject to CMC 18.65.311 -.316** If so, please describe~~:~~ consistency with CMC 18.65.311-.316	
~~9.~~10. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?	
~~10.~~11. What measures are proposed to reduce or control water resources/stormwater impacts? THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY): □ Low Impact Development (LID) techniques □ Stormwater Manual Basic Water Quality menu □ Stormwater Manual Enhanced Basic Water Quality menu □ Stormwater Infiltration and pretreatment □ Construction refueling containment measures □ Wells decommissioned or property constructed □ Best Management Practices (BMP) Plan □ Native species landscaping □ Demonstrate compliance with the 2008 City of Kent Draft Water System Plan Chapter 8: Wellhead Protection Program Other: _____	

Air Quality/GHG Checklist and Mitigation Measures	
~~11.~~12. What types of emissions to the air would result from the proposal a) during construction and b) when the project is completed? Please describe and give quantities if known.	**STAFF COMMENTS:**
~~12.~~13. What measures are proposed to reduce or control air emissions?	

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THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY): □ Air Quality Control Plans □ Puget Sound Clean Air Agency Approval of Burning Slash □ Greenhouse Gas Reduction Measures □ Other: _____ Explain how additional mitigation and Greenhouse Gas Reduction Measures are incorporated into the project, and which measures are not incorporated and why they are infeasible~~:~~ (See Attachment B-1, Mitigation Measures 20, 21):	

Plants and Animals Checklist and Mitigation Measures

Plants and Habitat Checklist	STAFF COMMENTS:
~~13.~~14. Check or circle types of vegetation found on the site: □ Deciduous tree: Alder, maple, aspen, other _____ □ Evergreen tree: Fir, cedar, pine, other □ Shrubs □ Grass □ Pasture □ Crop or grain □ Wet soil plants: Cattail, buttercup, bullrush, skunk cabbage, other □ Water plants: Water lily, eelgrass, milfoil, other _____ □ Other types of vegetation: _____	
~~14.~~15. Are there wetlands or wetland buffers on the property? Please describe their acreage and classification.	
~~15.~~16. Is there riparian habitat on the property?	
~~16.~~17. What kind and amount of vegetation will be removed or altered?	
~~17.~~18. List threatened or endangered species known to be on or near the site.	

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~~18.~~19. Is the proposal consistent with critical area regulations? Please describe.	
~~19.~~20. Proposed landscaping, use of native plants, buffers, or other measures to preserve or enhance vegetation on the site: THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY): □ Water quality □ LID stormwater practices □ Critical area protection/avoidance □ Buffers consistent with regulations and placed in tract □ Native landscaping □ A long-term stewardship program for natural open spaces and critical areas □ Other: _____ Describe:	**STAFF COMMENTS:**
Fish and Wildlife	
~~20.~~21. Circle any birds and animals which have been observed on or near the site or are known to be on or near the site: □ Birds: Hawk, heron, eagle, songbirds, other: _____ □ Mammals: Deer, bear, elk, beaver, other: _____ □ Fish: Bass, salmon, trout, herring, shellfish, other: _____	
~~21.~~22. List any threatened or endangered species known to be on or near the site.	
~~22.~~23. Is the proposal consistent with standard critical area buffers? Please describe.	

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~~23.~~24. Proposed measures to preserve or enhance fish and wildlife, if any: THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY): □ Native landscaping retained and added □ Wildlife crossing □ Critical area protection/avoidance □ Other: _____ Describe:	

Noise Checklist and Mitigation Measures	
~~24.~~25. What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?	**STAFF COMMENTS:**
~~25.~~26. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.	
THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY): □ Chapter 8.20 of the Covington Municipal Code, Noise Control □ Washington State Noise Control Act of 1974 (WAC 173-60) □ Noise control plans □ Construction noise reduction measures □ Noise field measurements □ Appropriate site design. For example, based on the Planned Action EIS analysis, with a 35-foot minimum setback to residential buildings or residential outdoor use areas, the modeled traffic noise levels at new dwellings would be less than the impact criteria. □ Building materials and design (e.g. double pane windows) if exterior noise levels exceed local, state, or federal thresholds as studied in the Planned Action EIS. □ Traffic Noise Abatement □ Other: _____ Describe:	

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Land Use Checklist	
~~26.~~27. What is the current use of the site and adjacent properties? (Add more explanation as needed beyond description in Part A.)	**STAFF COMMENTS:**
~~27.~~28. Describe any structures on the site. Will any structures be demolished? If so, what type, dwelling units, square feet?	
~~28.~~29. What is the current comprehensive plan designation of the site? Lakepointe Urban Village Subarea	
~~29.~~30. What is the current zoning classification of the site?	
~~30.~~31. If applicable, what is the current shoreline master program designation of the site?	
~~31.~~32. What is the planned use of the site? List type of use, number of dwelling units and building square feet.	
~~32.~~33. What is the tallest height of any proposed structure(s)?	
~~33.~~34. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any. THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY): □ Consistency with ~~Hawk Property Subarea~~Comprehensive Plan as described below □ Development Agreement Exhibit P Design Standards to improve land use compatibility (e.g. privacy and light and glare) □ Other: _____ Describe these measures and how they are incorporated into the development:	

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Transportation Checklist	
~~34.~~35. Identify public streets and highways serving the site~~,~~ and describe proposed access to the existing street system. Show on site plans, if any.	**STAFF COMMENTS:** Verify that: □ The Planned Action Project applicant has submitted documentation of the trips, required improvements, impact fees and other mitigation in comparison to the Planned Action EIS and the Planned Action Ordinance. □ The City has verified incremental and total trip generation.
~~35.~~36. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?	
~~36.~~37. How many parking spaces would the completed project have? How many would the project eliminate?	
~~37.~~38. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).	
~~38.~~39. How many PM peak hour vehicular trips per day would be generated by the completed project? Attach appropriate documentation.	
~~39.~~40. Proposed measures to reduce or control transportation impacts, if any: THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY): □ Trips in Ordinance Subsection III.D(3)(a) are not exceeded, the project meets the Concurrency and Intersection Standards of Subsection III.D(3)(b), and that the project has mitigated impacts consistent with Subsection III.D (3)(c). □ Installation of required improvements necessitated by development or that are part of Planned Action (e.g. spine road and associated intersection improvements). □ Fair share contribution to improvements at City concurrency intersections and roads. □ Other measures to reduce or control transportation impacts: _____ Describe:	

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Public Services and Utilities Checklist			
~~40.~~41. Police Protection: Would the project increase demand for police services? Can City levels of service be met?			**STAFF COMMENTS:**
~~41.~~42. Fire and Emergency Services: Would the project increase demand for fire and/or emergency services? Can levels of services be met?			
~~42.~~43. Schools: Would the project result in an increase in demand for school services? Can levels of services be met? Is an impact fee required?			
~~43.~~44. Parks and Recreation: Would the project require an increase in demand for parks and recreation? Can levels of services be met? Are parks and trails provided consistent with the Planned Action EIS Alternatives? Is an impact fee required?			
~~44.~~45. Water Supply: Would the project result in an increased need for water supply or fire flow pressure? Can levels of service be met?			
~~45.~~46. Wastewater: Would the project result in an increased need for wastewater services? Can levels of service be met?			
~~46.~~47. Other Public Services and Utilities: Would the project require an increase in demand for other services and utilities? Can levels of services be met?			
48.	□ RCMU zone – minimum two ½ acre gathering places required □ # of Residential dwelling units _____ # SFR DU _____ # MF DU ○ SFR units require 450 square feet per unit ○ MF or Townhouse units at a density greater than 8 du/acre require 100 square feet	Total required On-site Recreation Space : _____ SF Describe how this requirement is being met:	

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~~47.~~49. Proposed measures to reduce or control direct impacts on public services. THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY): □ Police Services: Adequate levels of service available to serve development (verified by levels of service studied in the Planned Action EIS and City contract with King County Sheriff Office). Services are available consistent with City standards and the Development Agreement. Implement CPTED principles. Provide substation per Development Agreement. Voluntary payment of police training has been provided per Mitigation Measure 39.A. □ Fire Services: Mitigation agreement between the developer and Kent Regional Fire Authority and payment of impact fees including those established in CMC 19.50. □ Parks and Recreation: Park space and trails are provided to be consistent with both the LOS standards of the Parks and Recreation Element of the Comprehensive Plan and with the requirements of CMC 18.35.150 and this Planned Action Ordinance~~.~~ and Development Agreement. Payment of impact fees as required by CMC Chapter 19.60. □ Water and Wastewater: Adequate service at the time of development. □ Other Measures to reduce or control public services and utilities impacts:_____ Describe:	

ADDITIONAL ENVIRONMENTAL TOPICS

Historic and Cultural Preservation	
~~48.~~50. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.	**STAFF COMMENTS:**
~~49.~~51. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.	
~~50.~~52. Proposed measures to reduce or control impacts to historic or cultural resources, if any: THE APPLICATION INCLUDES MITIGATION MEASURES AS REQUIRED IN ATTACHMENT B-1 MITIGATION REQUIRED FOR DEVELOPMENT APPLICATIONS, AND ATTACHMENT B-2 APPLICABLE REGULATIONS AND COMMITMENTS, INCLUDING ALL RELEVANT CITY PLANS AND CODES IN EFFECT AT THE TIME OF APPLICATION (CHECK ALL THAT APPLY): □ Condition to stop construction if remains of historic or archeological significance are found. □ Consultation with the Washington State Department of Archaeology and Historic Preservation. □ Where project is proposed on or immediately surrounding a site containing an archaeological resource a study is conducted by a qualified professional archaeologist Describe:	

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C. APPLICANT SIGNATURE

I DECLARE UNDER PENALTY OF THE PERJURY LAWS THAT THE INFORMATION I HAVE PROVIDED ON THIS FORM/APPLICATION IS TRUE CORRECT AND COMPLETE. I UNDERSTAND THAT THE LEAD AGENCY IS RELYING ON THEM TO MAKE ITS DECISION.

Signature:	
Date:	

D. REVIEW CRITERIA

Review Criteria

The City's SEPA Responsible Official may designate Planned Action Projects consistent with Subsection III.E of this Ordinance, if all of the following criteria are met.

Criteria	Describe how your application and proposed development meets the criteria.
(a) The proposal is located within the Planned Action area identified in Exhibit A.	
(b) The proposed uses and densities are consistent with those described in the Planned Action EIS and Subsection III.D of this Ordinance.	
(c) The proposal is within the Planned Action thresholds and other criteria of Subsection III.D of this Ordinance.	
(d) The proposal is consistent with the ~~Hawk Property Subarea Plan and the~~ Covington Comprehensive Plan.	
(e) The proposal's significant adverse environmental impacts were identified in the Planned Action EIS.	

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Criteria	Describe how your application and proposed development meets the criteria.
(f) The proposal's significant adverse impacts have been mitigated by the application of the measures identified in this Exhibit B, Subsection III.D of this Ordinance, and other applicable city regulations, together with any modifications or variances or special permits that may be required.	
(g) The proposal complies with all applicable local, state, and/or federal laws and regulations and the SEPA Responsible Official determines that these constitute adequate mitigation.	
(h) The proposal is not an essential public facility as defined by RCW 36.70A.200(1) unless an essential public facility is accessory to or part of a development that is designated a Planned Action Project under Subsection III.E of this Ordinance.	

Determination Criteria

Applications for Planned Actions Projects shall be reviewed pursuant to the process in Subsection III.G of this Ordinance.

Requirement	Staff Comments
Applications for Planned Action Projects shall be made on forms provided by the City and shall include the Subarea SEPA checklist included in this Exhibit B.	
A conceptual site plan consistent with Subsection III.G(3) of this Ordinance demonstrates how the Planned Action Project is consistent with the overall site plan and Planned Action EIS conceptual alternatives in Exhibit ~~E~~D of this Ordinance.	
The application has been deemed complete in accordance with Title 14 CMC, Planning and Development.	
The application is for a project within the Planned Action Area defined in Exhibit A of this Ordinance.	
The proposed use(s) are listed in Subsection III.D of this Ordinance and qualify as a Planned Action.	

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E. SEPA RESPONSIBLE OFFICIAL DETERMINATION

A. Determination of Consistency - Qualifies as a Planned Action Project: The application is consistent with the criteria set forth in this ~~Hawk Property~~Lakepointe Urban Village Subarea Planned Action Ordinance and has been determined to qualify as a Planned Action Project.

The project and underlying permit(s) review shall proceed in accordance with the applicable permit review procedures specified within Title 14 CMC, Planning and Development, except that no SEPA threshold determination, EIS, or additional SEPA review shall be required.

Notice of the Planned Action Determination of Consistency shall be made according to the notice requirements of the underlying project permit(s) pursuant to Title 14 CMC, Planning and Development. If notice is not otherwise required for the underlying project permit(s), no special notice is required.

SEPA Responsible Official Signature:	
Date:	

B. Determination of Inconsistency - Does not Qualify as Planned Action Project: The application is not consistent with the criteria set forth in this ~~Hawk Property~~Lakepointe Urban Village Subarea Planned Action Ordinance and has been determined to not qualify as a Planned Action Project for the following reasons:

_____

_____

_____

Projects that fail to qualify as Planned Action Projects may incorporate or otherwise use relevant elements of the Planned Action EIS, as well as other relevant SEPA documents, to meet their SEPA requirements. The SEPA Responsible Official may limit the scope of SEPA review for the non-qualifying project to those issues and environmental impacts not previously addressed in the Planned Action EIS.

SEPA Process Prescribed: _____

SEPA Responsible Official Signature:	
Date:	

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ATTACHMENT B-1

Mitigation Required for Development Applications

INTRODUCTION

The Planned Action EIS has identified significant beneficial and adverse impacts that are anticipated to occur with the future development of the Planned Action Area, together with a number of possible measures to mitigate those significant adverse impacts. Please see Final EIS Chapter 1 Summary for a description of impacts, mitigation measures, and significant unavoidable adverse impacts.

A Mitigation Document is provided in this **Attachment B-1** to establish specific mitigation measures based upon significant adverse impacts identified in the Planned Action EIS. The mitigation measures in this **Attachment B-1** shall apply to Planned Action Project applications that are consistent with the Preferred Alternative range reviewed in the Planned Action EIS and which are located within the Planned Action Area (see **Exhibit A**).

Where a mitigation measure includes the words "shall" or "will," inclusion of that measure in Planned Action Project application plans is mandatory in order to qualify as a Planned Action Project. Where "should" or "would" appear, the mitigation measure may be considered by the project applicant as a source of additional mitigation, as feasible or necessary, to ensure that a project qualifies as a Planned Action Project. Unless stated specifically otherwise, the mitigation measures that require preparation of plans, conduct of studies, construction of improvements, conduct of maintenance activities, etc., are the responsibility of the applicant or designee to fund and/or perform.

Any and all references to decisions to be made or actions to be taken by the City's SEPA Responsible Official may also be performed by the City's SEPA Responsible Official's authorized designee.

MITIGATION MEASURES

No.	Topic and Mitigation Measure
	Earth
1.	GEOLOGIC HAZARDS The City shall condition Planned Action Projects to be consistent with City codes and to limit impacts from geologic hazards and provide sufficient foundation support. • Specific foundation support systems to be used for onsite improvements will be determined as part of the specific design and permitting of infrastructure and individual buildings associated with future site development. • Site-specific studies and evaluations shall be conducted in accordance with Covington Municipal Code requirements and the provisions of the ~~2012~~2015 International Building Code (IBC) or current version in effect at the time of development application. • Mitigation measures to limit impacts from geologic hazards and associated foundation support considerations shall be identified in the site-specific ~~study.~~ geotechnical study that will be conducted prior to building permit application.

No.	Topic and Mitigation Measure
2.	STEEP SLOPES / LANDSLIDES The City shall condition Planned Action Projects to be consistent with City codes and to limit impacts regarding slope stability. • Development adjacent to steep slopes shall require site-specific slope stability analyses prior to construction (CMC, Sections 18.65.~~280 and 18.65.310).~~ 250 and 18.65.300). This type of analysis is typically included in the report that documents the site-specific geotechnical study that is conducted. • If post reclamation slopes are assessed and found to require stabilization near any future structure, action shall be taken to mitigate slope instability concerns during the design and permitting for those structures. • Mitigation measures shall be incorporated based on the findings of the site-specific ~~slope stability~~geotechnical analyses, and may include but are not limited to retaining walls, structure setbacks, buttresses, and cutting and filling to establish flatter grades.
3.	EROSION The City shall condition Planned Action Projects to be consistent with City codes and to limit erosion impacts. • During construction, contractors shall employ Temporary Erosion and Sedimentation Control (TESC) measures and Best Management Practices (BMPs) to control erosion as required under the National Pollutant Discharge Elimination System (NPDES) construction permit. These measures shall be consistent with the City of Covington critical area and grading regulations (CMC, Chapter 18.~~60~~65 and Section 18.65.~~220).~~270) in place at time of development application. • City conditions on Planned Action Projects to limit erosion impacts may include, but are not limited to, the following: ○ Minimize areas of exposure. ○ Schedule earthwork during drier times of the year (May 1st to September 30th). ○ Retain vegetation where possible. ○ Seed or plant appropriate vegetation on exposed areas as soon as earthwork is completed. ○ Route surface water through temporary drainage channels around and away from disturbed soils or exposed slopes. ○ Use silt fences, temporary sedimentation ponds, or other suitable sedimentation control devices to collect and retain possible eroded material. ○ Cover exposed soil stockpiles with plastic sheeting and exposed slopes with mulching, blankets, or plastic sheeting, as appropriate. ○ Intercept and drain water from any surface seeps, if encountered. ○ Incorporate contract provisions allowing temporary cessation of work under certain, limited circumstances, if weather conditions warrant.
4.	LIQUEFACTION The City shall condition Planned Action Projects to be consistent with City codes and to limit potential liquefaction impacts.

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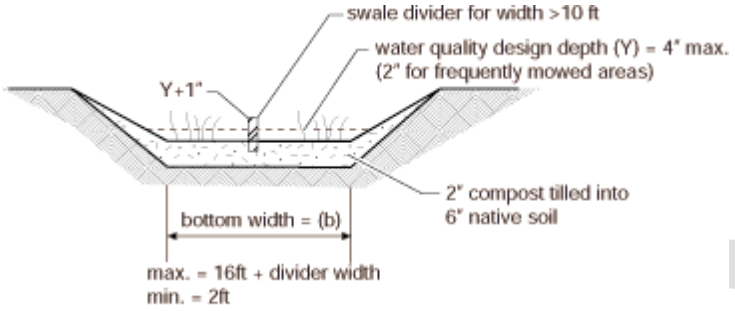
No.	Topic and Mitigation Measure
	• At the time of application, Planned Action Projects shall demonstrate the completed reclamation has implemented high quality, well-compacted crushed rock or gravel fill material during reclamation to significantly reduce the potential for soil liquefaction. • Ground improvement and foundation support requirements shall be determined as part of the design and permit approval process for each future onsite development project. The site~~ ~~-specific ~~evaluation~~geotechnical study by a licensed ~~geotechnical~~ engineer shall identify additional techniques to reduce liquefaction impacts. Several methods of ground improvement are available, including stone columns, vibro-compaction, vibro-replacement, deep soil mixing, compaction grouting, and others. Selection of the appropriate deep foundation or ground improvement technique is location-specific at the site and would depend on a number of factors that would be considered during design and permitting of the future structures.
5.	STRUCTURE SETTLEMENT UNDER STATIC LOADS At the time of application, Planned Action Projects shall demonstrate to the City's SEPA Responsible Official's satisfaction that the completed reclamation has implemented high quality, well-compacted crushed rock or gravel fill material to reduce the potential for future structure settlement. • Site structures will require a site-specific geotechnical ~~studies~~study by a licensed geotechnical engineer in order to design appropriate foundation systems under the City's building permit process. • Although not associated with a specific environmental hazard, structure settlement shall be mitigated during the design and permitting for individual future structures. For multi-story structures, total and differential settlements could be accommodated by founding the structures on deep foundations or by implementing ground improvement techniques. Soil preloading/surcharging could likely be used to reduce total and differential settlements to within tolerable levels for utilities and single-story structures. Alternatively, lightly loaded structures could potentially be founded on mat foundations with flexible utility connections that would limit the potential adverse effect of differential settlement. Deep foundation options include driven piles and drilled shafts.
	Surface Water Resources
6.	STORMWATER QUALITY: BASIC WATER QUALITY MENU Planned Action Projects shall avoid or minimize direct discharge to surface water bodies as required by the City's SEPA Responsible Official. • As required, Planned Action Projects shall accomplish, at a minimum, water quality treatment using the Basic Water Quality menu from ~~2012~~2014 Stormwater Management Manual for Western Washington, or the manual in effect at the time of development applications; at the City's SEPA Responsible Official's discretion, the Enhanced Water Quality menu in Mitigation Measure 7 herein may instead be employed to minimize potential water quality impacts of Planned Action development. • The goal of this treatment is to remove 80% of total suspended solids (TSS) for influent concentrations that are greater than 100 mg/l, but less than 200 mg/l. Ecology encourages the design and operation of treatment facilities that engage a bypass at flow rates higher than the water quality design flow rate as long as the reduction in TSS loading exceeds that achieved with initiating bypass at the water quality design flow rate. There are several options for the basic water quality menu, and a biofiltration swale is the most likely option to be implemented due to its cost effectiveness and aesthetics to satisfy the basic water quality protection requirement. Biofilters are vegetated treatment systems (typically grass) that

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No.	Topic and Mitigation Measure

remove pollutants by means of sedimentation, filtration, soil absorption, and/or plant uptake. They are typically configured as swales or flat filter strips and designed to remove low concentrations and quantities of TSS, heavy metals, petroleum hydrocarbons, and/or nutrients from stormwater (SMMWW 2012). A biofilter can be used as a basic treatment BMP for contaminated stormwater runoff from roadways, driveways, parking lots, and highly impervious ultra-urban areas, or as the first stage of a treatment train. In cases where hydrocarbons, high TSS, or debris would be present in the runoff, such as high-use sites, a pretreatment system for those components would be necessary. Diagram B-1.1. below shows the typical swale section (SMMWW 2012).

Diagram B-1.1. Typical Swale Section



7. STORMWATER QUALITY: ENHANCED BASIC WATER QUALITY MENU

Consistent with the 2012 Stormwater Management Manual for Western Washington, or the manual in effect at the time of development applications, where the development is more intensive, such as a park and ride, commercial, and multifamily areas, or when required by the City's SEPA Responsible Official to reduce water quality impacts of any type of Planned Action Project pursuant to Mitigation Measure 6 herein, the Enhanced Basic Water Quality menu shall be applied to this project site, where an enhanced level of treatment is required for those development sites or portions thereof that generate the highest concentrations of metals in stormwater runoff.

- Based on a review of dissolved metals removal of basic treatment options, a "higher rate of removal" is currently defined as greater than 30% dissolved copper removal and greater than 60% dissolved zinc removal. For the enhanced treatment menu, there are a couple options that will satisfy the enhanced treatment requirements, such as: infiltration, large sand filter, stormwater treatment wetland, compost-amended vegetated filter strip, two facility treatment trains, bioretention, media filter drain, and emerging stormwater treatment technologies.

Groundwater Resources

8. REFUELING AND SECONDARY CONTAINMENT

During site construction, equipment refueling shall be located in a specific designated location and include secondary containment in the event of a spill, including spill kits and associated equipment.

- Fuel storage shall not occur on-site during construction.
- In the event of an on-site spill, contractors shall provide notification to the Washington State Department of Ecology, the City of Covington, and City of Kent, identifying that the spill area is located adjacent to an aquifer protection area.

No.	Topic and Mitigation Measure
9.	INFILTRATION Potential impacts due to reduced recharge shall be mitigated by stormwater detention and infiltration design and construction considerations per Surface Water Resources Mitigation Measures 6 and 7 herein. • Site soils are well drained and suitable for infiltration; infiltration shall be required with pretreatment of stormwater inflows. • Given the potential creation of impervious area on the site, natural recharge from critical areas and the pond shall be protected, such as through the use of stormwater infiltration methods, which could significantly reduce potential impacts due to loss of groundwater recharge. • Following the 2012 Stormwater Manual, or the manual in effect at the time of development application, stormwater designs for the sub-area shall be optimized by separating roof runoff from other pollution-generating impervious surfaces.
9A.	DEWATERING Upon completion of pond construction, the dewatering pump shall be shut down no sooner than October 1st of that year and in equal increments for four months, to allow the stream discharge to equilibrate. The City shall assure compliance through final inspection of the grading permit, that the pond was completed as designed, and dewatering completed as required.
10.	SIGNAGE To increase public awareness, the applicant shall post signage in appropriate locations in the development stating, "protect groundwater, it's the water you drink," or equivalent language. These signs should be placed adjacent to any stormwater facility with infiltration or overflow to the pond or critical areas.
11.	WELL DECOMMISSIONING Any abandoned wells on the site shall be decommissioned consistent with requirements from the Washington State Department of Ecology. If retained, Planned Action Projects shall demonstrate that existing wells, properly constructed with sanitary seals and steel casing, would not pose significant adverse risks to groundwater resources.
12.	AUTO RELATED USES AND BMP PLAN A Best Management Practices (BMPs) Plan shall be developed for the entire property by the Planned Action Project applicant, especially addressing planned fueling areas, gas stations, and any associated automotive services, to protect groundwater resources.
13.	NO NET LOSS OF RECHARGE Stormwater management facilities shall be designed by the Planned Action Project applicant to maintain a no net loss of recharge to the aquifer. All stormwater shall be treated appropriately to the satisfaction of the City's SEPA Responsible Official to avoid any potential degradation to groundwater resources.
14.	LANDSCAPE MANAGEMENT AND WATER CONSERVATION Any landscaping associated with Planned Action Projects shall consist of native species to reduce the potential use of pesticide/fertilizer application. Native vegetation shall be incorporated to promote water conservation, as these species require less irrigation.

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No.	Topic and Mitigation Measure
15.	CONSULTATION – WELLHEAD PROTECTION Planned Action Project applicants shall demonstrate that the applicant has consulted with the City of Kent regarding compliance with the 2008 City of Kent Draft Water System Plan Chapter 8: Wellhead Protection Program, as it applies to a portion of the ~~Hawk Property~~Lakepointe Urban Village Subarea, to the satisfaction of the City's SEPA Responsible Official.
	Air Quality
16.	CONSTRUCTION EMISSION CONTROL The City shall require all Planned Action Project construction contractors to implement air quality control plans for construction activities in the Planned Action Area. • The air quality control plans, specific to dust control, shall commit the Planned Action Project construction crews to implement all reasonable control measures described in the *Associated General Contractors of Washington's Guide to Handling Fugitive Dust from Construction Projects.* Copies of that guidance document are distributed by the Puget Sound Clean Air Agency (PSCAA). • The air quality control plans shall include the following BMPs to control fugitive dust and odors emitted by diesel construction equipment. ○ Use water sprays or other non-toxic dust control methods on unpaved roadways. ○ Minimize vehicle speed while traveling on unpaved surfaces. ○ Prevent track-out of mud onto public streets. ○ Cover soil piles when practical. ○ Minimize work during periods of high winds when practical.
17.	CONSTRUCTION TAILPIPE EMISSIONS The following mitigation measures shall be used by Planned Action Project construction contractors to minimize air quality and odor issues caused by tailpipe emissions: • Maintain the engines of construction equipment according to manufacturers' specifications. • Minimize idling of equipment while the equipment is not in use.
18.	HAUL TRAFFIC SCHEDULING If there is heavy traffic during some periods of the day, Planned Action Project construction contractors shall schedule haul traffic during off-peak times that would have the least effect on traffic and would minimize indirect increases in traffic related emissions.
19.	SLASH OR DEMOLITION DEBRIS Burning of slash or demolition debris shall not be permitted by Planned Action Project construction contractors without express approval from PSCAA.
20.	GREENHOUSE GAS REDUCTION MEASURES The City shall require Planned Action Project applicants to implement additional trip-reduction measures and energy conservation measures in Planned Action Projects to reduce greenhouse gas (GHG) emissions. The City shall require Planned Action Project applicants to evaluate the GHG reduction measures shown in Table B-1.1 below for their projects and to document, to the satisfaction of the City's SEPA Responsible Official, which measures are incorporated and which measures are infeasible and not incorporated.

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No.	Topic and Mitigation Measure

Table B-1.1 below lists a variety of mitigation measures that could reduce GHG emissions caused by transportation facilities, building construction, space heating, and electricity usage (Ecology 2008b) and where the emission reductions might occur.

Table B-1.1. Potential Greenhouse Gas Reduction Mitigation Measures

Reduction Measures	Comments
Site Design	
Retain and enhance vegetated open spaces.	Retains or increases sequestration by plants.
Plant trees and vegetation near structures to shade buildings.	Reduces on-site fuel combustion emissions and purchased electricity, and enhances carbon sinks.
Minimize building footprint.	Reduces on-site fuel combustion emissions and purchased electricity consumption, materials used, maintenance, land disturbance, and direct construction emissions.
Design water efficient landscaping.	Minimizes water consumption, purchased energy, and upstream emissions from water management.
Minimize energy use through building orientation.	Reduces on-site fuel combustion emissions and purchased electricity consumption.
Building Design and Operations	
Apply LEED standards (or equivalent) for design and operations.	Reduces on-site fuel combustion emissions and off-site/indirect purchased electricity, water use, waste disposal.
Purchase Energy Star equipment and appliances for public agency use.	Reduces on-site fuel combustion emissions and purchased electricity consumption.
Incorporate on-site renewable energy production, including installation of photovoltaic cells or other solar options.	Reduces on-site fuel combustion emissions and purchased electricity consumption.
Design street lights to use energy-efficient bulbs and fixtures.	Reduces purchased electricity.
Construct “green roofs” and use high-albedo roofing materials.	Reduces on-site fuel combustion emissions and purchased electricity consumption.
Install high-efficiency HVAC systems.	Minimizes fuel combustion and purchased electricity consumption.
Eliminate or reduce use of refrigerants in HVAC systems.	Reduces fugitive emissions. Compare refrigerant usage before/after to determine GHG reduction.
Maximize interior day lighting through floor plates, increased building perimeter and use of skylights, ~~celestories~~clerestories’, and light wells.	Increases natural/day lighting initiatives and reduces purchased electrical energy consumption.
Incorporate energy efficiency technology such as super insulation motion sensors for lighting and climate-control-efficient, directed exterior lighting.	Reduces fuel combustion and purchased electricity consumption.
Use water-conserving fixtures that surpass building code requirements.	Reduces water consumption.
Reuse gray water and/or collect and reuse rainwater.	Reduces water consumption with its indirect upstream electricity requirements.
Use recycled building materials and products.	Reduces extraction of purchased materials, possibly reduces transportation of materials, encourages recycling and reduction of solid waste disposal.
Use building materials that are extracted and/or manufactured within the region.	Reduces transportation of purchased materials.
Use rapidly renewable building materials.	Reduces emissions from extraction of purchased materials.

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No.	Topic and Mitigation Measure	
	Conduct third-party building commissioning to ensure energy performance.	Reduces fuel combustion and purchased electricity consumption.
	Track energy performance of building and develop strategy to maintain efficiency.	Reduces fuel combustion and purchased electricity consumption.
	Transportation	
	Size parking capacity to not exceed local parking requirements and, where possible, seek reductions in parking supply through special permits or waivers.	Reduced parking discourages auto-dependent travel, encouraging alternative modes such as transit, walking, and biking. Reduces direct and indirect VMT.
	Develop and implement a marketing/information program that includes posting and distribution of ridesharing/transit information.	Reduces direct and indirect VMT.
	Subsidize transit passes. Reduce employee trips during peak periods through alternative work schedules, telecommuting, and/or flex time. Provide a guaranteed-ride-home program.	Reduces employee VMT.
	Provide bicycle storage and showers/changing rooms.	Reduces employee VMT.
	Use traffic signalization and coordination to improve traffic flow and support pedestrian and bicycle safety.	Reduces transportation emissions and VMT.
	Apply advanced technology systems and management strategies to improve operational efficiency of local streets.	Reduces emissions from transportation by minimizing idling and maximizing transportation routes/systems for fuel efficiency.
	Develop shuttle systems around business district parking garages to reduce congestion and create shorter commutes.	Reduces idling fuel emissions and direct and indirect VMT.
	Source: Ecology 2008b LEED = Leadership in Energy and Environmental Design; HVAC = heating, ventilation, and air-conditioning	

21. ADDITIONAL GREENHOUSE GAS REDUCTION MEASURES

The City shall require Planned Action Project applicants to evaluate the reduction measures shown in Table B-1.2 below for their projects and to document, to the satisfaction of the City's SEPA Responsible official, which measures are incorporated and which measures are infeasible and not incorporated.

Table B-1.2 lists the emission reduction measures developed by Sacramento Metropolitan Air Quality Management District (SMAQMD 2010). The Table lists SMAQMD's estimated "mitigation points" value, where each point value corresponds to the percent reduction in emissions. For example, a mitigation point value of 1.0 corresponds to a 1% reduction in land-use-related emissions. SMAQMD developed this Table to quantify reductions in criteria pollutant emissions, but the listed measures would also generally reduce GHG emissions. These mitigation points are for informational purposes only to demonstrate to the applicant and the City's SEPA Responsible Official which measures have the potential to reduce emissions more than other measures.

Table B-1.2 SMAQMD Recommended Measures for Land Use Emission Reductions

Measure Number	Title	Description	Mitigation Points (% Reduction in Emissions)
Bicycle/Pedestrian/Transit Measures			
a.	Bike parking	Non-residential projects provide plentiful short-term and long-term bicycle parking facilities to meet peak season maximum demand.	0.625

b.	End of trip facilities	Non-residential projects provide "end-of-trip" facilities including showers, lockers, and changing space.	0.625
c.	Bike parking at multi-unit residential	Long-term bicycle parking is provided at apartment complexes or condominiums without garages.	0.625
d.	Proximity to bike path/bike lanes	Entire project is located within 1/2 mile of an existing bike lane and project design includes a comparable network that connects the project uses to the existing offsite facility.	0.625
e.	Pedestrian network	The project provides a pedestrian access network that internally links all uses and connects to all existing or planned external streets and pedestrian facilities contiguous with the subarea.	1.0
f.	Pedestrian barriers minimized	Site design and building placement minimize barriers to pedestrian access and interconnectivity. Physical barriers such as walls, berms, landscaping, and slopes between residential and non-residential uses that impede bicycle or pedestrian circulation are eliminated.	1.0
g.	Bus shelter for existing transit service	Bus or Streetcar service provides headways of one hour or less for stops within 1/4 mile; project provides safe and convenient bicycle/pedestrian access to transit stop(s) and provides essential transit stop improvements (i.e., shelters, route information, benches, and lighting).	0.25-1.0
h.	Bus shelter for planned transit service	Project provides transit stops with safe and convenient bicycle/pedestrian access. Project provides essential transit stop improvements (i.e., shelters, route information, benches, and lighting) in anticipation of future transit service.	0.25
i.	Traffic calming	Project design includes pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements. Roadways are designed to reduce motor vehicle speeds and encourage pedestrian and bicycle trips by featuring traffic calming features.	0.25-1.0
Parking Measures			
j.	Paid parking	Employee and/or customer paid parking system	1.0-7.2
k.	Parking cash out	Employer provides employees with a choice of forgoing subsidized parking for a cash payment equivalent to the cost of the parking space to the employer.	0.6-4.5
l.	Minimum parking	Provide minimum amount of parking required. Special review of parking required.	0.1-6.0
m.	Parking reduction beyond code	Provide parking reduction less than code. Special review of parking required. Recommend a Shared Parking strategy.	0.1-12
n.	Pedestrian pathway through parking	Provide a parking lot design that includes clearly marked and shaded pedestrian pathways between transit facilities and building entrances.	0.5
o.	Off street parking	Parking facilities are not adjacent to street frontage.	0.1-1.5
Site Design Measures			
p.	Office/Mixed-use density	Project provides high density office or mixed-use proximate to transit.	0.1-2.0
q.	Orientation to existing transit, bikeway, or pedestrian corridor	Project is oriented towards existing transit, bicycle, or pedestrian corridor. Setback distance is minimized.	0.5

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r.	Orientation toward planned transit, bikeway, or pedestrian corridor	Project is oriented towards planned transit, bicycle, or pedestrian corridor. Setback distance is minimized.	0.25
s.	Residential density	Project provides high-density residential development.	1.0-12
t.	Street grid	Multiple and direct street routing (grid style).	1.0
u.	Neighborhood electric vehicle access	Make physical development consistent with requirements for neighborhood electric vehicles.	0.5-1.5
v.	Affordable housing component	Residential development projects of 5 or more dwelling units provide a deed-restricted low-income housing component on-site.	0.6-4.0
Mixed-use Measures			
w.	Urban mixed-use	Development of projects predominantly characterized by properties on which various uses, such as office, commercial, institutional, and residential, are combined in a single building or on a single site in an integrated development project with functional interrelationships and a coherent physical design.	3.0-9.0
x.	Suburban mixed-use	Have at least three of the following on site and/or offsite within ¼ mile: Residential Development, Retail Development, Park, Open Space, or Office.	3.0
y.	Other mixed-use	All residential units are within ¼ mile of parks, schools or other civic uses.	1.0
Building Component Measures			
z.	No fireplace	Project does not feature fireplaces or wood burning stoves.	1.0
aa.	Reserved for future measure		
bb.	Energy Star roof	Install Energy Star labeled roof materials.	0.5-1.0
cc.	Onsite renewable energy system	Project provides onsite renewable energy system(s).	1.0-3.0
dd.	Solar orientation	Orient 75 or more percent of homes and/or buildings to face either north or south (within 30 degrees of N/S).	0.5
ee.	Non-roof surfaces	Provide shade (within 5 years) and/or use light-colored/high-albedo materials (reflectance of at least 0.3) and/or open grid pavement for at least 30% of the site's non-roof impervious surfaces, including parking lots, walkways, plazas, etc.; OR place a minimum of 50% of parking spaces underground or covered by structured parking; OR use an open-grid pavement system (less than 50% impervious) for a minimum of 50% of the parking lot area. Unshaded parking lot areas, driveways, fire lanes, and other paved areas have a minimum albedo of.3 or greater.	1.0
ff.	Green roof	Install a vegetated roof that covers at least 50% of roof area.	0.5

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No.	Topic and Mitigation Measure			
	TDM and Miscellaneous Measures			
	gg.	Transportation Management Association membership	Include permanent TMA membership and funding requirement. Funding to be provided by non-revocable funding mechanism.	5.0
	hh.	Electric lawnmower	Provide a complimentary electric lawnmower to each residential buyer.	1.0
	ii.	Other	Other proposed strategies, in consultation City of Covington and other agencies with expertise.	To Be Determined
	Source: SMAQMD, 2010			
	Plants and Animals			
22.	WATER QUALITY AND BASE FLOW In addition to the mitigation measures identified in the Surface Water and Groundwater sections herein, Planned Action Projects shall be implement the following to avoid aquatic habitat degradation: • Runoff shall be captured, treated, and, where feasible, infiltrated to prevent poor water quality spikes. Untreated urban runoff contains metals and polycyclic aromatic hydrocarbons (PAHs), which has been shown to adversely affect salmon, particularly Coho salmon (Feist, B. et al 2011; McIntyre, J. et al. 2012). • To further reduce impacts to base flow and salmonids, the City shall limit impervious surface increases based on zoning standards. • Planned Action Projects shall follow the 2012 Ecology Stormwater Manual, including LID practices, or successor manual in effect at the time of the development application.			
23.	CRITICAL AREAS—RIPARIAN CORRIDOR/WETLAND Consistent with Planned Action EIS Alternatives illustrated in Exhibit ~~E~~D of this Ordinance, Planned Action Project applicants shall demonstrate that the riparian corridor, including Jenkins Creek and associated wetlands, are retained and, where appropriate, enhanced and that the Planned Action Project is consistent with adopted critical area regulations. • To further protect the wetland/riparian corridor, critical areas shall be put under a protective easement or non-buildable tract, dedicated to the City or a conservation organization approved by the City. • Planned Action Project applicants shall demonstrate consistency with Hawk Property Subarea Plan policies to minimize tree removal in critical areas and their buffers for the purposes of trails, utility corridors, and similar infrastructure through application of mitigation sequencing and consistency with critical area regulation standards. New utilities shall follow the ~~204th Avenue SE~~Covington Connector road alignment to the extent feasible. • Once the baseline impacts necessary for construction of the arterial street, trails, and other infrastructure, such as utilities, are determined, the modified buffer shall be placed in an easement or a non-buildable tract, dedicated to the City or a conservation organization approved by the City, to effectively protect it in perpetuity and to prevent future incremental impacts as adjacent land is developed. The non-buildable tract shall be recorded with King County and dedicated to the City of Covington or an approved conservation group. Additional buffer protection shall be provided by applying the wider King County buffer to Wetland A (which is contiguous with Jenkins Creek) following annexation.			

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No.	Topic and Mitigation Measure
24.	STEWARDSHIP PROGRAM A stewardship program for natural open spaces and critical areas shall be created by Planned Action Project applicants at the time easements or tracts are approved for the site and prior to development occurring within 500 feet of the onsite critical areas. • The stewardship program shall set forth five-year goals and requirements to be implemented by the Planned Action Project developer and long-term goals for the agency assuming responsibility for the protective easement or non-buildable tracts required in Mitigation Measure 23 herein. Elements such as removing non-native and invasive plants, native revegetation, removing garbage, and trail maintenance shall be included. • The stewardship program shall include stewardship goals and objectives for the care of the Jenkins Creek natural corridor as well as five-year and overall, long-term goals for the ecological health and habitat value of Jenkins Creek and associated wetland and buffer areas. Long-term goals and allowed maintenance practices for critical areas/non-buildable tract(s) shall be incorporated into a vegetation management plan (CMC 18.65.150).
25.	PLANTS A. Upland vegetation removed during construction shall be replaced to the extent possible by Planned Action Project applicants and contractors to the satisfaction of the City's SEPA Responsible Official. B. Public landscaped areas, stormwater bioswales, and other green space areas provided with redevelopment shall be planted by Planned Action Project applicants and contractors with native grasses, groundcovers, trees and shrubs wherever possible to maximize wildlife habitat and minimize needed maintenance, to the satisfaction of the City of Covington SEPA Responsible Official.
26.	STEEP SLOPES AND WETLAND IMPACTS To avoid impacts to steep slopes and wetlands: A. All clearing and grading construction by Planned Action Project contractors shall be in accordance with specific permit conditions, codes, ordinances, and standards applied by the City of Covington or other agencies with jurisdiction. • Temporary sedimentation control measures such as silt fencing shall be installed by Planned Action Project contractors as needed and disturbed soils should be covered with straw, hydroseeded, or otherwise revegetated with sod or native plants as soon after construction as possible. B. As part of any platting or subdivision, or prior to the start of construction, a wetland and stream delineation is required to be prepared by Planned Action Project applicants to the satisfaction of the City's SEPA Responsible Official to precisely map the critical area and quantify any impacts. • This level of detail will be needed to prepare a compensatory mitigation plan. • Based on existing site conditions and current plans, there appears to be more than enough intact forest continuous with the standard buffer that could be expanded as necessary to off-set any buffer losses.

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No.	Topic and Mitigation Measure
27.	WILDLIFE To avoid impacts identified wildlife, Planned Action Projects shall avoid critical areas and buffers through mitigation sequencing, and Planned Action Project applicants shall place buffers in a protected easement or non-buildable tract, dedicated to the City or a conservation organization approved by the City. • The new ~~204th Avenue SE~~Covington Connector shall be planned to bisect as little of the vegetated areas as is practicable. • One ponded mining area will be preserved as an open water feature consistent with conceptual plans in Exhibit ~~E~~D of this Ordinance. Planting native vegetation and installing snags and other habitat features on the pond fringe shall be considered in Planned Action Project landscape plans to enhance the pond area for wildlife. Construction timing restrictions shall be implemented as needed and required to protect priority species. Landscaping and park spaces may incorporate native planting, snags, logs, and other special habitat features to improve habitat functions and values. Preserving and establishing native trees, shrubs, and groundcovers around the perimeter of the open water feature would improve the habitat value of this feature by creating refuge, foraging, and nesting opportunities for wildlife.
28.	INTERPRETIVE SIGNAGE & PET WASTE A. At the time of development, Planned Action Project applicants and contractors shall place interpretive signage along proposed trails and/or within park spaces. Signage shall be designed and installed to educate the public about the functions and values of critical areas and urban habitats. B. Pet waste bags and trash cans shall be installed to help limit water quality impacts. Public park rules or homeowner association rules shall establish leash rules to limit wildlife disturbances.
29.	WILDLIFE CROSSING To reduce habitat fragmentation between the Jenkins Creek corridor and habitat patches to the south and west, a wildlife crossing shall be incorporated into the new arterial street design by Planned Action Project applicants to the satisfaction of the City's SEPA Responsible Official. • A crossing ~~could potentially~~shall be established in the southeast corner of the Planned Action Area, approaching the connection with 204th Avenue~~.~~ (Covington Connector). • ~~In addition to providing safe crossing for elk, a~~IA wildlife corridor could also benefit invertebrates and small mammals that are likely to access the open water feature (Hansen et al. 2005). Even mobile species, such as songbirds, exhibit a preference for travel through wooded corridors compared to open gaps (Desrochers and Hannon 1997). Installed plants will affect frequency of crossing use, the types of wildlife using the crossing, and the direction of wildlife movement leading up to and away from the crossing. Fencing can direct wildlife movement and prevent collisions with vehicles. A planting plan and fencing (or justification for no fencing) shall be a part of the final wildlife crossing plan. The wildlife crossing over or under the Covington Connector shall demonstrate by design on how wildlife will connect to the open space and critical areas. The connection to the trail system shall also be shown.
30.	RECLAMATION COMPLIANCE Prior to completion of reclamation and upon any amendment to the current reclamation permit (e.g. to resize the lake), Planned Action Project applicants shall consult with the lead federal agency regarding compliance with state and federal laws--including the State Hydraulic Code, Sections 401 and 404 of the Clean Water Act, and Section 7 of the Endangered Species Act--and provide documentation of the consultation to the satisfaction of the City's SEPA Responsible Official.

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No.	Topic and Mitigation Measure
	Noise
31.	CONSTRUCTION NOISE ABATEMENT Based on site-specific considerations at the time of construction permit review, the City shall require all Planned Action Project construction contractors to implement noise control plans for daytime construction activities in the study area. See CMC 8.20.020(2)(i). Nighttime construction activities shall not be allowed without a waiver from the City Manager, pursuant to the CMC.
32.	CONSTRUCTION NOISE REDUCTION A. Construction noise shall be reduced by Planned Action Project construction contractors by using enclosures or walls to surround noisy stationary equipment, installing mufflers on engines, substituting quieter equipment or construction methods, minimizing time of operation, and locating equipment as far as practical from sensitive receivers. B. To reduce construction noise at nearby receivers, the following mitigation measures shall be incorporated into construction plans and contractor specifications to the satisfaction of the City's SEPA Responsible Official: • Locate stationary equipment away from receiving properties. • Erect portable noise barriers around loud stationary equipment located near sensitive receivers. • Limit construction activities to between 7:00 a.m. and 8:00 p.m. on weekdays and between 9:00 a.m. and 6:00 p.m. on weekends and holidays to avoid sensitive nighttime hours. • Turn off idling construction equipment. • Require contractors to rigorously maintain all equipment. • Train construction crews to avoid unnecessarily loud actions (e.g., dropping bundles of rebar onto the ground or dragging steel plates across pavement) near noise-sensitive areas (e.g. critical areas, open spaces, residences).
33.	TRAFFIC NOISE MITIGATION The City shall require Planned Action Projects to install noise control measures at the new dwellings along the proposed new section of ~~204th Avenue SE~~the Covington Connector within the development. The Planned Action EIS screening-level traffic noise study indicated the potential for traffic noise impacts at future dwellings to be constructed adjacent to the proposed new section of ~~204th Avenue SE~~the Covington Connector within the Planned Action Area. Noise mitigation measures shall include: • Requiring developers to perform noise field measurements as a condition of engineering approvals once the ultimate roadway alignment, width, and final grade has been designed. • Require developers to conduct site-specific traffic noise studies to confirm the number and location of dwellings that would be impacted by traffic noise. • Appropriate site design, based on the noise study and specific alignment. For example, with a 35-foot minimum setback, the modeled traffic noise levels at new dwellings would be less than the WSDOT's noise guidelines applied as Planned Action EIS impact criteria. • Double-pane glass windows or other building insulation measures designed in accordance with the Washington State Energy Code (4-5-040). These would reduce indoor noise levels, but would not reduce exterior noise at outdoor use areas. • Installation of noise barrier walls to shield outdoor use areas facing the street.
33A.	TRAFFIC NOISE ABATEMENT Due to the proximity of SR 18 and the Covington Connector to the modeled potential hotel and assisted living facility locations, developers shall integrate noise mitigation measures into designs. Potential mitigation measures include the following:

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No.	Topic and Mitigation Measure
	• Review the location of heavily travelled roadways during the design of the facilities. • Orient buildings such that outdoor use areas are located on the sides of buildings away from roadways with high traffic volumes or use walls to protect sensitive outdoor use areas. • Install acoustic windows and/or other building insulation measures to reduce interior sound levels, particularly on the sides of buildings exposed to heavily travelled roadways. • The HUD Noise Guidebook, Chapter 4 (HUD; accessed December 10, 2018), provides additional guidance for how these noise attenuation measures could be incorporated into development near high-traffic roadways including the use of barriers, site planning with buffers and building orientation, and construction methods and materials (HUD 1991). The City may require a traffic noise study if needed to determine appropriate implementation of noise abatement mitigation.
	Transportation
34.	PROJECTS INCLUDED IN PLANNED ACTION A. Planned Action Projects shall demonstrate consistency with Planned Action EIS Action Alternatives ~~2 and 3~~ that include a new 2-to-3-lane arterial between SE 256th Street and SE 272nd Street. • The ~~204th Avenue SE~~Covington Connector is required to be built as part of the redevelopment of the ~~Hawk Property.~~Lakepointe Urban Village Subarea. The ~~204th Avenue SE~~Covington Connector will serve as the spine of the site's internal roadway circulation system, will provide a second major roadway connection to the site from the east, and will also provide an additional emergency vehicle access point. This roadway was included as part of Alternatives 2 and 3 and it was assumed in the Planned Action EIS analysis to be in place in the future transportation analyses for each of these alternatives. • If the Planned Action Project applicant proposes to not implement this connection, or to delay or reduce its extent, the City shall require a supplemental transportation analysis to be completed demonstrating to the City's SEPA Responsible Official's satisfaction that no adverse transportation impacts will result and that all City transportation standards shall be met. B. Planned Action Projects shall demonstrate consistency with Planned Action EIS Alternatives 2 and 3 that include a local roadway connection between 191st Avenue SE and the local internal roadway system at the south end of the Planned Action Area. The local access connection shall be designed with traffic calming measures such as on-street parking, landscaping, and/or devices such as traffic circles to limit access to the local neighborhood and discourage cut-through traffic. • The local roadway connection between 191st Avenue SE is required to be built as part of the redevelopment of the ~~Hawk Property.~~Lakepointe Urban Village Subarea. This local connection was included as part of Alternatives 2 and 3, and it is assumed to be in place in the future transportation analyses for each of these alternatives. The purpose of this roadway is to provide a direct connection between the Planned Action Area and residential development located to the south and to provide an additional emergency vehicle access point. This connection is not intended to serve trips generated outside of the local neighborhood. • If the Planned Action Project applicant proposes to not implement this local connection, the City shall require a supplemental transportation analysis to be completed demonstrating to the City's SEPA Responsible Official's satisfaction that no adverse transportation impacts will result and that all City transportation standards shall be met.

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No.	Topic and Mitigation Measure

35. OTHER ROADWAY CAPACITY IMPROVEMENTS

A. The City's SEPA Responsible Official shall require that Planned Action Projects mitigate transportation impacts by implementing Roadway Capacity Improvements consistent with the Planned Action EIS and this Ordinance. Table B-1.3 below summarizes the roadway capacity improvements that have been identified to mitigate intersection operation impacts of Planned Action EIS Alternatives 2 and 3, along with planning-level estimates of each project's cost.

- For projects that include new lanes or turn-pockets, planning level cost-estimates take into account the length of lane that would be needed to accommodate typical vehicle queues that would occur during the PM peak hour (typically the most congested time of day) under projected future conditions.
- For each intersection location, an "X" indicates whether the identified measure would be required for each alternative.
- For Planned Action EIS Alternatives 2 and 3, Table B-1.3 also summarizes the proportionate share of total PM peak hour trips through each intersection that build-out of the proposed project is expected to contribute.

Table B-1.3. Roadway Capacity Improvements and Action Alternative Proportional Trip Shares[1]

ID	Intersection	Measure (1)	Jurisdiction	Estimated Cost	Alt 1 No Action	Alt 2 Min Village		Alt 3 Max Village	
							Project % Share		Project % Share
	Signalized								
21	SE 272nd St/Covington Way	None Identified (2)	Covington, WSDOT	(2)	X	X	<1%	X	1%
22	SE 272nd St (SR 516)/164th Ave SE	None Identified (2)	Covington, WSDOT	(2)	X	X	1%	X	2%
23	SE 272nd St (SR 516)/Westbound SR 18 Ramps	None Identified (2)	Covington, WSDOT	(2)		X	3%	X	4%
26	SE 272nd St/168th Ave SE	None Identified (2)	Covington, WSDOT	(2)	X	X	<1%	X	1%
29	SE 272nd St/172nd Ave SE	None Identified (2)	Covington, WSDOT	(2)	X	X	-2%	X	-1%
32	SE 272nd St (SR 516)/SE Wax Rd	None Identified (2)	Covington, WSDOT	(2)	X	X	-4%	X	-4%

[1] This table excludes locations 8 and 17 regarding Roundabouts at SE 256th St/164th Ave SE and SE 267th Place/SE Wax Rd/180th Ave SE. In the roundabout analyses presented in the Draft EIS, coding errors were discovered in the analysis files that resulted in overestimation of delay. With correction made to the coding, all three roundabouts are projected to operate well within City level of service standards through 2035, and no future impacts are expected to result under any of the alternatives.

37	SE 272nd St/216th Ave SE	Add eastbound through lane, add eastbound receiving lane. (from Maple Valley Comprehensive Plan) (9)	Maple Valley, WSDOT	(9)	X	X	10%	X	12%
310	SE 231st St/SR 169	Add westbound through lane (from Maple Valley Comprehensive Plan) (9)	Maple Valley, WSDOT	(9)	X	X	1%	X	2%
313	SE 240th St/SR 169	Add eastbound right-turn lane (from Maple Valley Comprehensive Plan)	Maple Valley, WSDOT	(9)	X	X	1%	X	2%
314	SR 516/Witte Rd SE	Add eastbound through lane, convert westbound right-turn lane to right-though, add northbound right-turn lane, add eastbound and westbound receiving lane. (3)	Maple Valley, WSDOT	(3)	X	X	1%	X	2%
315	SR 516/SR 169	Convert westbound right-turn lane to right-though, add westbound receiving lane. (3)	Maple Valley, WSDOT	(3)	X	X	1%	X	1%
	All-Way Stop-Control								
2	SE 240th St/196th Ave SE	Add eastbound left-turn lane.	Covington	$900,000	X	X	6%	X	7%
5	SE Wax Rd/ 180thAve SE	In traffic impact fee program, CIP 1149 (4)	Covington	In traffic impact fee program, #1149		X	11%	X	12%
51	SE 240th St/164th Ave SE	Add eastbound left-turn lane, add westbound left-turn lane, add traffic signal.	Covington, King County (5)	$1,850,000	X	X	4%	X	6%
	One- or Two-Way Stop Control								
1	SE 240th St/180th Ave SE	Add traffic signal.	Covington	$650,000	X	X	9%	X	11%
3	SE 240th St/SE Wax Rd/200th Ave SE	Add traffic signal.	Covington, King County (5)	$300,000	X	X	6%	X	7%
6	SE 256th St/148th Ave SE	Add westbound right-turn lane and eastbound left-turn lane (CIP #1041), add traffic signal.	Covington	In traffic impact fee program, CIP #1041	X	X	4%	X	5%
13	SE 261st St/180th Ave SE	Add traffic signal.	Covington	$450,000	X			X	-12%
		Add eastbound left-turn lane.	Covington	$1,650,000		X	-15%		
18	SE 268th Place/164th Ave SE	Add traffic signal.	Covington	$450,000	X	X	-4%	X	-3%

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No.	Topic and Mitigation Measure								
20	SE 272nd St/156th Pl SE	In traffic impact fee program, CIP 1063 (6)	Covington, WSDOT	In traffic impact fee program, # 1063	X	X	<1%	X	1%
36	SE 272nd St/204th Ave SE	Add southbound left-turn lane, add traffic signal.	Covington, WSDOT	$1,350,000		X	10%	X	13%
39	SE 275th St/SE Wax Rd	In traffic impact fee program, CIP 1085	Covington	In traffic impact fee program, # 1085	X	X	2%	X	3%
50	SE 240th St/156th Ave SE	Add traffic signal.	Covington, King County (5)	$750,000	X	X	6%	X	7%
55	SE 272nd St/156th Ave SE	Add traffic signal. (7)	Kent, Covington(8)	$450,000	X	X	1%	X	1%
58	SE 272nd St/186th Ave SE	In traffic impact fee program, CIP 1128	Covington	In traffic impact fee program, # 1128	X		-17%		-16%
300	SE 256th St/Westbound SR 18 Ramps	**Option A** Add traffic signal. Add eastbound left-turn lane. Coordinate signal timing/phasing with new signal at the northbound SR 18 ramp intersection.	Covington, King County, WSDOT (5)	$1,050,000		X	49%		
		Add traffic signal. Add eastbound and southbound left-turn lanes. Coordinate signal timing/phasing with new signal at the northbound SR 18 ramp intersection.	Covington, King County WSDOT(5)	$1,650,000				X	50%
		Option B Add a roundabout with one lane on the north side and two lanes on the south side. Add a second eastbound approach lane, and a right turn lane on the southbound approach.	Covington, King County WSDOT (5)	$2,250,000		X	49%	X	50%
301	SE 256th St/Eastbound SR 18 Ramps	**Option A** Add traffic signal.	Covington, King County, WSDOT(5)	$450,000	X				

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No.	Topic and Mitigation Measure							
		Add traffic signal. Remove bike lanes across SR 18 overpass, restripe to add eastbound left-turn lane and to channelize bicycles to use sidewalk across the overpass. Add westbound right-turn lane. Coordinate signal timing/phasing with new signal at the westbound SR 18 ramp intersection.	Covington, King County, WSDOT(5)	$670,000		X	69%	
		Add traffic signal. Remove bike lanes across SR 18 overpass, restripe to add eastbound left-turn lane and to channelize bicycles to use sidewalk across the overpass. Add westbound and northbound right-turn lane. Coordinate signal timing/phasing with new signal at the westbound SR 18 ramp intersection.	Covington, King County, WSDOT(5)	$2,370,000				X 72%
		Option B Add a one-lane roundabout. Add right-turn lanes on the northbound and westbound approaches.	Covington, King County, WSDOT (5)	$3,350,000		X	69%	X 72%

Source: Heffron Transportation, David Evans & Associates, November 2013.

1. The roadway improvement measures that have been identified would improve operation to meet local level of service standards under projected 2035 conditions with build-out of local and regional land use plans, with the three alternatives. Projects located at Covington concurrency intersections are being added to the City's 2035 Capital Improvement Program as part of the Comprehensive Plan update. However, if regional development growth occurs to the extent projected, it is possible that other measures could be identified to address the impact at the time the need for improvement is triggered.
2. No mitigation measures have been identified at these intersections. For projected 2035 conditions, SE 272nd Street is assumed to be a five-lane section throughout Covington, with additional turn-lanes at high volume intersections. If growth occurs to the degree reflected in the model projections, it is likely that the City of Covington would reevaluate its long-term plan for the corridor, and determine if widening is warranted, or if it would be warranted to reexamine level of service standards and allow this section to operate lower than LOS D. The two Action alternatives do not significantly affect this outcome.
3. Analysis indicates that with projected 2035 volumes and any of the three alternatives, SR 516 would need to be widened to 5 lanes between 216th Avenue SE and SR 169 in order to meet City of Maple Valley concurrency standards. If growth occurs to the degree reflected in the model projections, it is likely that the City of Maple Valley would reevaluate its long-term plan for the corridor and determine if widening is warranted or if it would be warranted to reexamine level of service standards and allow this section to operate lower than LOS D. This issue is identified for the 2035 No Action alternative, and the two Action alternatives do not significantly affect this outcome.
4. See traffic impact fee program, project CIP 1149 for the improvement.
5. While this intersection is located outside of the Covington city limits in King County, the City of Covington monitors operations at this location.
6. Improvement at this location is assumed in the City's current traffic impact fee program, in project CIP 1063. See also Note 1.
7. Alternatively, turn movements could be restricted to right-turns only at this intersection. In this case, it is assumed that the projected westbound left-turn movement (180 vehicles in each alternative) would instead turn at 152nd Avenue SE. Phasing

No.	Topic and Mitigation Measure
	changes could be made to allow SE 256th Street/152nd Avenue SE to operate at LOS E in this circumstance, but additional capacity improvements would be needed to improve operation to LOS D. 8. This intersection is located outside of the Covington city limits in the City of Kent. However, Covington monitors operations at this location. 9. This project is included in the City of Maple Valley's long-range Transportation Improvement Program provided in the City Comprehensive Plan (City of Maple Valley 2011). The City of Maple Valley's planned improvements would address level of service issues with all three alternatives and no additional improvements would be needed. B. Consideration of Alternative Mitigation Measures. Upon request by a Planned Action Project applicant, or by an agency, the City may consider mitigation measures other than those described in Table B-1.3 to address an impact at the time the need for improvement is triggered, provided City concurrency and level of service standards are met as well as the provisions of this Ordinance. Planned Action Projects at locations 5, 36, 300 and 301 shall be implemented based on Mitigation Measure 36 herein. C. Impact and Mitigation Fees / In-City Improvements. Planned Action Project applicants shall pay a proportionate share of the costs of the projects needed to support concurrency~~. For projects within the City limits, the fee per peak hour trip rate shall be $167.38 consistent with Exhibit D of this Ordinance and shall be paid in addition to the City's standard impact fee in place as of 2013. The projects listed in the preceding Table B-1.3 are incorporated by reference in the City's Capital Facilities Plan Element as part of the Comprehensive Plan update. Once the City's impact fee is amended to address improvements identified in the Planned Action and not previously included in the 2013 impact fee, Planned Action Project applicants shall provide an impact fee consistent with the City's ordinances in effect at the time of application.~~ consistent with applicable impact fees and improvement costs identified in the Development Agreement.
36.	ROADWAY CAPACITY PROJECTS REQUIRED CONCURRENT WITH DEVELOPMENT A. The following additional roadway capacity improvements shall be implemented by Planned Action Projects. Where options for improvements are provided, Planned Action applicants shall obtain approval for the selected alternative from the responsible agency specified below. • 5 – SE Wax Road/SE 180th Street: Increased traffic volumes resulting from Alternative 2 or 3 require additional capacity improvement at this location. Analysis indicates that addition of a northbound right-turn lane would allow the intersection to operate at LOS D or better through 2035. However, space at this location is constrained by a retaining wall located along the east side of the roadway. If it is not feasible to widen the roadway at this location, installation of a traffic signal would also address the impact. This improvement is addressed in the City's transportation impact fees as of 2013. This City-required improvement is required to be installed concurrent with development consistent with Mitigation Measure 36 herein. • 36 – SE 272nd Street/~~204th Avenue SE~~Covington Connector: Increased traffic volumes resulting from the ~~204th Avenue SE~~Covington Connector Roadway require that this intersection be signalized under Alternative 2 or 3. The planned three-lane section will also need to be extended to this intersection, providing a southbound left-turn lane. This City-required improvement is accounted in the mitigation fee in Mitigation Measure 35C herein and is required to be installed concurrent with development consistent with Mitigation Measure 36 herein. • 300 – SE 256th Street/SR 18 Westbound Ramps: o Option A (Signal): Both Alternative 2 and Alternative 3 trigger the need to signalize this intersection and add an eastbound left-turn lane. Alternative 3 also requires the addition of a southbound left-turn lane on the ramp. o Option B (Roundabout): Alternatively, for Alternative 2 or 3, level of service impacts can be mitigated by construction of a roundabout that has one lane on the north side and two lanes on

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No.	Topic and Mitigation Measure

the south side. A second eastbound approach lane and a right-turn lane on the southbound approach also need to be added.

B. Planned Action Projects shall implement Project 300 in consultation with Washington State Department of Transportation and King County as appropriate. The planning level cost estimates for the improvements in Mitigation Measure 35 herein depend on the improvement required by agencies with jurisdiction.

- 301 – SE 256th Street/SR 18 Eastbound Ramps:
  - Option A (Signal): Addition of a traffic signal at this location is triggered with the No Action alternative, but additional capacity improvements are needed to accommodate traffic volumes generated by Alternatives 2 and 3. In order for the intersection to operate at LOS D or better with both alternatives, it is necessary to add an eastbound left-turn lane on the existing SR 18 overpass. The width of the west leg of this intersection is constrained by the bridge structure; however, it appears there may be adequate curb-to-curb width to accommodate three travel lanes. The addition of a center left-turn lane would require that the existing bicycle lane striping be removed, and bicyclists to be directed to use the sidewalk to cross SR 18. As project-generated trips decrease on the ~~204th Avenue SE~~Covington Connector, model projections in the Planned Action EIS indicate that non-project-generated trips would increase. As a result, there is very little difference in the projected eastbound traffic volumes between the two Action alternatives at this location. In addition to the eastbound left-turn lane, a westbound right-turn lane is needed with both Alternative 2 and Alternative 3. Alternative 3 would also need to add a northbound right-turn lane on the ramp. Construction of this improvement would likely require retaining walls to be built on the east side of the intersection.
  - Option B (Roundabout): Alternatively for Alternative 2 or 3, level of service impacts could be mitigated by construction of a one-lane roundabout, with right-turn lanes added on the northbound and westbound approaches. Similar to the signal option, construction of this option would require retaining walls to be constructed on the east side of the intersection, but no additional vehicle lanes would be needed across the bridge structure.
  - Note: with Alternative 2 or 3, for the SE 256th Street/SR 18 ramp intersections, the same improvement option (Option A – signal, or Option B – roundabout) would need to be chosen for both intersections.

C. Planned Action Projects shall implement Project 301 in consultation with Washington State Department of Transportation and King County as appropriate. The planning level cost estimates for the improvements in Mitigation Measure 35 herein depend on the improvement required by agencies with jurisdiction.

D. Phasing or Timing. The City shall condition Planned Action Projects to provide required roadway capacity projects concurrent with development. Improvement at the four locations in Paragraph A is triggered by the ~~Hawk Property~~Lakepointe Urban Village Subarea Planned Action as analyzed in the Planned Action EIS. The expected timing is as follows:

- At SE Wax Road/SE 180th Street (5), it is estimated that the need for improvement would be triggered when trips generated by the development reach about 92% of the total estimated for the Maximum Village, approximately 2,370 net new primary trips.

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No.	Topic and Mitigation Measure
	• The other three locations (36, 300, and 301) requiring improvement would become the endpoints of the proposed new ~~204th Avenue SE~~Covington Connector, once it is constructed. Therefore, improved traffic control shall be installed at the time that the new roadway is constructed. • If it were desired to phase in the intersection improvements at a later date, the Planned Action Project developer shall submit to the City and agencies with jurisdiction a detailed traffic analysis showing that City concurrency standards would still be met. E. Latecomers Agreements. Planned Action Project applicants may request City approval of a Latecomer's Agreement subject to CMC Chapter 13.45, Latecomer's Agreements.
37.	MITIGATION TO ADDRESS SHORT-TERM CONSTRUCTION IMPACTS To minimize the potential short-term traffic impacts resulting from construction of the alternatives, a Traffic Control Plan shall be prepared by Planned Action Project applicants to the satisfaction of the City's SEPA Responsible Official in accordance with City guidelines. • All building and construction permits shall be reviewed and conditioned to mitigate construction traffic impacts. • The types of transportation-related measures that could be considered would depend on the type and size of the phase under construction. The Traffic Control Plan shall consider the inclusion of the following measures where applicable: o Truck haul-routes to and from the site. o Peak hour restrictions for construction truck traffic and how those restrictions would be communicated and enforced. o Truck staging areas (e.g., locations where empty or full trucks would wait or stage prior to and during loading or unloading.) o Measures to reduce construction worker trips such as rideshare or shuttles. o Provision of on-site or nearby parking for construction workers. o Road, lane, sidewalk, or bike lane closures that may be needed during utility, street or building construction. A plan detailing temporary traffic control, channelization, flagging, and signage measures, and possible detour routes, should be provided for affected facilities. o Plan to maintain access to residences and businesses at all times. o Restoration or repair of the pavement in the road right-of-way in accordance with City standards upon completion of the work. o Other elements or details may be required in the Traffic Control Plan as required by the City of Covington. The project developer/owner and the contractor shall be required to incorporate other City requirements into an overall plan, if applicable.

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No.	Topic and Mitigation Measure
	Public Services
38.	FIRE MITIGATION The City shall require a mitigation agreement between the Planned Action Project developer and Kent Regional Fire Authority prior to development to address the impacts identified in the Planned Action EIS. • The mitigation agreement should address impacts to daily and peak hour workload at KFD Station 78 resulting from Planned Action Project development. • ~~If the mitigation agreement is superseded by an impact fee,~~ Planned Action Projects shall comply with the impact fee requirements and other applicable regulations in place at the time of the application~~.~~; see Chapter 19.50 CMC.

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No.	Topic and Mitigation Measure
39.	PARKS AND TRAILS At the time of Planned Action Project application, the City shall review submitted conceptual and detailed site plans to ensure that sufficient park space and trails are provided to be consistent with both the LOS standards of the Parks and Recreation Element of the Comprehensive Plan and with the requirements of CMC 18.35.150. • Planned Action Project applications shall demonstrate a consistent and compatible network of parks and trails throughout the site similar to Planned Action EIS Alternatives. Pursuant to the requirement to prepare a conceptual site plan with phasing in Subsection III.G(3) of this Ordinance, the Planned Action Project applicant shall identify on-site parks and trails, including trail connections to adjacent sites, to promote the goals and policies of the Hawk Property Subarea Plan regarding walkability, connectivity, and reducing trips. • Public ~~open space~~Parks area shall be provided consistent with City level of service standards adopted in the Comprehensive Plan~~.~~ for Neighborhood Parks (3 acres per 1, 000 residents). The size associated with the Lakepointe 2018 Proposal is a minimum of 9.66 acres; future Planned Action Projects may result in a similar or greater population and demand for facilities. Planned Action applicants shall also provide at least two ½ acre public gathering areas in the RCMU zone – one south of the Covington Connector and one north of the Covington Connector (see CMC 18.35.310 (5)(d) and CMC 18.35.310(6)(a)). • Private open space shall be required and installed consistent with the requirements of CMC 18.35.150 to 190. • Planned Action Project applicants shall provide parks and trail facilities prior to or concurrent with the development. The City may require such facilities to be dedicated to the City. • ~~At the request of Planned Action Project Applicants, the City may accept fees in lieu of parks and trails facilities where the City anticipates that coordinated implementation of public parks and trails is desired. The fee-in-lieu agreements shall address the responsibility and cost for operation and maintenance of said parks and trails facilities. The fee-in-lieu agreement shall be in a form acceptable to the City and may be developed as a voluntary agreement under RCW 82.02.020.~~ • Residential development in the Lakepointe Urban Village Subarea is subject to assessment of park impact fees as required by CMC Chapter 19.60. Procedures for payment, credits, and other features are included in that Chapter.
39A.	POLICE • To address policing needs during construction, development phasing and occupancy, as part of the proposal, the Master Developer, its assignees or transferees, will pay for 75% of the recruiting, hiring, and training cost ("Training Costs") of four new entry-level police officers. Payment equivalent to one officer's Training Costs will be made to the City at building permit issuance for commercial development at each of the following four levels of development: 675,000 sf, 925,000 sf, 1,075,000 sf, and 1,320,000 sf. These payments will not be triggered unless all items necessary to increase the development caps for the Lakepointe project are approved, including, the pending 2018 Comprehensive Plan amendments, the Planned Action Ordinance update, and the Development Agreement amendment. • The Training Costs shall be calculated using the Adopted Cost Book in the Interlocal Agreement between the city of Covington and King County Sheriff's Office, for the year payment is made. Training Costs shall be calculated for one entry level Officer, for nine (9) months of the following annual costs to the City: base salary, benefits, proportionate share of King County Sheriff fully loaded costs (e.g. overtime,

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No.	Topic and Mitigation Measure
	equipment, vehicles, licenses, radio, training etc.) and a proportionate share of overhead costs. For clarity, the *Adopted Cost Book* for 2019 is included in Exhibit E.
39B.	• Site Design and Building Design CPTED assessment by a professional with current CPTED Professional Designation is required for all non-single-family residential development within the Lakepointe Subarea. • The Master Developer shall engage a CPTED practitioner with a current CPTED Professional Designation to incorporate CPTED provisions into the Master Developer Design Guidelines to ensure site and building design that limit use patterns that lead to conflict and negative behaviors and reducing the opportunities for crime.
39C.	• The Master Developer shall work with the Covington Police Department on the final location, design, size, and features of its substation within the RCMU zone in order to coordinate adequate policing of the site consistent with the Development Agreement.
	Cultural Resources
40.	The City shall condition Planned Action Projects to protect any currently undiscovered historic or archaeological resources in the study area as follows: • If construction activities uncover any remains of historic or archaeological significance, construction shall immediately be stopped and all appropriate state and local agencies notified. • Projects that entail substantial excavation must enter consultation with DAHP to determine the likelihood of inadvertent discovery of archaeological resources and to establish mitigation procedures. Archaeological surveys and testing may be necessary prior to excavation. The Department of Archaeology and Historic Preservation (DAHP) may recommend archaeological monitoring of construction activities in areas deemed to have a high likelihood of discovery. • In the event of an archaeological discovery, future development on property surrounding the archaeological site shall analyze the potential for adverse impacts to the archaeological resource, and, if necessary, engage a qualified professional archaeologist to determine whether the proposed development would negatively affect the archaeological resource.

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ATTACHMENT B-2

Advisory Notes to Applicants: Applicable Regulations and Commitments

The Planned Action EIS identifies specific regulations that act as mitigation measures. These are summarized in **Table B-2.1** by EIS topic. All applicable federal, state, and local regulations shall apply to Planned Action Projects. Planned Action Project applicants shall comply with all adopted regulations in place at time of development application where applicable including those listed in the Planned Action EIS and those not included in the Planned Action EIS.

Table B-2.1. Applicable Regulations and Commitments, as amended

Topic	Regulation/Commitment
Earth	• The federal government provides seismic information and standards. The 2012 IBC has adopted the seismic recommendations developed by the National Earthquake Hazards Reduction Program (NEHRP) (Federal Emergency Management Agency 2009) using the 2008 probabilistic seismic hazard maps developed by the U.S. Geological Survey for a seismic event with a recurrence interval of 5,000 years. The American Association of State Highway and Transportation Officials (AASHTO) standards rely on the 2002 U.S. Geological Survey probabilistic hazard mapping; however, AASHTO (2012) uses a seismic event with a recurrence interval of 1,000 years as the basis for design. • The State of Washington adopted the ~~2012~~2015 edition of the International Building Code (ICC 2012) on July 1, 2013. The IBC applies to the design of continuously occupied buildings, so would apply to residences and most commercial buildings. The types of buildings that would be developed at the Planned Action Area will most likely be designed in accordance with the 2012 IBC or the version of the manual in effect at the time of the development application. • State highway projects in Washington are typically designed in accordance with the Washington State Department of Transportation Design Manual (2010) or current version at the time of the permit application, which generally adopts AASHTO standards, with certain additional requirements or guidance. • Washington State Department of Ecology implements the National Pollutant Discharge Elimination System (NPDES) Construction Stormwater Permit system, which requires construction contractors to implement erosion and sedimentation control systems at all major construction sites. • The City uses the IBC as adopted by the State of Washington and amended by the City of Covington in the Covington Municipal Code. The only critical areas mapped inside the study area (City of Covington 2003) are wetlands along Jenkins Creek, which are discussed in Planned Action EIS Section 3.4. The City also adopted critical areas regulations in the Covington Municipal Code (Chapter 18.65). These regulations do not preclude development within critical areas, but do require permitting and special design and review to show that the proposed development minimizes impacts to critical areas to a satisfactory degree and manages hazards appropriately.
Surface Water Resources	Regulations adopted at the time development permits are submitted will be applicable, such as: • Department of Ecology, Stormwater Manual for Western Washington • City of Covington Surface Water Management Program, CMC 13.25 • City of Covington Clearing and Grading Regulations, CMC 14.60.120, which require spill prevention and control measures for the maintenance, fueling, and repair of heavy equipment on a construction site • City of Covington Design and Construction Standards • Low Impact Technical Guidance Manual for Puget Sound • Washington State Statutes • US Environmental Protection Agency, Clean Water Act

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Topic	Regulation/Commitment
Groundwater Resources	The Planned Action Area is near, but not within, the Armstrong Springs Aquifer Protection Area, which is documented as Zone 1 in the City of Kent Wellhead Protection Program (Aspect 2008). Critical Aquifer Recharge Areas (CARAs) regulations are intended to protect groundwater; those regulations focus on underground storage tanks, abandoned wells, and stormwater infiltration. Based on geologic mapping the site is primarily characterized as a groundwater discharge site. However, given site proximity to CARAs and the onsite well, the following regulations, in current or amended form, could apply to site development activities. • ~~2012~~2014 Stormwater Management Manual for Western Washington, as amended • City of Covington Standard Plan Notes and Covington Municipal Code, Chapter 13.37 • Low impact development measures are based on the current version of Washington State Department of Ecology's stormwater manual; the manual in effect at the time of development applications would apply • 2012 Stormwater Management Manual for Western Washington Chapter 2.5.2 Element 13: Minimum Requirements for New Development and Redevelopment – Protect Low Impact Development BMPs.
Air Quality	• National Ambient Air Quality Standards (NAAQS): The US EPA establishes NAAQS and specifies future dates for states to develop and implement plans to achieve these standards. • State Ambient Air Quality Standards: The Washington State Department of Ecology establishes state ambient air quality standards for the same six pollutants that are at least as stringent as the national standards; in the case of SO2, state standards are more stringent. • Outdoor Burning: Burning yard waste and land-clearing debris is not allowed at any time in areas of King County. PSCAA enforces state outdoor burning regulations required by RCW 70.94.743. • Puget Sound Clean Air Agency Regulations: All construction sites in the Puget Sound region are required to implement rigorous emission controls to minimize fugitive dust and odors during construction, as required by PSCAA Regulation 1, Section 9.15, Fugitive Dust Control Measures. All industrial and commercial air pollutant sources in the Puget Sound region are required to register with PSCAA. Facilities with substantial emissions are required to obtain a Notice of Construction air quality permit before construction is allowed to begin. • State of Washington GHG Laws: The Washington Legislature enacted RCW 70.235, Limiting Greenhouse Gas Emissions, into state law. The law sets the following standards: ○ Reduce emissions to 1990 levels by 2020, 25% below 1990 levels by 2035, and 50% below 1990 levels by 2050. ○ Reduce expenditures on fuel imported into Washington State by 20% by 2020. ○ Decrease the annual per capita vehicle miles traveled 18% by 2020, 30% by 2035, and 50% by 2050. The state law applies only to actions taken by Washington State agencies and local governments. State regulations on GHG emissions include prerequisites for distribution of capital funds for infrastructure and economic development projects, where projects receiving funding must be evaluated for consistency with state and federal GHG limits and state VMT goals (RCW 20.235.070).

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Topic	Regulation/Commitment
Plants and Animals	Current local, state, and federal regulations protecting plants and animals include: • CMC 18.65, Critical Areas; • ~~King County Zoning Code (KCC) 21A.24, Critical Areas (only applicable until annexation is complete);~~ • US Army Corps of Engineers (Corps) regulate wetlands under section 404 of the Clean Water Act; • Washington State Department of Ecology may require an individual 401 Water Quality Certification and Coastal Zone Management Consistency determination for Corps permits; • U.S. Fish and Wildlife Service and/or the National Marine Fisheries Service, for federally permitted actions that could affect endangered species (i.e. salmon or bull trout); and • No State or federally listed threatened or endangered plant or animal species have been observed on or adjacent to the site. The site does contain habitat that could be used by such species. See mitigation measures for an evaluation and consultation regarding compliance with state and federal laws, including the State Hydraulic Code, Sections 401 and 404 of the Clean Water Act, and Section 7 of the Endangered Species Act. • Critical area impacts will be avoided and minimized to the extent possible. Any impacts would be fully mitigated as required by the Covington's critical areas regulations. Temporary critical area impacts, such as disturbance and possible erosion/sedimentation would be addressed by restoring the affected areas to the same or an improved condition, as required by Covington's critical area regulations and other applicable state and federal regulations. • Erosion control measures would be implemented prior to construction as detailed in the Earth and Water Resource sections.

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<table>
<tr><th>Topic</th><th>Regulation/Commitment</th></tr>
<tr><td>Noise</td><td>
LOCAL: CITY OF COVINGTON NOISE REGULATIONS

CMC 8.20 establishes regulations to minimize the exposure of citizens to excessive noise. The CMC clearly states the hours during which certain noisy activities are prohibited but does not specify numerical limits for permissible noise levels. The City's code references state noise regulations.

The CMC prohibits sounds originating from construction activity between the hours of 8:00 p.m. and 7:00 a.m. on weekdays and 6:00 p.m. and 9:00 a.m. on Saturdays, Sundays, or Federal holidays. However, prohibitions on construction activities may be waived or modified for work involving public utilities within the public right-of-way if approved by the City Manager or his/her designee.

FEDERAL: FEDERAL HIGHWAY ADMINISTRATION (FHWA) TRAFFIC NOISE REGULATIONS

Federal FHWA funding, distributed WSDOT, may be used for street improvements associated with this project, and as such, the noise criteria established in Title 23, Part 772 of the Code of Federal Regulations (CFR) may apply. The FHWA Noise Abatement Criteria (NAC) are summarized in Table B-2.2.

Table B-2.2. Federal Highway Administration Noise Abatement Criteria
<table>
<tr><th>Activity Category</th><th>Criterion (dBA Leq)</th><th>Description of Activity Category</th></tr>
<tr><td>A</td><td>57 (exterior)</td><td>Lands where serenity and quiet are of extraordinary significance and that serve an important public need and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose.</td></tr>
<tr><td>B</td><td>67 (exterior)</td><td>Picnic areas, recreation areas, playgrounds, active sports areas, parks, residences, motels, hotels, schools, churches, libraries, and hospitals.</td></tr>
<tr><td>C</td><td>72 (exterior)</td><td>Developed lands, properties, or activities not included in Categories A or B above.</td></tr>
<tr><td>D</td><td>--</td><td>Undeveloped lands.</td></tr>
<tr><td>E</td><td>152 (interior)</td><td>Residences, motels, hotels, public meeting rooms, schools, churches, libraries, hospitals, and auditoriums.</td></tr>
</table>
Source: FHWA, CFR, 2013

STATE: NOISE CONTROL ACT OF 1974 (WAC 173-60)

WAC 173-60-040 establishes maximum permissible noise levels for various environments, and construction activities under all alternatives would be subject to these provisions.

STATE: WASHINGTON DEPARTMENT OF TRANSPORTATION TRAFFIC NOISE REGULATIONS

WSDOT has adopted the FHWA NAC for evaluating noise impacts and for determining if such impacts are sufficient to justify funding of noise abatement for new roadway construction and roadway widening projects with state funding. The WSDOT traffic noise policy described below meets the federal requirements of 23 CFR 772 described above, so compliance with the WSDOT traffic noise policy will meet FHWA noise requirements. For WSDOT-funded roadway projects, a noise impact occurs when a predicted traffic noise level under the design year conditions approaches within 1 dBA of the FHWA NAC (for example, WSDOT defines a traffic noise impact at a dwelling to be 66 dBA or higher). In addition, WSDOT defines a traffic noise impact to occur when the predicted traffic noise level substantially exceeds the existing noise level. A 10-dBA increase over existing noise levels is considered a substantial increase.
</td></tr>
<tr><td>Land Use Patterns/Plans and Policies</td><td>
~~• Prior to annexation to the City of Covington, the unincorporated portion of the subarea would be subject to the provisions of King County Code Title 21, including the following Chapters:~~
~~○ 21A.08: Permitted Uses~~
~~○ 21A.12: Development Standards – Density and Dimensions~~
~~○ 21A.14: Development Standards – Design Requirements~~
~~○ 21A.16: Development Standards – Landscaping and Water Use~~
~~○ 21A.18: Development Standards – Parking and Circulation~~
</td></tr>
</table>

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Topic	Regulation/Commitment
	~~○ 21A.20: Development Standards – Signs~~ ~~○ 21A.22: Development Standards – Mineral Extraction~~ ~~○ 21A.24: Critical Areas~~ • ~~After annexation into the City of Covington, all~~All development in the Planned Action Area ~~will be~~is subject to the provisions of CMC Title 18 – Zoning as vested and included in the Development Agreement. Planned actions are also subject to portions of Title 18 and Title 19 that are not vested, and the current version shall apply at the time of application, including the following Chapters: ~~○ 18.25: Permitted Uses~~ ~~○ 18.30: Development Standards – Density and Dimensions~~ ~~○ 18.35: Development Standards – Design Requirements~~ ~~○ 18.40: Development Standards – Landscaping~~ ~~○ 18.50: Development Standards – Parking and Circulation~~ ○ 18.55: Development Standards – Signs ○ 18.65: Critical Areas ○ 18.90 Residential Density Incentives ○ 18.95 Transfer of Residential Density Credits ○ Title 19
Transportation	CITY OF COVINGTON DESIGN STANDARDS ~~For Alternatives 2 and 3, internal~~Internal roadways, and non-motorized facilities are subject to design standards presented in Covington Design Guidelines (City of Covington 2005) and CMC Chapter 18.50 - Development Standards – Parking and Circulation. The proposed new roadway connections would be subject to the City's Design and Construction Standards for roadways. (City of Covington 2009) ~~CITY OF COVINGTON PARKING CODE~~ ~~For Alternatives 2 and 3, the amount of parking supply provided as the subarea develops would be subject to parking requirements defined in CMC Chapter 18.50 - Development Standards – Parking and Circulation.~~
Public Services	FIRE Implement the City's adopted fire code at CMC 15.20 Fire Code. SCHOOLS • ~~Until annexation by the City of Covington, development~~Development in the ~~unincorporated portions of the~~ Planned Action Area ~~will be subject to assessment of school impact fees as required by King County Code Chapter 27.44.~~ • ~~After annexation by the City of Covington, development in the Planned Action Area will be~~is subject to assessment of school impact fees as required by Covington Municipal Code Chapter ~~18.120~~19.140.
Utilities	Plans and regulations adopted at the time Planned Action Project development permits are submitted will be applicable, such as: • Department of Ecology, Stormwater Manual for Western Washington • City of Covington Surface Water Management Program, CMC 13.25 • CMC Title 13 Public Utilities • Soos Creek Water and Sewer District Comprehensive Plan • Covington Water District Water System Plan

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EXHIBIT C

Public Agency Actions and Commitments

INTRODUCTION

Under some elements of the Planned Action EIS, specific City or other agency actions are identified. Generally, incorporation of these actions is intended to provide for consistency within the City's Comprehensive Plan, ~~Hawk Property Subarea Plan, or between the Hawk Property Subarea Plan and~~or implementing regulations; to document pending City actions; to establish a protocol for long-term measures to provide for coordination with other agencies; or to identify optional actions that the City may take to reduce impacts. These actions are listed below in Table C.1.

Actions identified as "Proposed Concurrent Actions" refer to legislative actions proposed for adoption together with the Preferred Alternative CIP. Actions identified as short term are currently underway or expected to be completed in time for the next major Comprehensive Plan review. Longer term and other agency actions will occur in the future, depending on need. The projected timeframe and responsible departments are identified and will be used in monitoring the implementation of this Ordinance.

This Exhibit C will be used in the monitoring process established in Section IV of this Ordinance.

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Table C.1
Public Agency Mitigation Measures

Mitigation Measures	Proposed Synchronous Amendments	Short Term: Next Comp Plan Amendment Cycle or within 5 years	Long Term	Other Agency	Estimated Year of Implementation and Responsible Department
The City could provide neighboring property owners with educational resources to encourage native plant use and backyard habitat projects.			X		Community Development Department Year: To be determined by City based on available resources. This could be a partnership opportunity such as with a conservation district.
~~As part of integrating the Hawk Property Subarea Plan into the Comprehensive Plan, the City should amend land use designations, goals, policies, and capital facility improvements supporting the anticipated growth of the urban village. In addition, the City should make associated housekeeping amendments to update the status of the reclaimed mine site as transforming to an urban village.~~	~~X~~				~~Community Development / Public Works / Parks Departments~~ ~~2014~~
The City would continue its 5-lane widening of SE 272nd Street to include the segment between 192nd Avenue SE and the east city limits. The estimated cost for widening SE 272nd Street to 5 lanes between 192nd Avenue SE and the east city limits is $40.2 to $55.9 million. This segment of the project should be included in the City's Capital Improvement Program.	X				Community Development / Public Works Departments 2014
Transportation projects studied in the Planned Action EIS will need to be added to the City's Capital Improvement Program as part of its next Comprehensive Plan update. Additionally, the City's Traffic Impact Fee Program will need to be updated to include these additional projects.	X Add to CFP	X Traffic Impact Fee Program			CFP: Community Development Department 2014 Traffic Impact Fee: Public Works 2015

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Mitigation Measures	Proposed Synchronous Amendments	Short Term: Next Comp Plan Amendment Cycle or within 5 years	Long Term	Other Agency	Estimated Year of Implementation and Responsible Department
If growth occurs to the degree reflected in the model projections, it is likely that the City will reevaluate its long-term plan for the for the SE 272nd corridor, and determine if widening is warranted, or if it is warranted to reexamine level of service standards and allow this section to operate lower than LOS D. Under these circumstances, the City would be required to decide upon one of these options—additional capacity improvements or a level of service policy change—in order to support concurrency.			X		Public Works Ongoing
If regional land use growth occurs at the rate reflected in the Covington model assumptions through 2035, it is likely that the City of Maple Valley will reevaluate its long-term plan for the for the SE 272nd corridor, and determine if widening is warranted, or if it is warranted to reexamine level of service standards and allow this section to operate lower than LOS D. Under these circumstances, the City of Maple Valley would be required to decide upon one of these options—capacity improvements or a level of service policy change—in order to support concurrency.			X	X	City of Maple Valley Ongoing
The City should adopt comprehensive plan policies stating that the City will plan cooperatively with WSDOT and neighboring cities to define the ultimate capacity for the SE 272nd Street roadway.		X			Community Development Department/Public Works 2015
The City could adopt a formal commercial LOS standard for police service in addition to a residential LOS standard and coordinate with the King County Sheriff's Office on monitoring of call responses to incidents by members of the Covington Police Department.		X			Community Development Department/Police Department 2015

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Mitigation Measures	Proposed Synchronous Amendments	Short Term: Next Comp Plan Amendment Cycle or within 5 years	Long Term	Other Agency	Estimated Year of Implementation and Responsible Department
The City should contract with the King County Sheriff's Office for the services of additional police officers commensurate with the level of development ultimately approved for the subarea. To meet site policing demand no less than 1 police officer should be hired by City during the construction phase of the site to deal with theft issues, commercial vehicle enforcement, and coordination with the Master Developer on CPTED and crime prevention. Sales tax revenue from the Lakepointe Urban Village could eventually pay for the cost of the extra police services needed for the site. This will not happen during construction or immediately upon opening.				X	Police Department Determine through development phasing Ongoing

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Exhibit D. ~~Transportation Cost Estimates~~

~~Planning Level Cost Estimates – City Transportation Projects in Addition to Base Impact Fee~~

Component	Estimated Component Cost	2	51	1	3	13	13	18	36	50	55	Sum	Net New Primary PH	Cost Per Trip
		Total Project Estimates	$900,000	$1,850,000	$650,000	$300,000	$450,000	$1,650,000	$450,000	$1,350,000	$750,000	$450,000			
		% Share: Alternative 2	6%	4%	9%	6%		-15%	-4%	10%	6%	1%			Not Applicable
		Cost Share: Alternative 2	$54,000	$74,000	$58,500	$18,000	$0	($247,500)	($18,000)	$135,000	$45,000	$4,500	$123,500	1965	$62.85
		% Share: Alternative 3	7%	6%	11%	7%	-12%		-3%	13%	7%	1%			Not Applicable
		Cost Share: Alternative 3	$63,000	$111,000	$71,500	$21,000	($54,000)	$0	($13,500)	$175,500	$52,500	$4,500	$431,500	2578	$167.38
Right Turn Lane	$ 200,000														
Left Turn Lane	$ 600,000	1	2				1		1						
Add Through Lane	$ 400,000														
Add Receiving Lane	$ 750,000														
Striping	$ 20,000														
New Traffic Signal	$ 450,000		1	1		1	1	1	1	1	1				
Modify Traffic Signal	$ 250,000														
Single Lane Roundabout	$ 1,500,000														
Multi-lane Roundabout	$ 2,250,000														
Bridge/Culvert Replacement	$ 1,500,000														
Significant Walls	$ 400,000						1								
Minor ROW	$ 200,000	1	1	1	1		1		1	1					
Major ROW	$ 500,000														
Minor Env	$ 100,000									1					
Major Env	$ 300,000														
Major Utility Relocation	$ 100,000	1			1				1						

Assumptions:
This document estimates the cost of each mitigation proposal in Mitigation Measure 35, except for projects that are outside of Covington, and projects already in the traffic impact fee program.
Estimates are conceptual level and are based upon the descriptions in the exhibit and "Google maps" site review.
Estimates are based upon recent experience with similar projects by David Evans and Associates consultants.
The percent share for each project is shown.
The cost per trip is in addition to the city's base impact fee.
SR 516 is identified for improvement in the EIS under No Action conditions. However, Alternative 3 results in a decrease of trips west of 204th which would offset the expected increase in trips east of 204th. Therefore consultants have assumed a zero proportional share (and the project is not included in this matrix).

~~Exhibit E.~~ Planned Action EIS Conceptual Alternatives

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Alternative 2 Conceptual Land Use Plan



Note: The size, shape, and location of all land uses, trails, and road alignments depicted are conceptual. Final locations and extents will be determined as part of final site plan approval.

Source: Communita, 2013

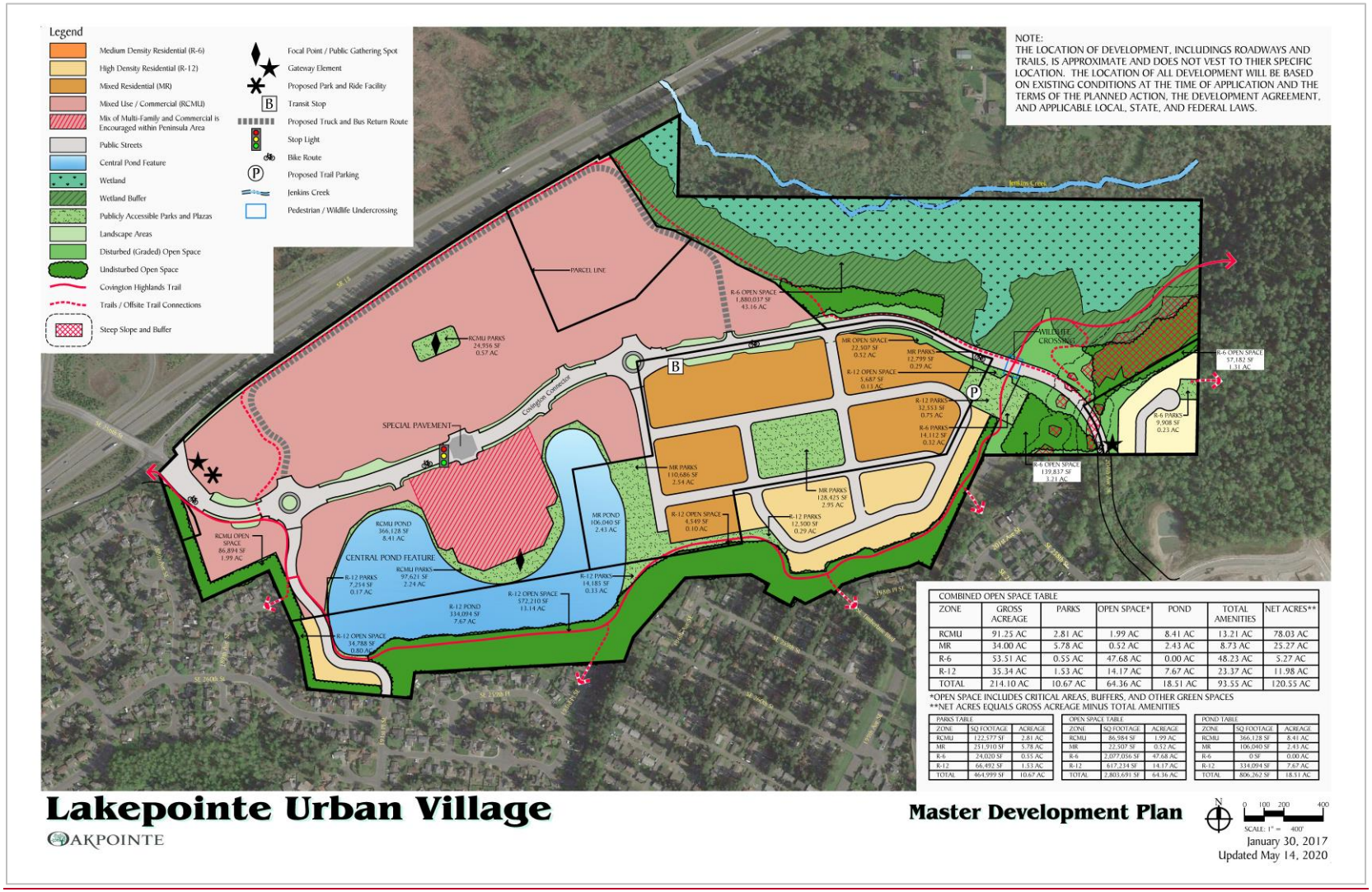
Alternative 3 Conceptual Land Use Plan



Note: The size, shape, and location of all land uses, trails, and road alignments depicted are conceptual. Final locations and extents will be determined as part of final site plan approval.

Source: Communita, 2013

Lakepointe Development Agreement Master Development Plan



FINAL 2020A Exhibit A: COSTS and STAFFING

Date: 5/19/2020

SERVICE OPTIONS	Required/ Optional	Flex/ Dedicated	Base Salary & Special Pays	Benefits (FICA, Retirement, Medical, Industrial Insurance)	Overtime	Uniform, Equipment, Supplies, Services, Telephone	Vehicles	Insurance, 800 MHz, MARR, System Messaging	Payroll, Crime Analysis, Records, Evidence, IT, etc.	Training, Firing Range & Data	Patrol Ops Admin	Cell Phone	Precinct Support Staff *	Fully-Loaded Cost
Police Chief	R	D												
Major	--	D	182,942	41,251	0	1,631	10,122	7,404	16,280	10,128	1,598	998	3,425	275,778
Captain	--	D	162,742	39,851	0	1,631	10,122	7,404	16,280	10,128	1,598	998	3,425	254,179
Sergeant	--	D	141,476	39,638	7,964	1,631	15,640	7,404	16,280	10,128	1,598	998	3,425	246,181
Captains	R	F/D	162,742	39,851	0	1,631	10,122	7,404	16,280	10,128	1,598	998	3,425	254,179
Patrol Sergeants	R	F/D	130,715	38,225	8,631	1,631	15,640	7,404	16,280	10,128	1,598	998	3,425	234,674
Detective Sergeants	R	F/D	136,666	39,006	8,262	1,631	10,122	7,404	16,280	10,128	1,598	998	3,425	235,520
Street Crimes Sergeants	O	F/D	136,666	39,006	8,262	1,631	13,040	7,404	16,280	10,128	1,598	998	3,425	238,438
Officers	R	F/D	107,523	35,180	8,673	1,631	15,640	7,302	16,280	10,128	1,598	998	3,425	208,378
Motorcycle Units	O	D	109,170	35,396	8,673	1,631	7,570	7,404	16,280	10,128	1,598	998	3,425	202,273
School Resource Officers	O	D	106,258	35,014	8,673	1,631	15,640	7,404	16,280	10,128	1,598	998	3,425	207,048
Crime Prevention Officers	O	D	112,082	35,778	8,673	1,631	15,640	7,404	16,280	10,128	1,598	998	3,425	213,637
Detectives	R	F/D	112,082	35,778	8,673	1,631	10,122	7,404	16,280	10,128	1,598	998	3,425	208,119
Street Crimes Detectives	O	D	112,082	35,778	8,673	1,631	13,040	7,404	16,280	10,128	1,598	998	3,425	211,037
Community Service Officer	O	D	72,078	34,933	9,250	1,631	7,283	7,239	16,280	0	1,598	0	3,425	153,717
Clerical Staff, AS IV	R	D	72,078	34,933	9,250	1,005	0	4,941	16,280	0	1,598	0	3,425	143,510
Clerical Staff, AS III	O	D	65,599	33,595	9,250	1,005	0	4,941	16,280	0	1,598	0	3,425	135,692
Clerical Staff, AS II	O	D	55,638	31,537	9,250	1,005	0	4,941	16,280	0	1,598	0	3,425	123,674
			198,375											
Unit	--	F												**Unit Total**
Communications Center	R	F	6,199,784	2,858,782	712,841	178,874	6,267	(1,057,879)	1,447,599	10,128	105,778	998		10,463,172
Hostage Negotiation Team	R	F	22,834	7,345	14,707	214	1,376	1,235	3,256	1,013	818	100		52,897
Major Crimes Investigation	R	F	3,136,190	1,028,509	320,796	156,354	189,677	347,953	463,160	247,630	116,405	24,401		6,031,075
Marine Unit	R	F	696,673	214,169	41,858	121,774	79,575	50,959	94,423	54,691	23,731	5,389		1,383,243
MARR Unit	R	F	768,989	253,420	83,191	78,085	105,077	(595,592)	115,587	61,781	29,050	6,088		905,675
SWAT (TAC-30) Team	R	F	429,374	131,683	265,856	29,161	14,199	25,299	57,793	31,903	14,525	3,144		1,002,937

** **Note:** Fully-loaded 2020 Adopted costs for each type of position, is listed above. The only exceptions are Shoreline & SeaTac, who are not charged Precinct Support Staff, because they have their own. The 2020 Adopted costs (above) reflect the recently settled Guild labor agreement for the years 2017-2021. Salaries are based on COLA's of: 2.25% for 2017, 3.25% for 2018, 4.0% for 2019, and 3.25% for 2020.*

AClouse 5/26/2020