

Yakima County Planning Commission
Findings of Fact and Recommendation
November 9, 2016

IN THE MATTER OF CONSIDERING) **FINDINGS OF FACT AND**
AMENDMENTS TO THE YAKIMA COUNTY) **RECOMMENDATION**
COMPREHENSIVE PLAN - **PLAN 2015**) File No: ZON16-001/SEP16-006
FUTURE LAND USE MAP AND YCC TITLE)
19 ZONING MAP FOR THE TOWN OF)
NACHES AS PART OF 2016 UGA UPDATE)

WHEREAS, in compliance with the Washington State Growth Management Act (GMA), Chapter 36.70A RCW, the Board of Yakima County Commissioners adopted the Yakima County Comprehensive Plan - **Plan 2015**, on May 20, 1997, and adopted development regulations on May 5, 2015; and

WHEREAS, RCW 36.70A.130 requires that Yakima County as a "fully planning" county; shall update its comprehensive plan and development regulations, as necessary, to reflect local needs, new data, and current laws; and

WHEREAS, under RCW 36.70A.130, the plan and development regulations are subject to continuing review and evaluation, but the plan may be amended no more than one time per year; and

16B.10, which sets forth minimum requirements for ensuring adequate public notification; and

and opportunities for comment and participation in the amendment process; and

WHEREAS, the GMA, RCW 36.70A.130(3), requires Yakima County to review its designated UGAs every 10 years and revise them, if necessary, to accommodate the urban growth projected to occur in the succeeding 20-year period; and

comprehensive plan and development regulations
established a public participation program, YCC

WHEREAS, as part of its comprehensive plan and development regulations update process, the County has

WHEREAS, Yakima County is conducting a phased UGA update as part of GMA required 2017 update; and

WHEREAS, four of the fourteen cities and towns (Grandview, Harrah, Mabton, and Naches; ZON2015-006) were updated in 2015 as part of Phase 1 of the UGA update (under Ordinance No. 8-2015); and

WHEREAS, eleven cities and towns (Granger, Harrah (updated), Moxee, Selah, Sunnyside, Tieton, Toppenish, Union Gap, Wapato, Yakima, and Zillah; ZON2016-00001) were reviewed as part of Phase 2 of the UGA update in 2016; and

WHEREAS, a reconsideration of the Town of Naches UGA boundary is now being reviewed as part of Phase 2 of the 2016 UGA update; and

1 WHEREAS, on October 4, 2016 Yakima County provided a 60-Day notice to the
2 Department of Commerce, as required by RCW 36.70A.106 on the proposed Phase 2 of
3 UGA amendments; and
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5 WHEREAS, the proposed UGA map amendments to **Plan 2015** were presented to
6 the Planning Commission for their review on September 14 and October 19, 2016; and
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8 WHEREAS, the Planning Commission conducted properly advertised and noticed
9 public hearing on October 19, 2016, to hear testimony on the UGA map amendment;
10 and
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12 WHEREAS, the Planning Commission held their deliberations on October 19, 2016,
13 immediately after the close of the open record public hearing and on November 2;
14 and
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16 WHEREAS, Yakima County staff prepared a Notice of Adoption of Existing
17 Environmental Documents and Mitigated Determination of Non-Significance for 2016
18 Comprehensive Plan and Zoning Amendments which analyzed the environmental and
19 growth management impacts of all proposed actions and included individual reports
20 on each of the remaining proposed amendments; and
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22 WHEREAS, the Planning Commission, having carefully considered the staff
23 recommendation and the written and oral testimony in its deliberations, moved to
24 accept, reject, or forward to the Board of County Commissioners the proposed map
25 amendments to **Plan 2015**; and,
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27 NOW, THEREFORE, the Yakima County Planning Commission hereby makes and
28 enters the following
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31 I. REASONS FOR ACTION 32

33 The Planning Commission must hold an open record public hearing on any legislative
34 map amendment proposal and provide a recommendation to the Board of Yakima
35 County Commissioners.
36

37 The Town of Naches requested Yakima County reconsider a new Urban Growth Area
38 proposal as part of Phase 2 of the UGA update in 2016.
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40 A staff report for the Naches amendment request was provided to the Planning
41 Commission that identified specific issues and recommended approval of the proposed
42 amendments. Following public testimony and deliberations, the Planning Commission
43 made a determination on the proposed amendments based on the goals, policies and
44 intent of **Plan 2015**.
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II. FINDINGS OF FACT

-1-

Yakima County adopted **Plan 2015** on May 20, 1997. The plan was designed to integrate SEPA and GMA consistent with the provisions of WAC 197-11- 210 through 197-11-235. **Plan 2015's** Volume 1, Chapter I, the Policy Plan and Chapter III, the Environmental Analysis Element along with Volume 3 Appendices, along with the *Notice of Adoption of Existing Environmental Documents and Mitigated Determination of Non-Significance for 2016 Comprehensive Plan and Zoning Amendments*, provide the environmental evaluation and documentation required under SEPA.

-2-

Yakima County must periodically review and, if needed, revise its comprehensive plan and development regulations - every eight years - to ensure that they comply with the GMA, as per the schedule provided in RCW 36.70A.130. This review also requires Yakima County to evaluate the County's fourteen designated urban growth areas (UGAs) by using the Washington State Office of Financial Management's population forecasts, the County's 20-year population allocations and a detailed land capacity analysis process.

-3-

Yakima County staff prepared a *Notice of Adoption of Existing Environmental Documents and Mitigated Determination of Non-Significance for 2016 Comprehensive Plan and Zoning Amendments*, which analyzed the environmental and growth management impacts of all proposed actions and included individual reports on each of the proposed amendments.

-4-

The Planning Commission has concluded its UGA review of thirteen of the County's fourteen cities and towns, with the Town of Naches finalizing the GMA required UGA review process.

-5-

On September 14, 2016 the Yakima County Planning Commission held a properly advertised Study Session on the proposed changes to Naches (ZON2016-001) UGA boundary.

-6-

The Planning Commission accepted oral and written comments at a properly advertised public hearing held October 19, 2016 and November 2 on the proposed UGA boundary amendments (ZON2016-001) for Naches.

-7-

The hearing was closed on November 2, 2016 and the Planning Commission immediately moved to deliberate and make recommendations on the proposed amendments.

-8-

1 The Planning Commission finds that the proposed UGA expansion by the Town of
2 Naches meets their economic strategy for industrial land development as required by
3 GMA and Yakima County Comprehensive Plan – **Plan 2015**.

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5 -9-

6 The Planning Commission finds that the proposed UGA expansion for the existing
7 agricultural industrial development meets the necessary UGA expansion criteria and
8 the Yakima County Comprehensive Plan – **Plan 2015** Agricultural De-designation Criteria
9 for the following reasons:

- 10
- 11 • The soils criterion of Ag de-designation was inappropriately interpreted by
12 Planning Staff and should have been considered a “yes” score, thus providing
13 the necessary 8 “yes” answers to de-designate the property. Even though the
14 soils on property are listed as prime soils in the Yakima County Soil Survey, the
15 property is predominately covered by buildings, parking facilities and other
16 impervious surfaces, thus making the quality of the soils immaterial to the
17 proposal. In addition, the intention of Ag de-designation criteria is to protect the
18 inappropriate conversion of Ag land to non-agricultural uses. The proposed UGA
19 expansion will protect the existing Ag Industrial use.
 - 20 • The proposed UGA expansion allows the existing Ag Industrial use, which
21 currently promotes and supports the area’s agricultural operations, gain access
22 to municipal sewer from the Town of Naches. Access to municipal sewer will
23 allow the Ag Industrial use to expand its operation, thus achieving the overall
24 intent behind GMA’s goal of enhancing natural resource based industries.
 - 25 • On the proposal to include three parcels adjacent to the current city limits,
26 expanding Naches’ UGA by 92.35 acres (as shown in Exhibit 1 attached):

27
28 **Therefore, the Planning Commission recommends in a 5 to 0 vote the proposed**
29 **UGA boundary and zoning changes be approved as identified in the town’s staff**
30 **report in Exhibit 1, contingent on the submittal of a city adopted capital facilities**
31 **plan or addendum acceptable to Yakima County prior to BOCC approval.**
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III. RECOMMENDATION

- 1) By motion and vote described in II. Findings of Fact, the Planning Commission recommends that the Board of Yakima County Commissioners approve this years proposed amendments.

Voting in favor of the findings and recommendation:

Zella West, Chair

Ed Burns, Vice Chair

Michael Shuttleworth

Nancy Charron

Ashley Garza

John Crawford

Jerry Craig

Attest:

Thomas D. Carroll,
Secretary

Voting against the findings and recommendation:

Dated: November 9, 2016

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Exhibit 1
Proposed UGA Changes

**Yakima County
Public Services Department
Planning Division**

**Yakima County's 2017 Review of its UGAs and Permitted Densities
(as required by the Growth Management Act)**

**Urban Growth Area for
Town of Naches**

Staff Report Addendum

November 2, 2016

Staff contact: Tommy Carroll, Long Range/Environmental Section Manager
Thomas.carroll@co.yakima.wa.us, 574-2498

1. Introduction

The October 14, 2015 staff report developed by Yakima County staff outlined the Growth Management Act (GMA) requirements for the 2017 Urban Growth Area (UGA) update, a Land Capacity Analysis (LCA) for the Town of Naches, the Town of Naches proposed UGA changes, and the Yakima County Planning Staff's and Yakima County Planning Commission's recommendations. In late 2015, the Board of Yakima County Commissioners (BOCC) reviewed and approved changes to the Town of Naches' Urban Growth Area (UGA), based in part on the October 14, 2015 staff report and public testimony at their open record public hearing.

This addendum is to the October 14, 2015 staff report and is in response to a new proposal from the Town of Naches to expand of their existing UGA boundary to include three parcels adjacent to their current city limits. This expansion would allow the existing industrial use to connect to the city sewer. This expansion would allow the existing industrial use to expand its operation, bringing in additional jobs to the area. Unlike non-industrial lands (residential, commercial), the Land Use Element of Yakima County's Comprehensive Plan - **Plan 2015** (see Attachment 3), states that the amount of land needed for future industrial land "is based on the city's economic development strategy and is not contingent on future population." Therefore, this addendum will address the results of the Land Capacity Analysis, with an emphasis on the industrial land component and ultimately provide a staff recommendation on Naches' proposal to the Yakima County Planning Commission.

The Growth Management Act (GMA) provides:

"(a) Each county that designates urban growth areas under RCW 36.70A.110 shall review, according to the schedules established in subsection (5) of this section, its designated urban growth area or areas, and the densities permitted within both the incorporated and unincorporated portions of each urban growth area. In conjunction with this review by the county, each city located within an urban growth area shall review the densities permitted within its boundaries, and the extent to which the urban growth occurring within the county has located within each city and the unincorporated portions of the urban growth areas.

"(b) The county comprehensive plan designating urban growth areas, and the densities permitted in the urban growth areas by the comprehensive plans of the county and

each city located within the urban growth areas, shall be revised to accommodate the urban growth projected to occur in the county for the succeeding twenty-year period ...”
[RCW 36.70A.130(3)]

Subsection (5) of section RCW 36.70A.130 requires Yakima County and its cities to complete these Urban Growth Area (UGA) reviews and revisions by June 30, 2017.
[RCW 36.70A.130(5)(c)]

The mandates mentioned above are being met by two reports:

- a. Report 1 – Yakima County Population and Employment Projections and Allocations was issued on July 14, 2015 and establishes the number of people to accommodate in each of the County’s 14 UGAs in year 2040. Attachment 2 is the excerpt from Report 1 showing the population projections for Naches.
- b. Report 2 – UGA Land Capacity Analysis identifies the amount of land each of the County’s 14 cities has for future growth within their Urban Growth Areas. This staff report includes the Land Capacity Analysis for Naches’ UGA (Attachment 3) and is part of Yakima County’s efforts to meet its obligations under the RCWs cited above. It constitutes a recommendation to the County Planning Commission as well as the County’s initial “show-your-work” exhibit as required by the GMA.

2. Review of Urban Growth Area: Land Capacity Analysis (LCA)

a. Overview

As stated in the Introduction Section above, Naches LCA was originally conducted in 2015 as part of the initial UGA review. However, their recent proposal to expand their UGA to include new industrial land requires a new LCA to be conducted. A LCA is an essential component in reviewing a UGA. An LCA is a quantitative estimate of how much land a city will require as it grows over the succeeding 20-year period. It begins with consultation between a county and its cities and towns to select a population growth projection from a range of population growth projections provided by the state Office of Financial Management (OFM). The population projection, together with a county employment growth forecast, is then allocated primarily to UGAs, to assist in sizing UGAs to accommodate future urban growth.

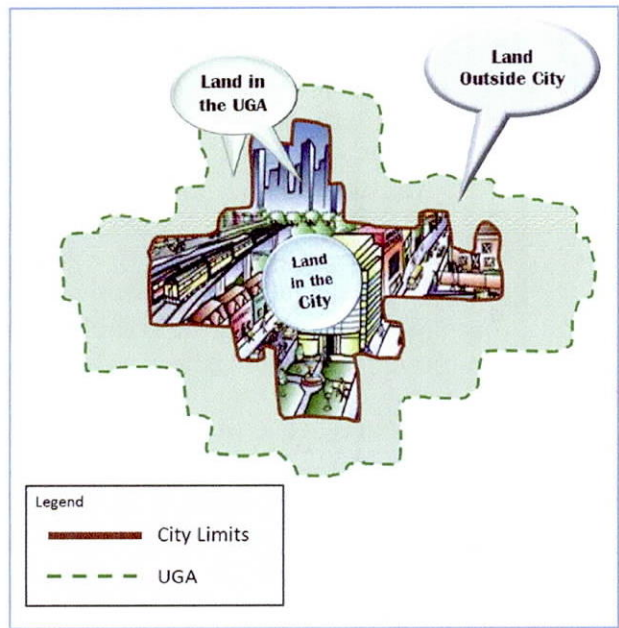
After reviewing OFM’s most recent population projections for Yakima County, the Yakima County Planning Division issued a draft report on January 16, 2015 that allocated the projected population and employment growth among the county’s 14 cities. In sharing the report with the county’s cities and the Yakima Valley Conference of Governments, the Planning Division met with and requested comments on the draft allocations. After considering all comments received, the Planning Division issued a revised report dated July 14, 2015. The specific population projections for the Town of Naches are shown in Attachment 2. This second LCA report is based on the 2015 revised population allocations.

After reviewing OFM’s most recent population projections for Yakima County, the Yakima County Planning Division issued a draft report on January 16, 2015 that allocated the projected population and employment growth among the county’s 14 cities. In sharing the report with the county’s cities and the Yakima Valley Conference of Governments, the Planning Division met with and requested comments on the draft allocations. After considering all comments received, the Planning Division issued a revised report dated July

14, 2015. The specific population projections for the Town of Naches are shown in Attachment 2. This second LCA report is based on the revised population allocations.

Three terms will be used throughout this analysis. They will be used to describe potential growth as follows:

- 1) Land in city. This is used to describe lands within the city limit.
- 2) Land outside city. This is used to describe the land in the UGA over which the county has jurisdiction.
- 3) Land in UGA. This is used to describe the area inside the city limits AND the land outside the city. It could also be described as item 1 + 2 = 3.



The LCA quantifies the amount of land needed for Naches's growth according to the analytical process (see Attachment 1) outlined in the "Urban Lands" section in the Land Use Element of Yakima County's Comprehensive Plan - *Plan 2015*. This acreage is then compared to the amount of vacant land currently within the UGA to determine if there is a surplus or a deficit of vacant land for future growth to year 2040. The general calculation is outlined below:

$$\begin{aligned}
 &\text{Acres Needed for Future Growth in the UGA}^1 \\
 &\quad - \text{Acres Currently Vacant in the UGA}^2 \\
 &= \text{Surplus (or Deficit) of Vacant Land in the UGA}
 \end{aligned}$$

b. Quantity of Land Calculations for Non-Industrial Uses

Yakima County's Division of Geographic Information Services (GIS) determined the current acreage of developed residential, commercial & retail, and community facilities. GIS also determined the acreage of current vacant land and partially vacant³ land in each zoning district to arrive at the figures used in the LCA spreadsheet (Attachment 3). These GIS data are reported and depicted geographically in Attachment 4.

The Land Capacity Analysis calculations are described below. The spreadsheet in Attachment 3 ("UGA Land Capacity Analysis") performs the calculations and provides additional information.

¹ Acres needed for Future Growth = Vacant acres needed for: Residential uses + Commercial uses + Community Facilities + Streets.

² Acres currently vacant = Vacant acres zoned or owned for: Residential uses + Commercial uses + Community Facilities (this excludes Environmentally Constrained lands and Tribal lands).

³ Parcels classified as "partially vacant" are those greater than one acre and have more than \$10,000 in assessed improvements. For such parcels GIS counts one acre as developed and counts the remainder acreage as vacant (i.e., available for development). Note: Not all parcel meeting these criteria are classified as partially vacant. Aerial photo interpretation, local knowledge, and city input are used to limit this classification mostly to residential parcels.

1. Population and Households Analysis: Based on Naches's projected 2015-2040 population growth, this analysis estimates 75 additional households will be added to the city's population by the year 2040.

2040 population forecast for city (County Planning)	1,084 people
2015 population in city (OFM's April 1 estimate)	830 people
Population increase in city 2015-2040	254 people
<u>Average household size in city (2010 Census)</u>	<u>2.51 people</u>
Additional households in city 2015-2040 (254 ÷ 2.51)	101 households

2. Future Residential Land Need: The acreage needed for future residential growth through 2040 was calculated by assuming an average future density of 5.1 dwelling units per acre (i.e., 8,500 sq. ft. for each household) and multiplying this amount by the number of projected new future households:

$$8,500 \text{ sq. ft.} \times 101 \text{ households} = 20 \text{ Acres}$$

3. Future Commercial & Retail Land Need: The acreage needed for future commercial and retail growth through 2040 was calculated by multiplying the projected population increase by the current per capita acreage of developed commercially-zoned lands within the city after subtracting the acreage classified for community facilities (as determined by GIS analysis):

$$254 \text{ people} \times .0494 \text{ acres per capita} = 13 \text{ Acres}$$

4. Future Community Facilities Land Need: The acreage needed for future community facilities growth through 2040 was calculated by multiplying the projected population increase by the current per capita acreage of developed community facilities land within the city (as determined by GIS analysis):

$$254 \text{ people} \times .1193 \text{ acres per capita} = 30 \text{ Acres}$$

5. Future Streets Land Need: The acreage needed for future rights-of-way to accommodate streets and utilities through 2040 was calculated by multiplying the acreage needed for future residential, commercial & retail, and community facilities by 15%:

Residential acreage needed	20 Acres
+Commercial/retail acreage needed	13 Acres
+Community facilities acreage needed	30 Acres
=Subtotal	63 Acres
Total streets acreage needed (Subtotal x 0.15)	10 Acres

6. Land Capacity Analysis for Non-Industrial Uses

Next, the needs for land identified above are compared with the amount of existing vacant land to determine if there is currently a surplus or a deficit of vacant land within the Naches' and the UGA to accommodate projected growth through 2040. The calculations are shown in Attachment 3 under Section "6 – Land Capacity Analysis" and summarized below:

Total amount of vacant land needed in UGA for future growth (excluding industrial growth): Adding the needed acres from the categories above results in the total acreage calculated below:

Acres needed for future residential uses ⁴	23 Acres
+Acres needed for future commercial & retail uses ⁴	15 Acres
+Acres needed for future community facilities ⁴	35 Acres
=Total vacant acres needed for future non-industrial uses ⁴	73 Acres

Using the figures in Attachment 3, Table 1 summarizes whether each zoning group has a surplus or a deficit of vacant land to accommodate growth through 2040:

Table 1: Land Capacity Analyses (LCA) Summary – Excluding Industrially-zoned Land				
Zoning Group	Acreage Within City Limits	Surplus/Deficit Within City Limits ⁴	Outside City Limits & Within Current UGA	<i>Total: Within City Limits and Within Current UGA⁴</i>
Residential	Vacant: 37 acres	Surplus: 14 acres	Vacant: 82 acres	<i>Surplus: 96 acres</i>
Commercial	Vacant: 56 acres	Surplus: 41 acres	Vacant: 22 acres	<i>Surplus: 63 acres</i>
Community Facilities	Vacant: 19 acres	Deficit: 16 acres	Vacant: 4 acres	<i>Deficit: 12 acres</i>
Total of above Zoning Groups	Vacant: 112 Acres	Surplus: 39 acres	Vacant: 108 acres	<i>Surplus: 147 acres</i>

Using the figures in Attachment 3, Table 2 summarizes whether the city and the UGA have a surplus or a deficit of vacant land to accommodate growth through 2040:

Table 2: LCA Summary – In City and In UGA – Excluding Industrially-zoned Land
Current UGA
Capacity for Growth within City:
112 (Acres of currently vacant land in City)
- 73 (Acres needed for growth)
= 39 (Surplus acres in City)
Capacity for Growth in the Current UGA :
108 (Acres of currently vacant land outside the city)
+ 112 (Acres vacant within City)
- 73 (Acres needed for growth)
= 147 (Surplus vacant acres within the Current UGA)

Computed Market Choice Factor (MCF) and “Years of Growth” (excluding Industrial growth)

One way of quantifying the surplus (or deficit) of vacant land in a city and within its UGA is to express the surplus (or deficit) as a percentage of the amount of vacant land

⁴ Including associated streets

that is needed for growth over the 25-year period from 2015 to 2040. For example, if a city has 120 vacant acres and needs 100 vacant acres for future growth, it has 20% more vacant land than needed for growth. So the Computed MCF is 20%, as calculated below:

$$[(\text{acres currently vacant}) \div (\text{acres needed for future growth})] - 1.00 = \text{Computed MCF \%}$$

$$\text{Example: } [120 \text{ acres} \div 100 \text{ acres}] - 1.00 = 0.20 = 20\%$$

An additional way of quantifying the surplus (or deficit) of vacant land available for future growth is to express the surplus (or deficit) as the number of years it would take to develop all the vacant land at the projected future growth rate. This metric is a function of the MCF. For example, if a city has a 0% MCF, this means that the acres of vacant land are equal to the number of acres needed for growth over the 25-year period from 2015 to 2040, so it has enough land for 25 years of growth, as calculated below. If a city has a MCF of 100%, this means that it has twice the number of vacant acres available as are needed for 25 years of growth, so it has enough vacant land for 50 years of growth, as calculated below:

$$(\text{Computed MCF} + 1) \times 25 \text{ years} = \text{years of growth available}$$

$$\text{Example 1: } (0\% \text{ MCF} + 1) \times 25 \text{ years} = 25 \text{ years of growth available}$$

$$\text{Example 2: } (100\% \text{ MCF} + 1) \times 25 \text{ years} = (1 + 1) \times 25 \text{ years} = 50 \text{ years of growth available.}$$

The figures for both the “MCF” and “years of growth” metrics for Naches are provided in Table 3.

Table 3: Naches’ Computed MCF and Years of Growth Available - Excluding Industrially-zoned lands			
	Within the city	Outside the city and within the Current UGA	Within the Current UGA
Computed MCF	53%	N/A	201%
Years of growth available	39 years	37 years	75 years

c. Future Industrial Land Needs

As provided by the analytical process (see Attachment 1) outlined in the “Urban Lands” section in the Land Use Element of Yakima County’s Comprehensive Plan - **Plan 2015**, the amount of land needed for future industrial uses “is based on the city’s economic development strategy and is not contingent on future population.”

The GIS analysis provides the following current acreages of industrially-zoned lands (Attachment 3, Section “7 – Future Industrial Land Need”):

Current developed industrially-zoned land in city	1 Acre
Current developed industrially-zoned land outside city	26 Acres
Current vacant industrially-zoned land in city	1 Acres
Current vacant industrially-zoned land outside city	28 Acres
Industrial acres to add to UGA	91 Acres

Industrial acres to remove from UGA	0 Acres
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**Differences in total values between this chart and the spreadsheet in Attachment 1 are due to rounding.*

Naches is proposing to add 91 acres to the UGA and zone the land industrial. The land is currently developed with an agricultural industrial use, with intentions to expand and ultimately connect to the Town of Naches' sewer line.

A map showing the current configuration and total land area within the UGA is included as Attachment 4. Proposed changes to the boundary and land area within the UGA are shown in Attachment 5.

3. **Review of Densities Permitted in the UGA**

In addition to reviewing Naches's UGA as done above, RCW 36.70A.130(3)(a) requires Yakima County to review the densities permitted within both the incorporated and unincorporated portions of the UGA.

The Town of Naches has five zoning districts within its city limits. The Town of Naches zoning districts are: R-1 (Single Family Residential), R-2 (Single and Two Family Residential), L-1 (Light Industrial), GB (General Business), and PLI (Public Lands/Institutions). The Land Capacity Analysis is based on residential zones, which are generally the only zoning districts with density requirements.

The residential zoning districts and corresponding densities are as follows:

Town of Naches Zoning (17.04 Naches Development Regulations)		
<i>Zoning District</i>	<i>Minimum Lot Size</i>	<i>Density</i>
R-1 (Residential)	7,200 sq. ft. or; 8,200 sq. ft.	Single-Family Residence or; Duplex
R-2 (Residential)	5,000 sq. ft. 8,200 sq. ft. 10,200 sq. ft. 12,200 sq. ft.	Single-Family Residence Duplex Triplex Fourplex
Yakima County UGA in the Urban Growth Area (YCC Title 19)		
<i>Zoning District</i>	<i>Minimum Lot Size</i>	<i>Density</i>
R-1 (Single Family Residential)	4,000 – 10,000 sq. ft. (depending on use) 7,000 sq. ft. for single family residence	7 units per acre

There are currently 37 acres of vacant Residential zoned land in the town of Naches. If the vacant Residential zoned land is developed with single family residents on 7,200 sq. ft. lots within the city limits, 224 new single family homes could be developed within the city limits. If R-2 zoned land is developed to the highest density, the number would be higher.

Naches currently has 82 vacant acres in the Urban Growth Area outside city limits. All residential land in Naches's UGA is in the County R-1 zone, which allows a maximum density of 7 units per acre. Built to the maximum density, the current UGA could accommodate 574 new homes, which far exceeds identified need for 101 homes in the entire UGA.

Yakima County's land capacity analysis assumes an average lot size of 8,500 square feet, or 5.1 dwelling units per acre, when determining residential land needs. This number is based on

historical practice and the assumption that land is rarely developed to capacity inside cities or within UGAs. Unless there are zoning district requirements for property to be developed to the maximum density (which Naches does not have) it is unlikely that the city or UGA will develop to the maximum density in residential zones.

4. City/County Collaboration

County staff met with Naches's representatives on several occasions in the summer of 2015 to review and discuss the County's land capacity analysis, the County's proposed future land use designations, the review of permitted densities and Naches's planning issues. The Town of Naches requested 16 acres of additional Industrial, 14 acres of additional Residential, and 21 acres of additional Commercial land to be added to the UGA (these acreages are rounded numbers). In July, 2015 the Planning Commission held public hearings on Naches proposal and presented their recommendation to the BOCC in October of that year. In December 2015, the BOCC took public testimony on the Town of Naches' proposed Urban Growth Area (UGA) changes and approved their recommendations with a number of modifications. Yakima County's review of the Naches UGA in 2015 satisfied the County's GMA update obligation for Naches, however in mid-2016 Naches requested that the County re-review their UGA for the possible inclusion of additional industrial land in their UGA. Yakima County is currently working the final phase of the required UGA review, which includes 11 of 14 cities and towns in the County. Adding Naches to this list brings the total of cities and towns under review to 12 of 14.

Naches is requesting that 92.35 acres of agriculturally zoned land adjacent to its UGA and town limits to be included in the UGA. The 91.35 acres of AG land is currently developed with an Ag Industrial use. The remaining 1 acre is a developed residential lot. The rationale for including the 91.35 acres is to allow the current land use to expand its operation, however to do so, the business will need to connect to municipal sewer to handle its waste disposal needs. While outside the UGA the Ag Industrial use will not be able to connect to municipal sewer. Though outside the town's UGA this business is a major employer in the Naches area and is seen as an important part of Naches' economic strategy.

5. Major Rezone and Plan Amendment Review Criteria

YCC 19.36.040 provides that amendments to the zoning map that are contingent upon legislative approval of a comprehensive plan amendment shall be considered a major rezone and are subject to the procedures outlined in YCC 16B.10. Specifically, YCC 16B.10.090 requires that rezones completed as part of the plan amendment process shall be reviewed against the criteria as for plan amendments in Section 16B.10.095; and 16B.10.095 provides the following approval criteria when considering proposed amendments to Yakima County's comprehensive plan:

(1) The following criteria shall be considered in any review and approval of amendments to Yakima County Comprehensive Plan Policy Plan Maps:

- (a) The proposed amendment is consistent with the Growth Management Act and requirements, the Yakima County Comprehensive Plan, the Yakima Urban Area Comprehensive Plan and applicable sub-area plans, applicable city comprehensive plans, applicable capital facilities plans and official population growth forecasts and allocations;*
- (b) The site is more consistent with the criteria for the proposed map designation than it is with the criteria for the existing map designation;*
- (c) The map amendment or site is suitable for the proposed designation and there is a lack of appropriately designated alternative sites within the vicinity;*
- (d) For a map amendment, substantial evidence or a special study has been furnished that compels a finding that the proposed designation is more consistent with comprehensive plan policies than the current designation;*

- (e) *To change a resource designation, the policy plan map amendment must be found to do one of the following:*
 - (i) *Respond to a substantial change in conditions beyond the property owner's control applicable to the area within which the subject property lies; or*
 - (ii) *Better implement applicable comprehensive plan policies than the current map designation; or*
 - (iii) *Correct an obvious mapping error; or*
 - (iv) *Address an identified deficiency in the plan. In the case of Resource Lands, the applicable de-designation criteria in the mapping criteria portion of the land use subchapter of Yakima County Comprehensive Plan, Volume 1, Chapter 1, shall be followed. If the result of the analysis shows that the applicable de-designation criteria has been met, then it will be considered conclusive evidence that one of the four criteria in paragraph (e) has been met. The de-designation criteria are not intended for and shall not be applicable when resource lands are proposed for re-designation to another Economic Resource land use designation;*
- (f) *A full range of necessary public facilities and services can be adequately provided in an efficient and timely manner to serve the proposed designation. Such services may include water, sewage, storm drainage, transportation, fire protection and schools;*
- (g) *The proposed policy plan map amendment will not prematurely cause the need for nor increase the pressure for additional policy plan map amendments in the surrounding area.*

Findings: The proposal is *mostly consistent* with the above criteria. The site is already considered an industrial land use even though located in the Agricultural Zoning District. Yakima County's Comprehensive Plan and Development Regulations allow agricultural industrial uses in the Agricultural Zoning District under certain circumstances, typically due to the necessity for the agricultural product processing and packing to be located as close to where the product is grown as necessary. Though allowed in the Ag Zone, these types of land uses tend to outgrow their current location, as it pertains to their need for adequate public facilities (roads, sewer, water, fire protection, parking, etc.). The industrial zones would allow more flexibility to the current property owner and allow for sewer to be extended to the property. Currently there is a grant request pending on this property that would pay for upgrades to the Town of Naches' sewer facility and extend the sewer to the subject property. Inclusion in the UGA is necessary for the improvements to be made. Representatives for the Town of Naches have expressed no desire for additional UGA land beyond the area proposed and would like to see the surrounding agricultural land uses stay in the Ag Zone.

- (2) *The following criteria shall be considered in any review and approval of changes to Urban Growth Area (UGA) boundaries:*
 - (a) *Land Supply:*
 - (i) *The amount of buildable land suitable for residential and local commercial development within the incorporated and the unincorporated portions of the Urban Growth Areas will accommodate the adopted population allocation and density targets;*
 - (ii) *The amount of buildable land suitable for purposes other than residential and local commercial development within the incorporated and the unincorporated portions of the Urban Growth Areas will accommodate the adopted forecasted urban development density targets within the succeeding twenty-year period;*
 - (iii) *The Planning Division will use the definition of buildable land in YCC [16B.02.045](#), the criteria established in RCW [36.70A.110](#) and .130 and applicable criteria in the Comprehensive Plan and development regulations;*
 - (iv) *The Urban Growth Area boundary incorporates the amount of land determined to be appropriate by the County to support the population density targets;*
 - (b) *Utilities and services:*
 - (i) *The provision of urban services for the Urban Growth Area is prescribed, and funding responsibilities delineated, in conformity with the comprehensive plan,*

including applicable capital facilities, utilities, and transportation elements, of the municipality;

- (ii) Designated Ag. resource lands, except for mineral resource lands that will be reclaimed for urban uses, may not be included within the UGA unless it is shown that there are no practicable alternatives and the lands meet the de-designation criteria set forth in the comprehensive plan.*

Findings: Yakima County staff analysis above supports the conclusion that this proposal is consistent with most of the above criteria, with exception of the Ag de-designation criteria. The Ag de-designation criteria found in the Land Use Element of **Plan 2015** was developed to ensure that lands primarily devoted to or important for the long-term commercial production of agriculture would not be converted to rural or non-resource uses without the proper consideration of the goals and requirements of the GMA. GMA requires counties to protect and designate agricultural lands and at the same also requires counties to designate UGA. These two requirements can compete with each other if a city needs to add to its current UGA boundary and the only option is land designated for agriculture, which is exactly what the case is here with the Naches' proposal.

In 2002, Yakima County developed the Ag de-designation criteria to protect against the inappropriate conversion of designated agricultural land to rural or other non-resource land uses. The criteria was designed to protect agricultural lands that are producing high-value crops (orchard, vineyards, hops, specialty crops, dairies, lands with prime soils and irrigation, etc.). This meant that an agricultural parcel located adjacent to an existing UGA boundary would be treated the same as a parcel located ten miles from a UGA boundary. However, the agricultural operation adjacent to the UGA has different levels of development pressure than the one located ten miles out. The de-designation criteria does provide measures to consider the location of agricultural parcel in relation to an UGA, but that measure is just one of ten different criterion to consider and each have the same weight. The design of the de-designation's analytical process heavily favors agricultural land and limits the chances of de-designating agricultural land for UGA expansions.

Over the last dozen or so years Yakima County made UGA boundary changes by disregarding **Plan 2015's** agricultural de-designation criteria, because its overall design created a conflict between two competing GMA goals (protection of agricultural land and the designation of UGAs). To make matters worse there are thousands of acres of designated agricultural land directly adjacent to existing UGA boundary throughout the County. This places a significant burden on a city's ability to grow if the only land they can expand their UGA boundary would ultimately fail the agricultural de-designation criteria. Therefore, the County choose to de-designate for UGA expansion purposes, because the UGA requirements found in both GMA and **Plan 2015** required the County to expand UGA's if the UGA requirements were met. GMA lacks the necessary guidance on what a County should do if there is a conflict between two competing GMA goals.

As part of the 2017 GMA update Yakima County is proposing changes to the agricultural de-designation criteria to allow prospective agricultural properties to be de-designated if a city's proposed UGA expansion meets both the GMA and **Plan 2015's** UGA expansion criteria. The Naches proposal is a little different, but shares similar aspects as discussed above. The proposed expansion area is zoned Agricultural and is adjacent to the existing UGA boundary, however the difference is the expansion area is already developed with

an industrial agricultural use that is in need of public services to expand its operation. This is not a 90 acre hopfield or orchard being removed from production to put in the UGA for residential uses. Adding this property to the UGA allows the property owner to expand its agricultural operation under the County's industrial zoning, which ultimately may prove to be the most appropriate zoning anyway since this is an industrial use.

The revised de-designation criteria will be presented to the Planning Commission as part of their review of the updated land use element later in 2016 or early 2017.

- (3) *Land added to or removed from Urban Growth Areas shall be given appropriate policy plan map designation and zoning by Yakima County, consistent with adopted comprehensive plan(s).*

Findings: Land will be classified according to Yakima County's Urban Growth Area future land use designations.

- (4) *Cumulative impacts of all plan amendments, including those approved since the original adoption of the plan, shall be considered in the evaluation of proposed plan amendments.*

Findings: A table showing the cumulative impacts of all proposed amendments being considered in 2016 will be provided as part of the SEPA analysis (file # SEP2016-00006).

- (5) *Plan policy and other text amendments including capital facilities plans must be consistent with the GMA, SMA, CWPP, other comprehensive plan goals and policies, and, where applicable, city comprehensive plans and adopted inter-local agreements.*

Findings: Not applicable. The changes to Naches's UGA are map amendments rather than policy or text amendments.

- (6) *Prior to forwarding a proposed development regulation text amendment to the Planning Commission for its docketing consideration, the Administrative Official must make a determination that the proposed amendment is consistent with the GMA, CWPP, other comprehensive plan goals and policies, and, where applicable, city comprehensive plans and adopted inter-local agreements.*

Findings: Not applicable. The changes to Naches's UGA are map amendments rather than policy or text amendments.

6. Conclusions

- a. The County's Land Capacity Analysis for Naches calculates a surplus of vacant Residential and Commercial land within the current UGA for all non-industrial uses through 2040. The LCA shows a deficit of Community Facilities land within the current UGA. This proposal is for Industrial land which is based on the city's economic development strategy and is not contingent on future population or the LCA results.
- b. Request to add the proposed area to the UGA is supported by the city's industrial strategy and capital facilities planning, including providing city services (sewer) to be extended to the industrial site.
- c. The 1 acre residential property is currently developed and is included in the proposed expansion area because it is surrounded by the proposed industrial lot. The addition of the 1 acre developed property has no growth potential and has no bearing on the results of the LCA.

7. Recommendations

Yakima County planning staff recommendations to the Town of Naches' proposed UGA changes are outlined in the Table below: (Map showing each area is included as Attachment 6.)

Location (as shown in Attachment 6)	Naches Proposal					County Planning Recommendation
	Add To UGA	Remove From UGA	Current Land Use Designation	Proposed Land Use Designation	Proposed Zone	
Area 1	91.35 Acres		Agricultural Resource	Urban Industrial	M-1 Light Industrial	Approval
Area 2	1.0		Agricultural Resource	Urban Residential	R-1 Zone	Approval

8. Planning Commission Recommendations

On November 2, 2016 the Planning Commission deliberated and made a recommendation to the Board of Yakima County Commissioners for approval of the Town of Naches' proposed UGA expansion as set out in the Table below. The Planning Commission also recommended to change the proposed zone for Area 2 to Suburban Residential zoning, to allow for future industrial expansion on the existing 1.0 acre lot if the existing residential use was ever removed.

Location (as shown in Attachment 7)	Naches Proposal					County Planning Recommendation
	Add To UGA	Remove From UGA	Current Land Use Designation	Proposed Land Use Designation	Proposed Zone	
Area 1	91.35 Acres		Agricultural Resource	Urban Industrial	M-1 Light Industrial	Approval
Area 2	1.0		Agricultural Resource	Urban Residential	SR Zone	Approval

Attachments:

1. **Plan** 2015's description of the analytical process for the UGA Land Capacity Analysis
2. County's Population Projection for Naches
3. UGA Land Capacity Analysis (spreadsheet)
4. Naches's UGA Analysis 2015 (map)
5. Recommended changes to Naches's UGA boundary and plan designations (map)
6. Proposed Comprehensive Plan Designations and Proposed UGA – Specific Areas (map)
7. Proposed Planning Commission Changes to the Naches Proposal

Urban Lands

Urban Growth Areas

Purpose The intent of the *Urban Growth Areas* land use category is to implement the Growth Management Act's Planning Goal 1: "Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner." In determining areas to be set aside for future urbanization, the County and cities mutually endorsed a County-Wide Planning Policy. It states that areas designated for urban growth should be determined by preferred development patterns, residential densities, and the capacity and willingness of the community to provide urban governmental services. The Urban designation is intended to include land that is characterized by urban growth or will be needed for urbanization, consistent with forecasted population growth and the ability to extend urban services. The Urban Growth Area designation is intended to establish the area within which incorporated cities and towns may grow and annex over the next twenty years. Yakima County's Urban Growth Area land use category is also intended to implement Washington Administrative Code, which states that "the physical area within which that jurisdiction's vision of urban development can be realized over the next twenty years." Specific discrete plan designations such as residential, open space, urban reserve, commercial or industrial are found in the respective jurisdiction's comprehensive, subarea or neighborhood plan.

General Description In general, an urban growth area extends from each of Yakima County's 14 cities and towns. Since the cities have historically developed in the valley floors, they tend to be surrounded by irrigated agriculture, and are likely to include geologically hazardous areas, wetlands and other wildlife

habitat, or river gravels suitable for mining. "Urban growth" means that land is used so intensively for buildings, structures, and impermeable surfaces that viable agriculture, forestry or mining is not feasible. Urban governmental services are either available, or could be provided without excessive public cost. Urban governmental services typically include water and sewer systems, street cleaning services, fire and police protection services, and public transit services. Based on their respective comprehensive, subarea or neighborhood plans, cities and other service providers must be able to demonstrate both ability and willingness to supply designated urban areas with these services within the 20 year planning period.

In evaluating the quantity of land necessary for urban growth, the following analytical process should be followed:

1. **Determine how much housing is necessary for 20 years of growth.**

Subtract the City's current year population from the projected 20 year population figure to determine the additional number that represents 20 years of growth. Based on a city's average household size, calculate the number of additional dwelling units to allow for.

2. **Determine the necessary residential acreage.**

Determine the desired and appropriate housing densities in collaboration with the cities. Calculate how many acres are needed to accommodate the number of new dwelling units based on the desired and appropriate densities. A percentage can be added to allow for market choice and location preference.

3. **Determine the necessary commercial and retail acreage.**

Divide the existing commercial and retail acreage by the current population to arrive at a commercial/retail acreage per capita figure. Multiply this per capita number by the additional population identified in Step #1. This will give you the amount of additional commercial/retail acreage needed. A percentage can be added to allow for market choice and location preference.

Approval of any UGA expansion by Yakima County will be subject to adoption of an adequate and appropriate Capital Facilities Plan by the respective elected legislative body to ensure necessary facilities and services will be provided to the entire expanded UGA within the 20 year period.

4. Determine the net amount of total additional acreage needed for non-industrial uses.

Determine the currently available undeveloped acreage within the existing UGA for both residential and commercial/retail. Subtract these figures from the acreage identified in Steps # 2 and #3 to determine if acreage is needed for UGA expansion for residential or commercial/retail. Factor in additional acreage needed for open space, critical areas, parks, and other public facilities such as schools and libraries based on appropriate level of service standards. Add appropriate acreage to allow for streets.

5. Identify areas needed for Industrial zoning.

Industrial zoning is based on the city's economic development strategy and is not contingent on future population.

6. Identify areas that are desired and appropriate for expansion.

Identify the areas desired for UGA expansion based on the amount of acreage needed as identified in Steps #4 and #5. Ensure the requisite acreage is accurately allocated to residential, commercial/retail, and industrial. Areas desired for expansion should avoid Agricultural and Mineral Resource areas if possible. If Resource areas are unavoidable, justification for encroaching into the Resource area will be required.

7. Capital Facilities Plan.

Naches

Table 1. US Census and OFM Population Estimates Yakima County and Naches							
	2000 US Census Pop	OFM 2005 Pop Est.	2010 US Census Pop	OFM 2011 Pop Est.	OFM 2012 Pop Est.	OFM 2013 Pop Est.	OFM 2014 Pop Est.
Yakima County	222,581	231,902	243,231	244,700	246,000	247,250	248,800
Unincorporated	93,192	87,019	83,755	84,300	84,800	84,910	85,410
Incorporated Total	129,389	144,883	159,476	160,400	161,200	162,340	163,390
Naches	643	755	795	805	805	805	815

Source: US Census, Office Financial Management (OFM).

Table 2. Yakima County Preferred Alternative Twenty-year Population Projection Growth Rates (See Table 21 in Section II.)								
City	OFM Population Estimates 2010-2014 Annual Growth Rate (Step 2.)	Yakima County Adjusted Annual Growth Rate (Step 3.)	Adjusted Growth Rates Used Showing Decline					
			2015	2020	2025	2030	2035	2040
Naches	1.22%	1.22%	1.22%	1.17%	1.10%	1.04%	1.00%	0.94%

Source: Yakima County.

Table 3. Yakima County's Preferred Alternative Twenty-year Projected Population City of Naches (See Tables 22a-e)						
	2015	2016	2017	2018	2019	2020
Yakima County	256,341	258,730	261,462	264,150	266,780	269,347
Naches	830	840	850	860	870	881
	2021	2022	2023	2024	2025	2026
Yakima County	271,956	274,512	277,037	279,530	282,057	284,652
Naches	891	901	911	921	931	942
	2027	2028	2029	2030	2031	2032
Yakima County	287,148	289,615	292,046	294,445	297,036	299,485
Naches	952	962	972	982	992	1,002
	2033	2034	2035	2036	2037	2038
Yakima County	301,896	304,276	306,636	309,052	311,443	313,811
Naches	1,012	1,023	1,033	1,043	1,053	1,063
	2039	2040				
Yakima County	316,161	318,494				
Naches	1,074	1,084				

Source: Office Financial Management (OFM) and Yakima County.

Table 4. Yakima County Preferred Alternative Medium Population Projections for Yakima County, Naches and Unincorporated Areas (2040) (See Table 23)			
	OFM's 2014 Population Estimates	Yakima County Preferred Alternative Medium Population Projection Year 2040	Total Population Change 2014-2040
Yakima County	248,800	318,494	69,694
Unincorporated Total	85,410	117,983	32,573
Incorporated Total	163,390	200,511	37,121
Naches	815	1,084	269

Source: Office Financial Management (OFM) and Yakima County.

The Office of Financial Management (OFM) has Naches at an estimated population of 815 for 2014. Yakima County is projecting Naches' population at 1,084 in the year 2040. That is an increase of 269 individuals over the twenty-six year timespan. This allocation of 269 individuals will be used by Yakima County and the City of Naches as part of the upcoming Urban Growth Area analysis and for other comprehensive planning needs.

Table. 5 Yakima County Preferred Alternative 2040 Employment Projection and Allocation (Table 25 Section III.)				
	2012 Civilian Labor Force#	Yakima County Preferred Alternative 2040 Projected Population	Yakima County Preferred Alternative 2040 Employment Projection	Number of Additional Jobs Needed by 2040
Yakima County	110,603	318,494	143,322	32,719
Naches	410	979	552	142

Source: 2008-2012 American Community Survey US Census, Office of Financial Management and Yakima County.

The 2008-2012 American Community Survey US Census has Naches at an estimated civilian labor force of 410 for 2012. Yakima County is projecting Naches' civilian labor force at 552 in the year 2040. That is an increase of 142 jobs over the twenty-eight year timespan. This allocation of 142 jobs will be used by Yakima County and Naches as part of the upcoming Urban Growth Area analysis and for other comprehensive planning needs.

		Units	Naches Current 9-14-16	Naches Proposed 9-14-16
1 - Population and Households Analysis				
a	2040 population for City (County's preferred alternative medium projection)	people	1,084	1,084
b	2015 population in City (OFM's April 1 estimate)	people	830	830
c	City's projected population increase, 2015-2040 (a - b)	people	254	254
d	City's average household size (2010 Census)	people per household	2.51	2.51
e	Additional households projected for City, 2015-2040 (c ÷ d)	households	101	101
2 - Future Residential Land Need				
f	Desired average density of future housing, 2015-2040 (5.1 dwelling units per acre)	sq. ft. per dwelling unit	8,500	8,500
g	Land needed for future housing (e • f ÷ 43,560 sq. ft. per acre)	acres	20	20
3 - Future Commercial & Retail Land Need				
h	Current developed commercial & retail land in City (from GIS analysis)	acres	41	41
i	Current developed commercial & retail land in City per person (h ÷ b)	acres per person	0.0494	0.0494
j	Land needed for future commercial & retail (i • c)	acres	13	13
4 - Future Community Facilities* Land Need				
k	Current developed community facilities land in City (from GIS analysis)	acres	99	99
m	Current developed community facilities land in City per person (k ÷ b)	acres per person	0.1193	0.1193
n	Land needed for future community facilities (m • c)	acres	30	30
5 - Future Streets Land Need				
p	Subtotal of land needed for future residential, commercial & retail, and community facilities (g + j + n)	acres	63	63
q	Land needed for future streets (p • 15%)	acres	9	9
6 - Land Capacity Analysis				
<u>Residentially-zoned capacity</u>				
r	Current vacant residentially-zoned land in City (from GIS analysis)	acres	37	37
s	(minus) Land needed for future housing and associated streets (-g • 115%)	acres	(23)	(23)
t	= Surplus (Deficit) of vacant residentially-zoned land in City (r + s)	acres	14	14
u	Current vacant residentially-zoned land outside City (from GIS analysis)	acres	82	82
v	(plus) Surplus (Deficit) of vacant residentially-zoned land in City (t)	acres	14	14
w	= Surplus (Deficit) of vacant residentially-zoned land in UGA (u + v)	acres	96	96
<u>Commercially-zoned capacity</u>				
x	Current vacant commercially-zoned land in City (from GIS analysis)	acres	56	56
y	(minus) Land needed for future commercial & retail and associated streets (-j • 115%)	acres	(15)	(15)
z	= Surplus (Deficit) of vacant commercially-zoned land in City (x + y)	acres	41	41
aa	Current vacant commercially-zoned land outside City (from GIS analysis)	acres	22	22
bb	(plus) Surplus (Deficit) of vacant commercially-zoned land in City (z)	acres	41	41
cc	= Surplus (Deficit) of vacant commercially-zoned land in UGA (aa + bb)	acres	63	63
<u>Community Facilities capacity</u>				
dd	Current vacant community facilities land in City (from GIS analysis)	acres	19	19
ee	(minus) Land needed for future community facilities and associated streets (-n • 115%)	acres	(35)	(35)
ff	= Surplus (Deficit) of vacant community facilities in City (dd + ee)	acres	(16)	(16)
gg	Current vacant community facilities land outside City (from GIS analysis)	acres	4	4
hh	(plus) Surplus (Deficit) of vacant community facilities land in City (ff)	acres	(16)	(16)
ii	= Surplus (Deficit) of vacant community facilities land in UGA (gg + hh)	acres	(12)	(12)
<u>Capacity for growth in City (excluding Industrial growth)</u>				
jj	Surplus (Deficit) of vacant land for residential, commercial, community facilities, & streets (t + z + ff)	acres	39	39
kk	Computed Market Choice Factor in City (MCF)**	%	53%	53%
mm	Years of growth available in City ((kk + 1) • 25)	years	38	38
<u>Capacity for growth outside City (excluding Industrial growth)</u>				
nn	Years of growth available outside City (rr - mm)	years	37	37
<u>Capacity for growth in UGA (excluding Industrial growth)</u>				
pp	Surplus (Deficit) of vacant land for residential, commercial, community facilities, & streets (w + cc + ii)	acres	147	147
qq	Computed Market Choice Factor in UGA (MCF)***	%	201%	201%
rr	Years of growth available in UGA ((qq + 1) • 25)	years	75	75
7 - Future Industrial Land Need				
ss	Current developed industrially-zoned land in City (from GIS analysis)	acres	1	1
tt	Current developed industrially-zoned land outside City (from GIS analysis)	acres	26	95
uu	Current vacant industrially-zoned land in City (from GIS analysis)	acres	1	1
vv	Current vacant industrially-zoned land outside City (from GIS analysis)	acres	28	51
ww	Industrial acres to add to UGA (based on City's economic development strategy)	acres	0	91
xx	Industrial acres to remove from UGA (based on City's economic development strategy)	acres	0	0

*Community Facilities such as parks, schools, libraries, city halls, fire stations, churches

** $(\text{vacant acres in City} \div \text{needed acres}) - 1 = (r + x + dd) \div (-s - y - ee) - 1$

*** $(\text{vacant acres in UGA} \div \text{needed acres}) - 1 = (r + u + x + aa + dd + gg) \div (-s - y - ee) - 1$

Note: numbers in parentheses are negative

Naches Current UGA Analysis 2016



Naches Report - UGA Analysis

09/14/2016
12:41:57

Total Acres: 573.08

Total Acres Within City: 346.31
Total Acres Outside City Limits Within UGA: 226.77

Total of acres that are Developed: 248.31
Total of acres that are Vacant: 238.07
Total of acres that are Partially Vacant: 86.69
Vacant Acres: 61.69
Developed Acres: 25.00

Acreage by Zone Groupings

RESIDENTIAL

Total Residential: 208.88
Total Residential Within the City: 96.41
Total Residential Outside City Limits: 112.47

Total Vacant: 119.40
Total Vacant Within City Limits: 37.38
Total Vacant Outside City Limits: 82.02
Total Developed: 89.47
Total Developed Within the City Limits: 59.02
Total Developed Outside City Limits: 30.45

Commercial

Total Commercial: 119.86
Total Commercial Within the City: 96.89
Total Commercial Outside City Limits: 22.96

Total Vacant: 78.37
Total Vacant Within City Limits: 56.36
Total Vacant Outside City Limits: 22.01

Total Developed: 41.48
Total Developed Within the City Limits: 40.53
Total Developed Outside City Limits: 0.95

Industrial
Total Industrial: 56.88
Total Industrial Within the City: 2.30
Total Industrial Outside City Limits: 54.58

Total Vacant: 29.60
Total Vacant Within City Limits: 1.29
Total Vacant Outside City Limits: 28.30
Total Developed: 27.28
Total Developed Within the City Limits: 1.01
Total Developed Outside City Limits: 26.28

Community Facilities

Total Community Facilities: 126.99
Total Community Facilities Within the City: 118.25
Total Community Facilities Outside City Limits: 8.74

Total Vacant: 22.43
Total Vacant Within City Limits: 18.82
Total Vacant Outside City Limits: 3.61

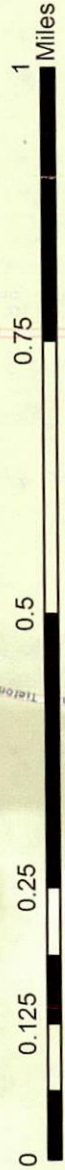
Total Developed: 104.56
Total Developed Within the City Limits: 99.43
Total Developed Outside City Limits: 5.13

Environmentally Constrained

Total Environmentally Constrained: 60.48
Total Environmentally Constrained Within the City: 32.47
Total Environmentally Constrained Outside City Limits: 28.01

Total Vacant: 49.97
Total Vacant Within City Limits: 28.22
Total Vacant Outside City Limits: 21.74

Total Developed: 10.51
Total Developed Within the City Limits: 4.24
Total Developed Outside City Limits: 6.27



Date: 9/29/2016

Naches Proposed UGA Analysis 2016

Naches Report - UGA Analysis

09/14/2016
12:38:44

Total Acres: 665.44

Total Acres Within City: 346.31

Total Acres Outside City Limits Within UGA: 319.12

Total of acres that are Developed: 317.85

Total of acres that are Partially Vacant: 86.69

Vacant Acres: 61.69

Developed Acres: 25.00

Acreeage by Zone Groupings

RESIDENTIAL

Total Residential: 209.88

Total Residential Within the City: 96.41

Total Residential Outside City Limits: 113.47

Total Vacant: 119.40

Total Vacant Within City Limits: 37.38

Total Vacant Outside City Limits: 82.02

Total Developed: 90.48

Total Developed Within the City Limits: 59.02

Total Developed Outside City Limits: 31.45

Commercial

Total Commercial: 119.86

Total Commercial Within the City: 96.89

Total Commercial Outside City Limits: 22.96

Total Vacant: 78.37

Total Vacant Within City Limits: 56.36

Total Vacant Outside City Limits: 22.01

Total Developed: 41.48

Total Developed Within the City Limits: 40.53

Total Developed Outside City Limits: 0.95

Industrial

Total Industrial: 148.23

Total Industrial Within the City: 2.30

Total Industrial Outside City Limits: 145.93

Total Vacant: 52.42

Total Vacant Within City Limits: 1.29

Total Vacant Outside City Limits: 51.12

Total Developed: 95.82

Total Developed Within the City Limits: 1.01

Total Developed Outside City Limits: 94.81

Community Facilities

Total Community Facilities: 126.99

Total Community Facilities Within the City: 118.25

Total Community Facilities Outside City Limits: 8.74

Total Vacant: 22.43

Total Vacant Within City Limits: 18.82

Total Vacant Outside City Limits: 3.61

Total Developed: 104.56

Total Developed Within the City Limits: 99.43

Total Developed Outside City Limits: 5.13

Environmentally Constrained

Total Environmentally Constrained: 60.48

Total Environmentally Constrained Within the City: 32.47

Total Environmentally Constrained Outside City Limits: 28.01

Total Vacant: 49.97

Total Vacant Within City Limits: 28.22

Total Vacant Outside City Limits: 21.74

Total Developed: 10.51

Total Developed Within the City Limits: 4.24

Total Developed Outside City Limits: 6.27

Current Urban Growth Boundary

Proposed Urban Growth Boundary

Naches City Limits

Vacant\Developed

Vacant

Partially Developed

Developed

Zone Groups

Residential

Commercial

Industrial

Community Facilities

Environmentally Constrained

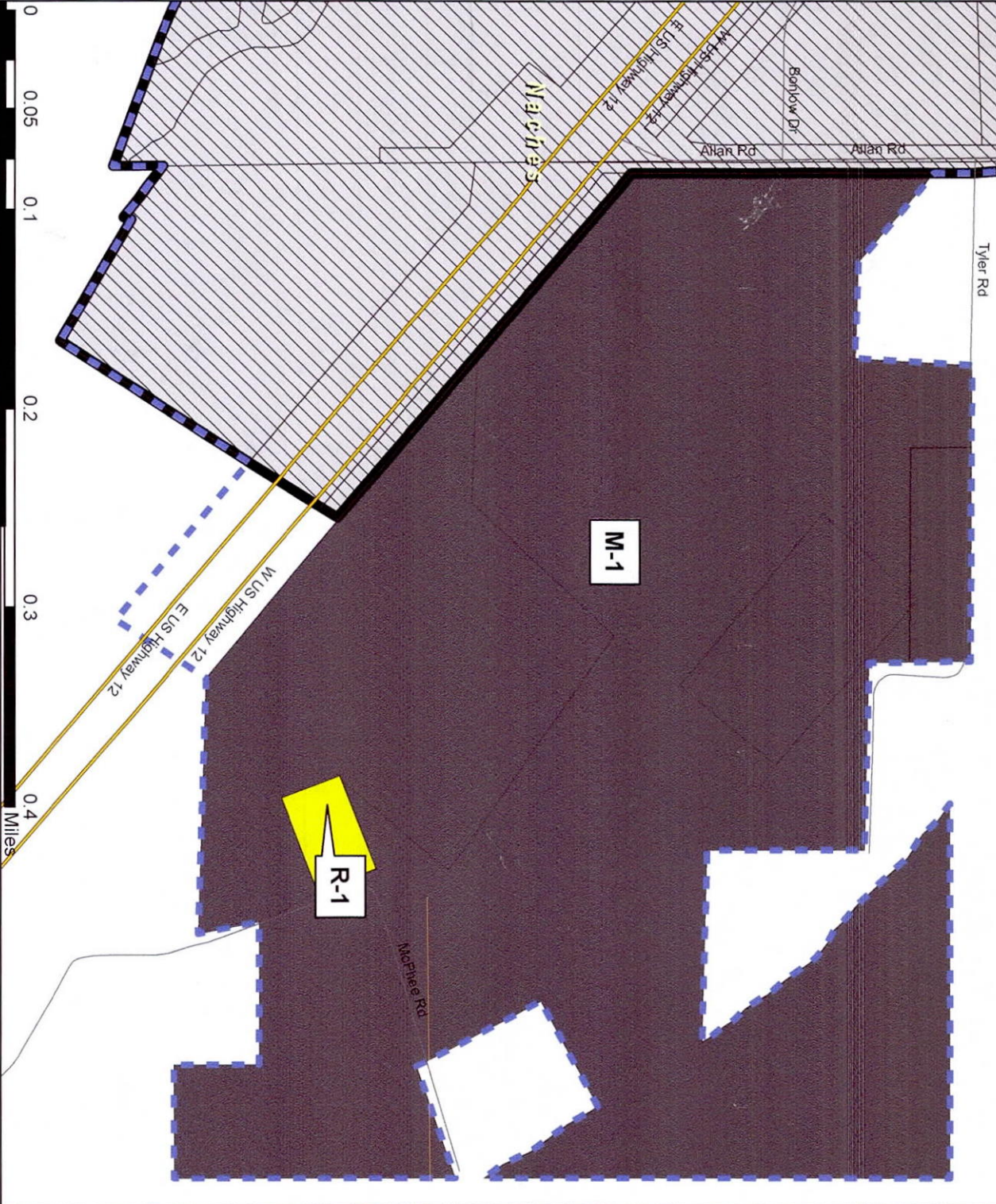
Attachment 5

Service Layer Credits Sources: Esri, DeLorme, NAVTEQ, USGS, Intermap, iPC, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, 2013

Document Path: R:\Risk_Spreading\county\planning\uga_analysis\naches\analysis 2015\NachesProposed Att5 092816.mxd

Date: 9/30/2016

Naches Recommended Urban Plan Designations and Zoning Map



Naches Recommended Changes



GEOGRAPHIC INFORMATION SERVICES

Naches UGA

- Naches City Limits
- Recommended Urban Growth Boundary
- Urban Growth Boundary

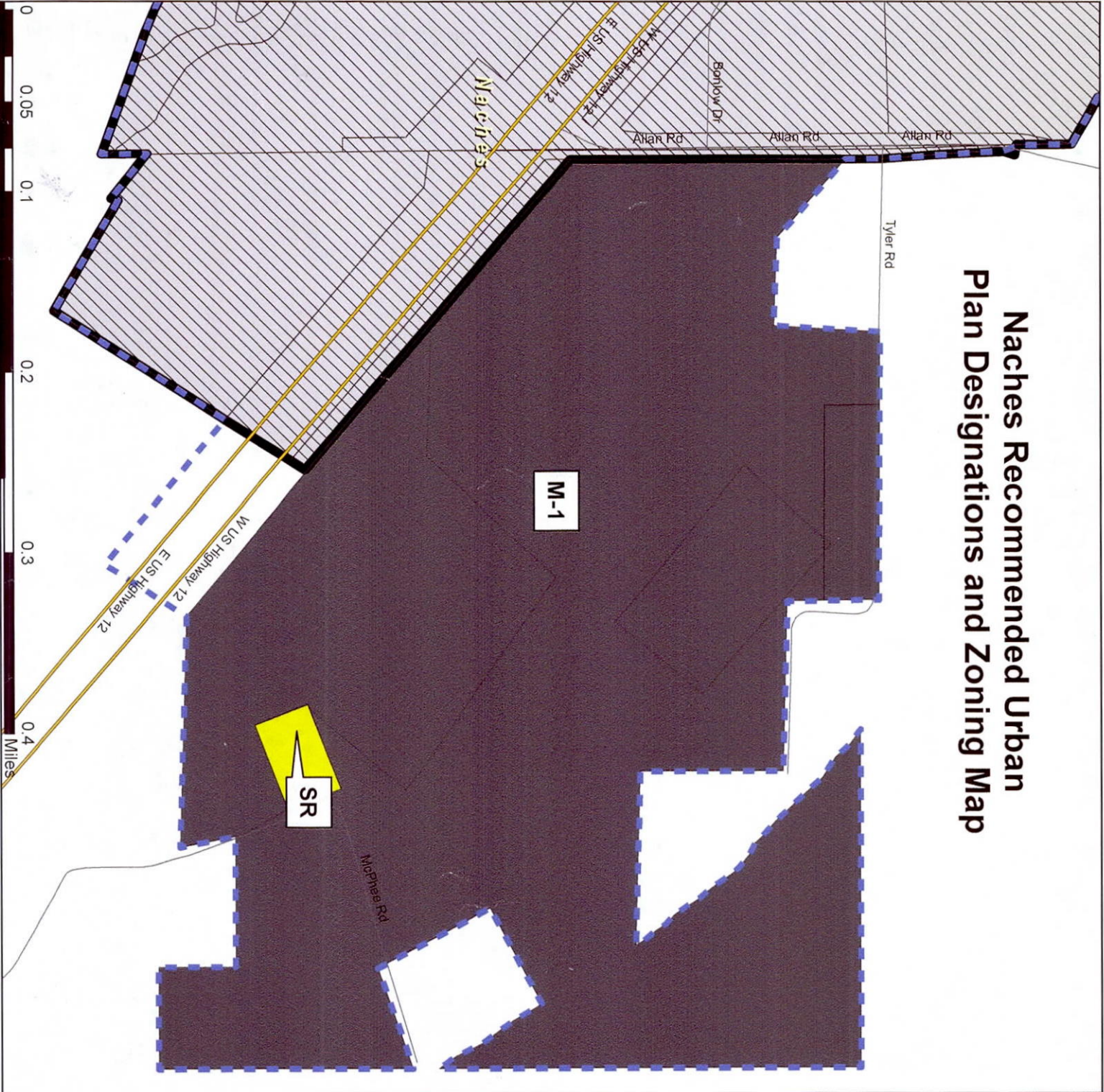
County Zoning

- R-1 - Single Family Residential
- M-1 - Light Industrial

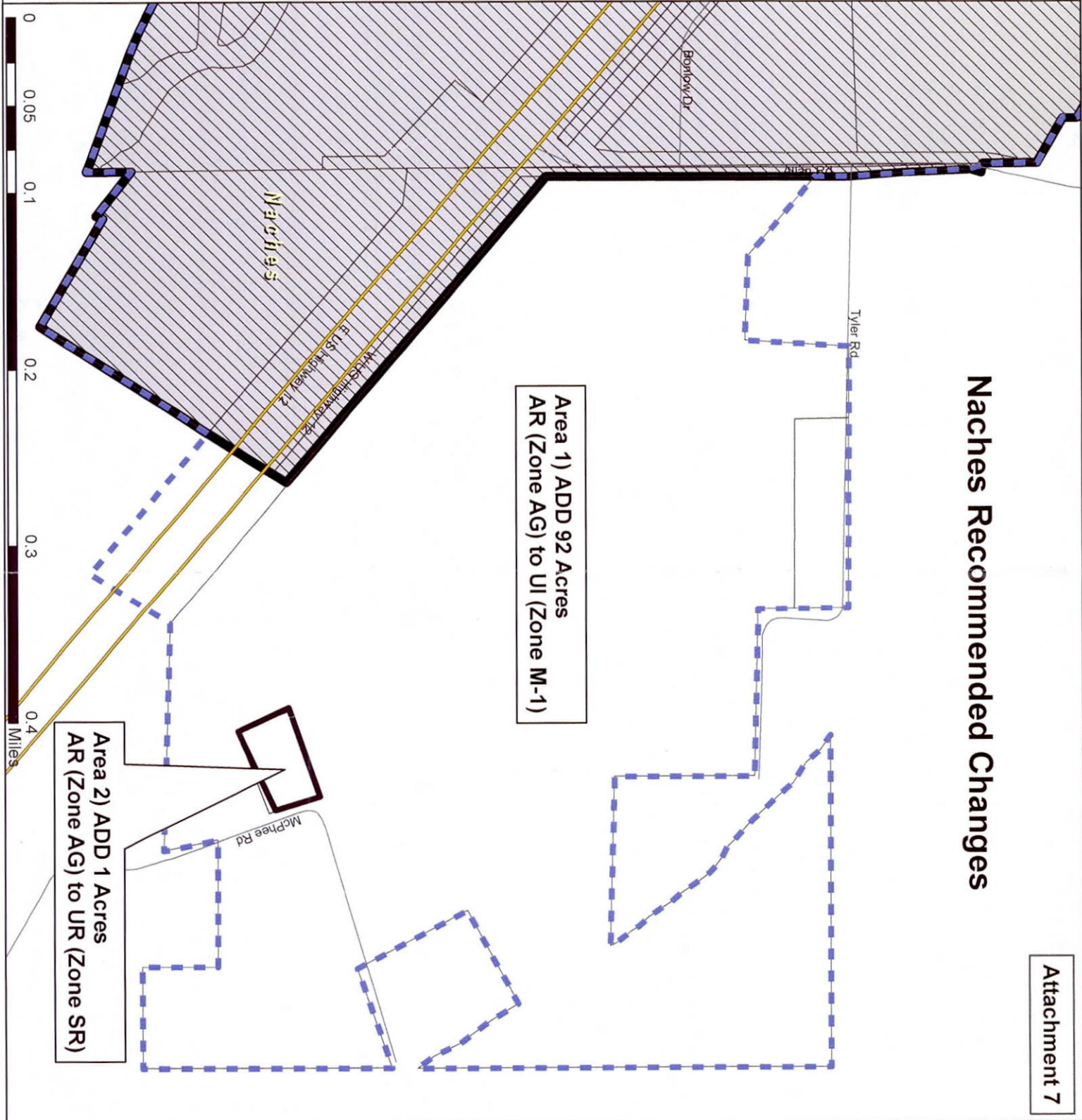
County Comprehensive Plan Designations

- Urban Industrial
- Urban Residential

Naches Recommended Urban Plan Designations and Zoning Map






Naches Recommended Changes



GEOGRAPHIC INFORMATION SERVICES

Planning Commission Recommended Changes to UGA Proposal

Note: The changes are to the UGA boundary, to comp plan designations, and to zoning.

-  Naches City Limits
-  Recommended Urban Growth Boundary
-  Urban Growth Boundary

- County Zoning**
- R-1 - Single Family Residential
- M-1 - Light Industrial
- County Comprehensive Plan Designations**
-  Urban Industrial
-  Urban Residential

Agricultural Resource De-designation Analytical Process – Naches Propose UGA Expansion (Allan Brothers)

The Agricultural Resource De-designation Analytical Process is found in the Land Use subchapter of **Plan 2015**, Volume 1, Chapter I, immediately following the mapping criteria for Agricultural Resource Areas. Adopted in 2003, Mapping Criterion #7 states the purpose of the De-designation Analytical Process as follows:

The agricultural resource de-designation criteria will be used for plan amendments and updates to change a land use from Agricultural Resource to another land use designation.

The analytical process considers 10 variables listed in WAC 190-365-050 that could adversely impact commercial agriculture. These variables are considered in light of the GMA's goal to protect AG land of long term commercial significance. When the answer to whether or not a variable has an adverse effect on commercial agriculture is "yes," the number of "yes" answers must reach a total of eight before the determination can be made that the impacts are overwhelming and significant to the point where the property can no longer be considered AG land of long term commercial significance.

The 10 factors in **Plan 2015** are quoted below *in italics*, followed by the staff's analysis of impacts to the subject site.

Quantitative Analytical Process

1. Soils

Soils considered to be an Agricultural Resource of Long Term Commercial Significance are primarily those soils listed as 'Prime' in the Soil Survey of Yakima County dated May 1985. This list of soils, however, does not include similar soils as those listed as Prime that are located on slopes with a gradient higher than 2 degrees. Slopes with a gradient up to and including 15 degrees are considered suitable for growing tree fruit and grapes based on good drainage and the ability for cold air to fall down gradient. The limiting factor for slopes is one of safety when operating machinery. Slopes above 15 degrees may not be suitable to the safe operation of equipment needed for commercial agriculture. As a result of these considerations, these additional soils on slopes are included based on their listing as suitable for the various crops grown in Yakima County. All selected soils are then rated by their anticipated crop yield into five equal breaks, based on the crop the soil is most suited for. For soils suitable for tree fruit, for example, these breaks are as follows:

<i>1000 to 867 bu/ac crop yield</i>	<i>4 points (Highest)</i>
<i>866 to 733 bu/ac crop yield</i>	<i>3 points (Above Average)</i>
<i>732 to 599 bu/ac crop yield</i>	<i>2 points (Average)</i>
<i>598 to 465 bu/ac crop yield</i>	<i>1 point (Below Average)</i>
<i>464 to 330 bu/ac crop yield</i>	<i>0 points (Lowest)</i>

Other crop types that have suitable soils within the Yakima County Soil Survey, such as various row crops and hay/alfalfa, are also rated by anticipated crop yield into five equal breaks and assigned the appropriate number of points.

Staff analysis: The subject site, as described by the Soil Survey of Yakima County, has 5 different soil classifications:

- 2 - Ashue loam - Irrigated apples 735 bu/acre = 4 points (Highest)
- 18 - Cleman very fine sandy loam, 0 to 2 percent slopes - Irrigated apples 1000 bu/acre = 4 points (Highest)
- 19 - Cleman very fine sandy loam, 5 to 8 percent slopes - Irrigated apples 1000 bu/acre = 4 points (Highest)
- 182 - Weirman fine sandy loam - Winter wheat 100 bu/acre = 0 points (Lowest)
- 183 - Weirman gravelly fine sandy loam - Winter wheat 75 bu/acre = 0 points (Lowest)

As shown in the Map below, a majority of the site's acreage has soils that are considered Prime Farm Soils. The Ashue and Cleman soil types each scored 4 points representing the highest value. Under the Ag de-designation criteria, an impact in favor of de-designation results from below average scores. A majority of the site's acreage is Prime Soils and scored the highest, therefore:

Variable	Review Criteria	Impact to Ag - Yes or No
1. Soil	Below Average crop yield per USDA's Soil Survey	No



2. Proximity to the Urban Growth Area

Parcels are evaluated by their distance from an Urban Growth Area (UGA). The further away from the Urban Growth Area the less influence it has on a parcel to develop at some higher use. Thus, a higher numerical value for agriculture is assigned to parcels further away as follows:

Within ¼ mile of the UGA	0 points (Lowest)
Between ¼ and ½ mile	1 point (Below Average)
Between ½ mile and 1 mile	2 points (Average)
Between 1 mile and 2 miles	3 points (Above Average)
Greater than 2 miles from UGA	4 points (Highest)

Staff analysis: The subject property is located adjacent to the Naches UGA and town limits (0 Points (lowest)). Under the Ag de-designation criteria, an impact in favor of de-designation results from below average scores (i.e., 1 point and less). Therefore, the "Impact to Ag" for this site is "Yes."

Variable	Review Criteria	Impact to Ag - Yes or No
2. Proximity to Urban Growth Area	Less than ½ mile	Yes

3. Predominant Parcel Size

Larger parcels are thought to be more suitable for commercial agriculture. Smaller parcels have a greater pressure to develop as a residential lot or some other higher use. Parcels under contiguous ownership, while certainly having an effect on the probability for commercial agriculture, ought not be considered during the five-year update process due to the inherent fluidity of property ownership. Contiguous ownership, however, should be a consideration when evaluating property for possible removal from a resource area during the amendment review process. Parcels were assigned a numeric value, with higher values for agriculture given to larger parcels as follows:

Less than 5 acres	0 points (Lowest)
Between 5 and 10 acres	1 point (Below Average)
Between 10 and 20 acres	2 points (Average)
Between 20 and 40 acres	3 points (Above Average)
Greater than 40 acres	4 points (Highest)

Staff analysis: There are three subject parcels all east of Allan Road. The large Ag parcel is roughly 90 acres in size, the smaller Ag parcel is roughly 1 acre in size and lastly the residential lot located in the middle of the large parcel is roughly 1 acre in size. Under the Ag de-designation criteria, an impact in favor of de-designation results from below average scores (i.e., 1 point and less). Therefore, the "Impact to Ag" for this site is "No."

Variable	Review Criteria	Impact to Ag - Yes or No
3. Predominant Parcel Size	Smaller than 10 acres	No

Qualitative Analytical Process

Once the field evaluation has been conducted the remaining criteria to be considered under WAC 365-190-050 are considered individually.

4. Availability of Public Facilities

Of the list of various public facilities provided by the County and Cities, roads, sewer and water are the three whose presence could possibly add pressure to develop at a higher use. These facilities can be mapped and a study area evaluated for its proximity to them and a determination as to the effect they would have regarding pressure to develop. If facilities are within a reasonable distance to the majority of the parcels within the study area (1000'), then they are determined to have an effect. Water and sewer are normally confined to the city and its urban growth area. The only exception to this is in close proximity to the City of Yakima where sewer and water services may extend out into some rural and agricultural areas.

Staff analysis: The subject property is not serviced by public water or sewer service, however if the UGA expansion is approved the Town of Naches has obtained the necessary funding to extend sewer to the site. Timelines on when the property would be annexed by the Town of Naches if approved is unknown. This availability of public facilities indicates "Yes" impact to Ag.

Variable	Review Criteria	Impact to Ag - Yes or No
4. Availability of Public Facilities	Within 1000' of water, sewer or paved road	Yes

5. Tax Status

Tax Status indicates the current land use and tax rate being claimed by the property owner and reported by the Assessor. An inference can be made by looking at the current tax status as to the property owners' intent for the land. This intent alone cannot be considered when determining the appropriateness of the land for designation as Agricultural Land of Long-term Commercial Significance, but may be another indicator of the possibility of a more intense use of the land. When the majority of the parcels within the study area have a tax status other than Agriculture, then it is considered one factor for possible removal of the area from resource designation.

Staff analysis: The entire subject property is assessed as Manufacturing for Food. This indicates "Yes" impact to agriculture.

Variable	Review Criteria	Impact to Ag - Yes or No
5. Tax Status	Predominance of a tax status other than ag	Yes

6. Availability of Public Services

Public services include police, fire, and library services to the name the obvious. Police and Fire are the primary services considered for the purposes of this analysis. The County has established Level of Service standards for both the police and fire departments. These levels are calculated according to the number of calls for service, which in turn dictates the average response time throughout their service areas. New development accounts for additional calls for service at a predetermined rate per dwelling unit. Absent of any specific amplifying data to the contrary, any new development must be assumed to decrease the applicable levels of service. This decrease would then dictate that the public services are not available for any new development and therefore cannot be said to represent pressure for the area to develop and thus impact agriculture.

Staff analysis: The subject property is located adjacent to the Town of Naches and is considered a major employer to the Town. The property's proximity to the Town and its services including Fire District #3 and Naches Valley School District, presents "Yes" impacts to agriculture.

Variable	Review Criteria	Impact to Ag - Yes or No
6. Availability of Public Services	Presents an adverse impact to ag	Yes

7. & 8. Land Use Settlement Patterns and Their Compatibility with Agricultural Practices and Intensity of Nearby Uses

Land Use Settlement Patterns and the Intensity of Nearby Uses provide similar information as Proximity to Urbanized Areas in that they show residential or other development that may represent prohibitive impacts to commercial agriculture. However, there are development areas outside of the urban growth areas that require consideration for their potential impact to agriculture. In those areas, Land use settlement patterns and their compatibility with commercial agriculture deals with those uses adjacent to a study area that may represent a level of incompatibility and impact the ability to conduct agriculture. If this pattern is of such a significant amount, it may represent a factor. Intensity of nearby land uses in those areas explains the adjacent land use patterns that, due to their size, density and proximity, cause an overwhelming pressure for the study area to develop at some higher use above commercial agriculture. In these cases, that intensity may also be counted as a factor.

Staff analysis: There are 49 parcels immediately surrounding the subject property. The statistics for the sizes of those parcels are:

- 328 acres – total of 49 parcels
- 48.87 acres – largest parcel
- 6.70 acres – mean size of 49 parcels
- 0.9 acre – smallest parcel

The statistics above indicate a variety of lot sizes adjacent to the subject property and a lack of a specific settlement pattern and the intensity of use that would adversely impact

agricultural practices on the subject property. This would typically indicate a "No" impact to agriculture because of the lack of a clear distinction either way. However, the fact that the subject property is located directly adjacent to both the UGA boundary and the Naches' city limits would indicate that both the land use settlement patterns and intensity of land uses will increase and ultimately generate a "yes" impact to agriculture. The "yes" response also fits considering that the subject property itself is a developed industrial land use with County approvals to expand.

Variable	Review Criteria	Impact to Ag - Yes or No
7. Land Use Settlement Patterns	Impact on ag	Yes

Variable	Review Criteria	Impact to Ag - Yes or No
8. Intensity of Nearby Land Uses	Impact on ag	Yes

9. History of Land Development Permits Issued Nearby

The History of Development Permits Issued Nearby may also serve as evidence of pressure to develop at some higher use. A history of permitting activity is a way of looking at nearby permitting patterns, which may give an indication of things to come for the study area. Regardless, nearby permitting history requires individual scrutiny to determine if there may have been a significant surge in permitting, absent sufficient time for a significant development pattern to form. If there is a record of 15 or more subdivision permits within a half-mile radius, within the County's permit history database, it can be assumed that it is a sufficient number to be considered a factor.

Staff analysis: The Planning History coverage in GIS indicates that 4 plats or short plats have been approved since 1990 on parcels within one-half mile of the subject site. This indicates "no" impact to agriculture.

Variable	Review Criteria	Impact to Ag - Yes or No
9. History of Land Development	15 or more subdivisions within ½ mile	no

10. Land Values Under Alternative Uses

Agricultural lands are generally valued at a rate significantly lower than other uses. If land values within the study area are being assessed at a higher rate than that normally associated with agriculture, then this higher rate can be considered a factor. The prevailing agricultural rate is determined by similar properties outside of the study area that are known to be actively involved in agriculture.

Staff analysis: Of the 49 parcels adjacent to the subject site only 7 are in the current use agriculture tax program, which equates to roughly 86% of the neighboring property are being tax assessed at a higher rate. Therefore, the overwhelming majority of adjacent land values are generally being assessed at a higher rate than associated with agriculture, which indicates "Yes" impact to agriculture.

Variable	Review Criteria	Impact to Ag - Yes or No
10. Land Values under Alternative Uses	Assessed value indicates non-ag use	Yes

Final Assessment

A final assessment of a particular area's relative value as Agricultural Land of Long Term Commercial Significance is based on a combined quantitative and qualitative analysis considering all allowable variables. The question must be answered, "Is there sufficient pressure due to nearby parcelization and the possibility of a more intense use of the land to affect a study area or parcel to the point that commercial agriculture is no longer practical?"

Those factors that can be evaluated through the quantitative process will provide a preliminary indication as to the possible current value of the land as an agricultural resource. It will also provide evidence of those specific areas within a general study area that require closer evaluation. However, a physical site evaluation as well as consideration of the remaining variables must be completed before any final assessment can be made.

Each area may offer unique circumstances that may be considered in the evaluation process and that cannot be evaluated quantitatively. As an example, proximity to an Urban Growth Area may appear to have provided pressure for an area to be removed from Agricultural Resource designation. However, a closer review may indicate that properties within the Urban Growth Area, and adjacent to the area being studied, have not begun to develop and thus represent no pressure for the study area to develop at some higher use.

Unique physical characteristics of a particular area may also provide additional evidence for possible removal from Agricultural Resource designation. This evidence may include information concerning topographical limitations, the physical availability of irrigation water (not water rights), or any other characteristic associated with the land that was not included in the basic analytical process. It may not be practical for this evidence to be considered in the broader context of an area wide update, but may be relevant when evaluating smaller areas during a Map Amendment process.

During the basic analytical process, when the answer to whether or not a variable has an effect on commercial agriculture is "yes," the number of "yes" answers must reach a total of eight before the determination can be made that the impacts are overwhelming and significant to the point where the property can no longer be considered agricultural land of long term commercial significance. {Amended 3/18/03}

At least eight impacts to agriculture are needed to determine that a site should be removed from AG land of long term commercial significance.

Variable	Review Criteria	Impact to Ag - Yes or No
1. Soil	Below Average crop yield per USDA's Soil Survey	No
2. Proximity to Urban Growth Area	Less than ½ mile	Yes
3. Predominant Parcel Size	Smaller than 10 acres	No
4. Availability of Public Facilities	Within 1000' of water, sewer or paved road	Yes
5. Tax Status	Predominance of a tax status other than ag	Yes
6. Availability of Public Services	Presents an adverse impact to ag	Yes
7. Land Use Settlement Patterns	Compatibility of land uses with ag	Yes
8. Intensity of Nearby Land Uses	Impact on ag	Yes
9. History of Land Development	15 or more subdivisions within ½ mile	No
10. Land Values under Alternative Uses	Assessed value indicates non-ag use	Yes
	Total	7

Change in Circumstances

The tremendous growth in technology and productive capacity of Yakima counties tree fruit industry has also demanded the increase for packing and storage facilities in as close proximity as possible to the orchard growing areas.

Further, existing Allan Brothers facilities in Naches currently supports the supply of fresh packable fruit, but does require expansion (on their existing property) to provide the capacity for the tree fruit industry growth that is occurring and is that growth is forecast to continue to increase.

The growth of Allen Brothers packing and storage facility requires increased supply for water and sewer and is currently available from the city of Naches, but only as industrial zoned property (per the city's comprehensive plan).

The change of circumstances of the tree fruit industries growth is requiring the increased capacity of its supporting cast of packing and storage facilities, water, sewer and transportation infrastructure.

Final Determination

The Ag de-designation criteria outlined above was developed to ensure that lands primarily devoted to or important for the long-term commercial production of agriculture would not be converted to rural or non-resource uses without the proper consideration of the goals and requirements of the GMA. GMA requires counties to protect and designate agricultural lands and at the same also requires counties to designate UGA. These two requirements can compete with each other if a city needs to add to its current UGA boundary and the only option is land designated for agriculture, which is exactly what the case is here with the Naches' proposal.

In 2002, Yakima County developed the Ag de-designation criteria to protect against the inappropriate conversion of designated agricultural land to rural or other non-resource land uses. The criteria was designed to protect agricultural lands that are producing high-value crops (orchard, vineyards, hops, specialty crops, dairies, lands with prime soils and irrigation, etc.). This meant that an agricultural parcel located adjacent to an existing UGA boundary would be treated the same as a parcel located far from a UGA boundary. However, the agricultural operation adjacent to the UGA has different levels of development pressure than the one located ten miles out. The de-designation criteria does provide measures to consider the location of agricultural parcel in relation to an UGA, but that measure is just one of ten different criterion to consider and each have the same weight. The design of the de-designation's analytical process heavily favors agricultural land and limits the chances of de-designating agricultural land for UGA expansions.

Over the last dozen or so years Yakima County made UGA boundary changes by recognized the conflict of the agricultural de-designation criteria, because its overall design created a conflict between two competing GMA goals (protection of agricultural land and the designation of UGAs). To make matters worse there are thousands of acres of designated agricultural land directly adjacent to existing UGA boundary throughout the County. This places a significant burden on a city's ability to grow if the only land they can expand their UGA boundary would ultimately fail the agricultural de-designation criteria. Therefore, the County choose to de-designate for UGA expansion purposes, because the UGA requirements found in both GMA and **Plan 2015** required the County to expand UGA's if the UGA requirements were met. GMA lacks the necessary guidance on what a County should do if there is a conflict between two competing GMA goals.

As part of the 2017 GMA update, Yakima County will propose changes to the agricultural de-designation criteria to allow prospective agricultural properties to be de-designated if a city's proposed UGA expansion meets both the GMA and **Plan 2015's** UGA expansion criteria. The Naches proposal is a little different, but shares similar aspects as discussed above. The proposed expansion area is zoned Agricultural and is adjacent to the existing UGA boundary, however the difference is the expansion area is already developed with an industrial agricultural use that is in need of public services to expand its operation. This is not a 90 acre hopfield or orchard being removed from production to put in the UGA for residential uses. Adding this property to the UGA allows the property owner to expand its agricultural operation under the County's industrial zoning, which ultimately may prove to be the most appropriate zoning anyway since this is an industrial use.

Yakima County Planning Staff is recommending de-designation recognizing the GMA conflict. This recommendation is based on the rationale listed above. The Planning Commission will need to make their recommendation on this issue at their deliberations on November 2, 2016.

The revised de-designation criteria will be presented to the Planning Commission as part of their review of the updated land use element later in 2016 or early 2017.

