

**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**

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**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.

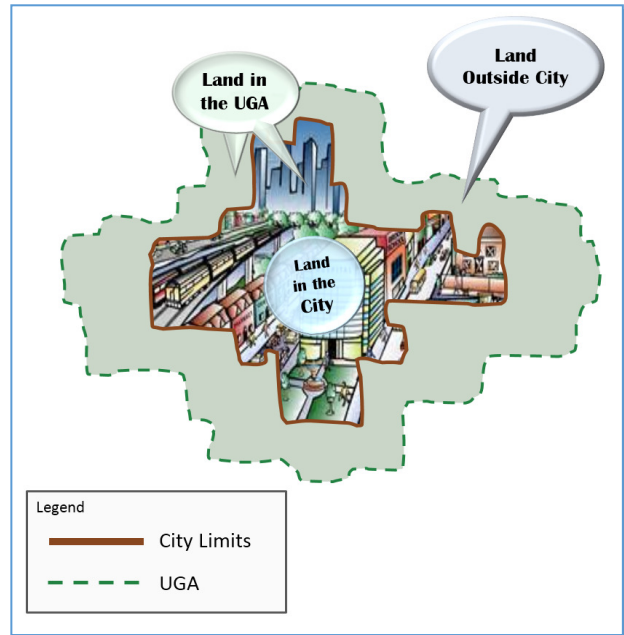
After reviewing OFM’s most recent population projections for Yakima County, the Yakima County Planning Division issued a draft report on January 16, 2015 that allocated the projected population and employment growth among the county’s 14 cities. In sharing the report with the county’s cities and the 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:

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

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 vacant<sup>3</sup> 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.

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

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

<sup>3</sup> 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.

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

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
<b>Total streets acreage needed (Subtotal x 0.15)</b>	<b>10 Acres</b>

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 <sup>4</sup>	23 Acres
+Acres needed for future commercial & retail uses <sup>4</sup>	15 Acres
+Acres needed for future community facilities <sup>4</sup>	35 Acres
<b>=Total vacant acres needed for future non-industrial uses<sup>4</sup></b>	<b>73 Acres</b>

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:

<b>Table 1: Land Capacity Analyses (LCA) Summary – Excluding Industrially-zoned Land</b>				
Zoning Group	Acreage Within City Limits	Surplus/Deficit Within City Limits <sup>4</sup>	Outside City Limits & Within <b>Current</b> UGA	<i>Total: Within City Limits and Within <b>Current</b> UGA<sup>4</sup></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:

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

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

<sup>4</sup> 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.

<b>Table 3: Naches’ Computed MCF and Years of Growth Available - Excluding Industrially-zoned lands</b>			
	Within the city	Outside the city and within the Current UGA	Within the <b>Current</b> 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:

<b>Town of Naches Zoning</b> (17.04 Naches Development Regulations)		
<b><i>Zoning District</i></b>	<b><i>Minimum Lot Size</i></b>	<b><i>Density</i></b>
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
<b>Yakima County UGA in the Urban Growth Area</b> (YCC Title 19)		
<b><i>Zoning District</i></b>	<b><i>Minimum Lot Size</i></b>	<b><i>Density</i></b>
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 I, 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	2,022	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.

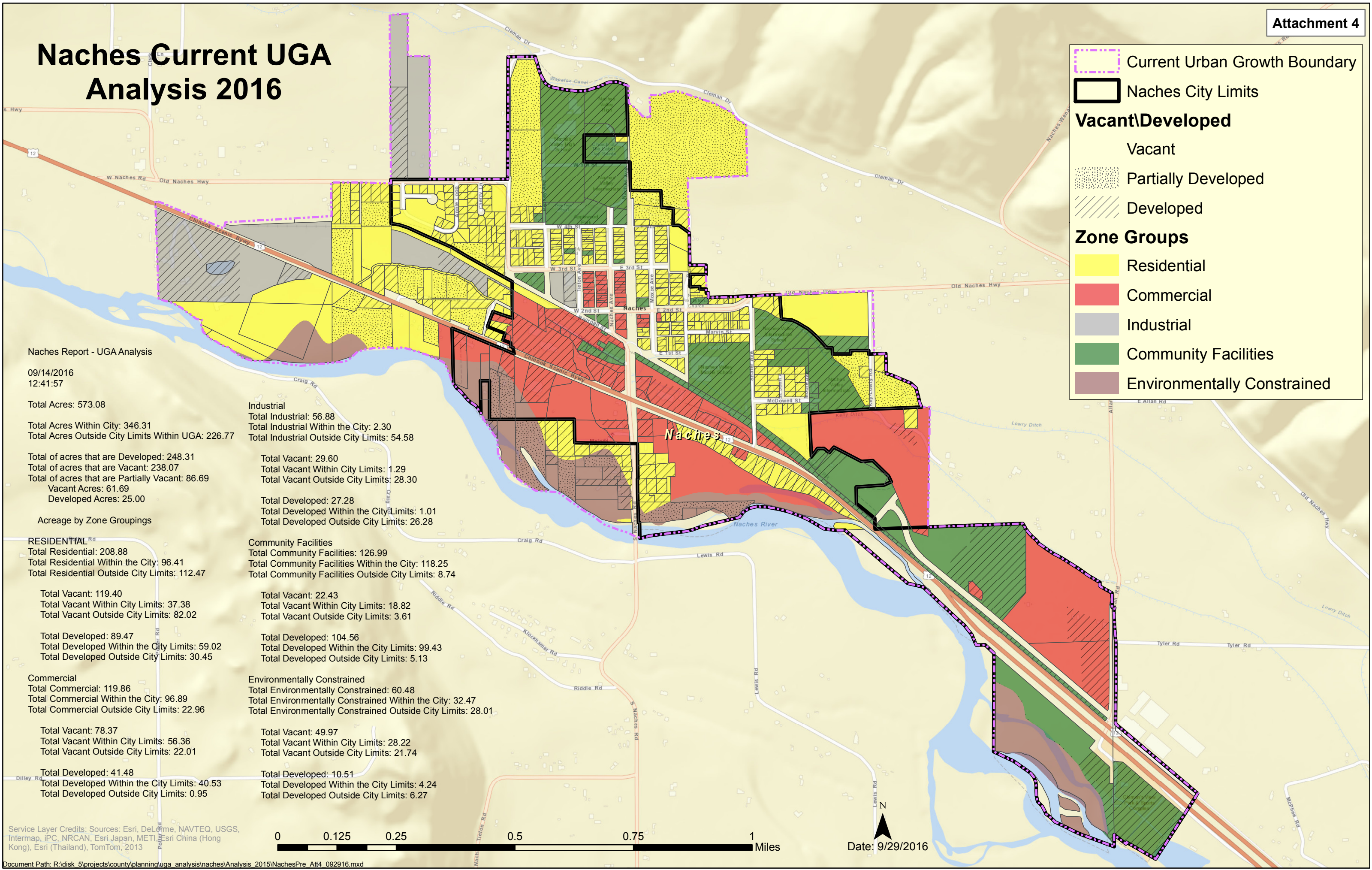


		Units	Naches Current 9-14-16	Naches Proposed 9-14-16
1 - Population and Households Analysis				
a	2040 population for City (County's preferred alternative medium projection)	people	1,084	1,084
b	2015 population in City (OFM's April 1 estimate)	people	830	830
c	City's projected population increase, 2015-2040 (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				
Residentially-zoned capacity				
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
Commercially-zoned capacity				
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
Community Facilities capacity				
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)
Capacity for growth in City (excluding Industrial growth)				
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
Capacity for growth outside City (excluding Industrial growth)				
nn	Years of growth available outside City (rr - mm)	years	37	37
Capacity for growth in UGA (excluding Industrial growth)				
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  
\*\*(vacant acres in City ÷ needed acres) - 1 = (r + x + dd) ÷ (-s - y - ee) - 1  
\*\*\*(vacant acres in UGA ÷ needed acres) - 1 = (r + u + x + aa + dd + gg) ÷ (-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

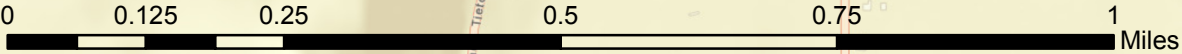
Total Vacant: 22.43  
Total Vacant Within City Limits: 18.82  
Total Vacant Outside City Limits: 3.61

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

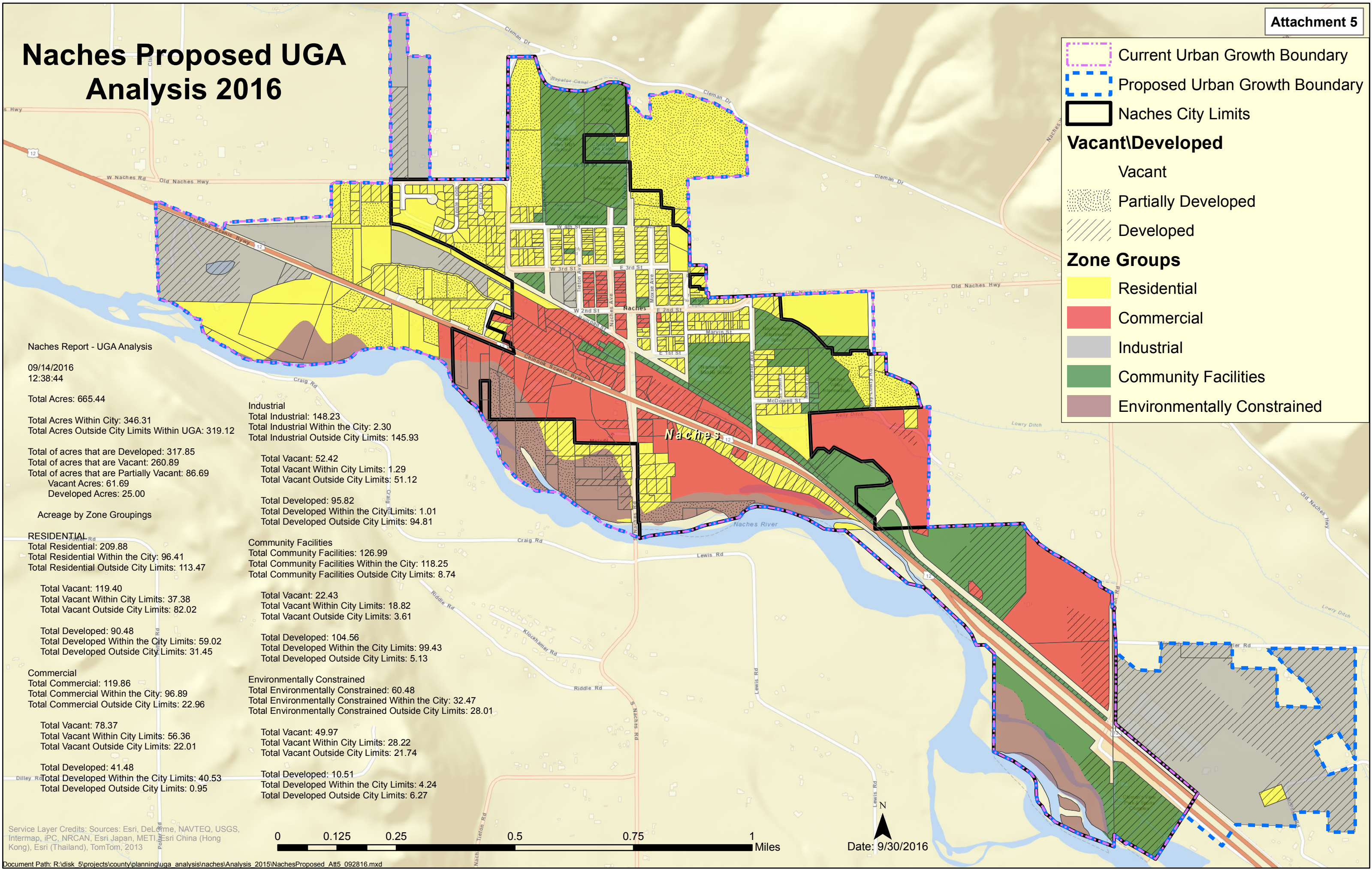
Total Vacant: 49.97  
Total Vacant Within City Limits: 28.22  
Total Vacant Outside City Limits: 21.74

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





# Naches Proposed UGA Analysis 2016



Current Urban Growth Boundary

Proposed Urban Growth Boundary

Naches City Limits

Vacant

Partially Developed

Developed

Residential

Commercial

Industrial

Community Facilities

Environmentally Constrained

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 Vacant: 260.89  
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

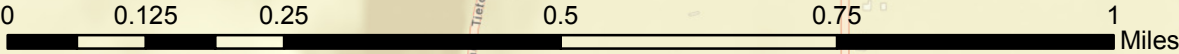
Total Vacant: 22.43  
Total Vacant Within City Limits: 18.82  
Total Vacant Outside City Limits: 3.61

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

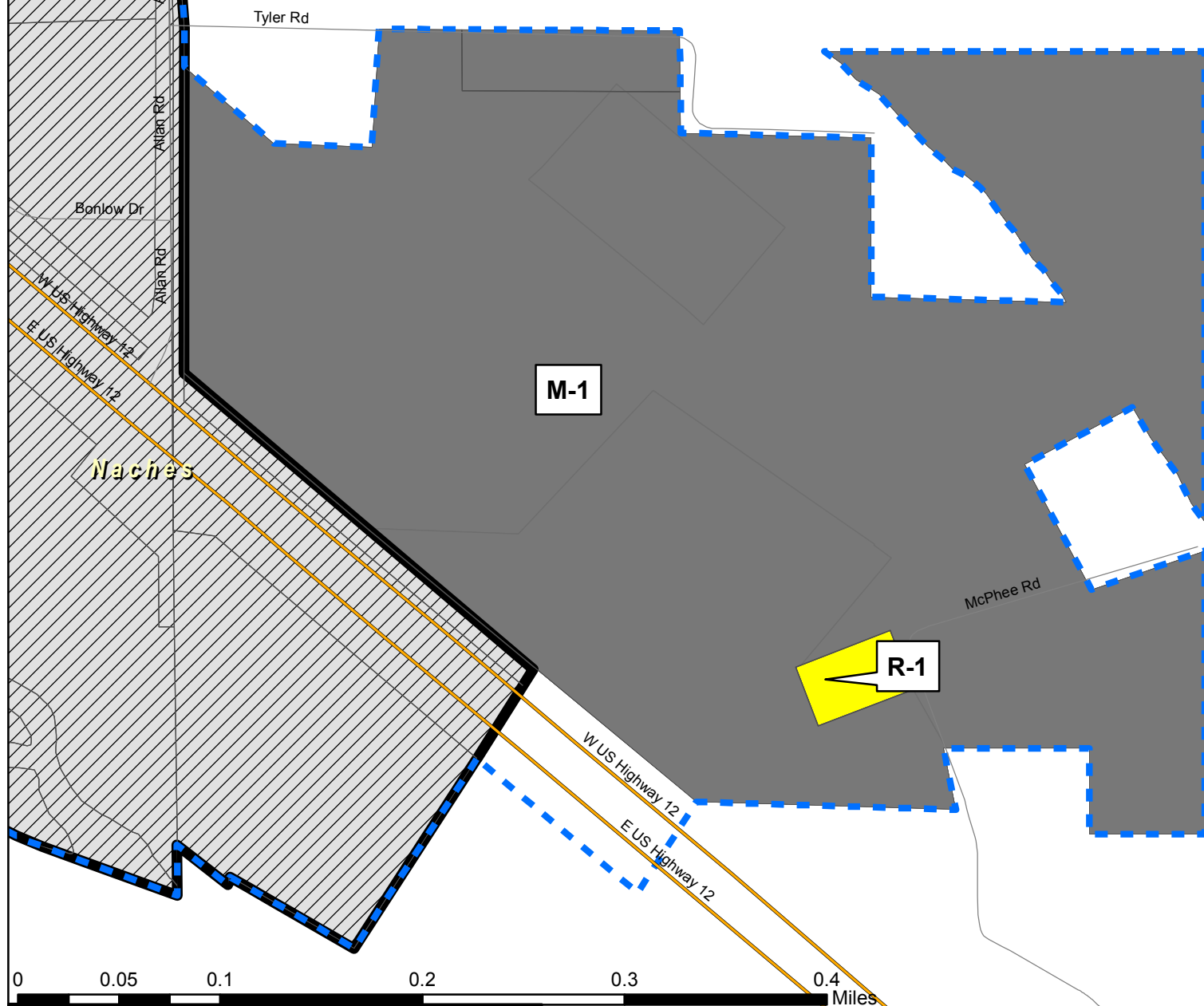
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Total Vacant Within City Limits: 28.22  
Total Vacant Outside City Limits: 21.74

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








## Naches Recommended Urban Plan Designations and Zoning Map



## GEOGRAPHIC INFORMATION SERVICES

# Naches UGA



**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

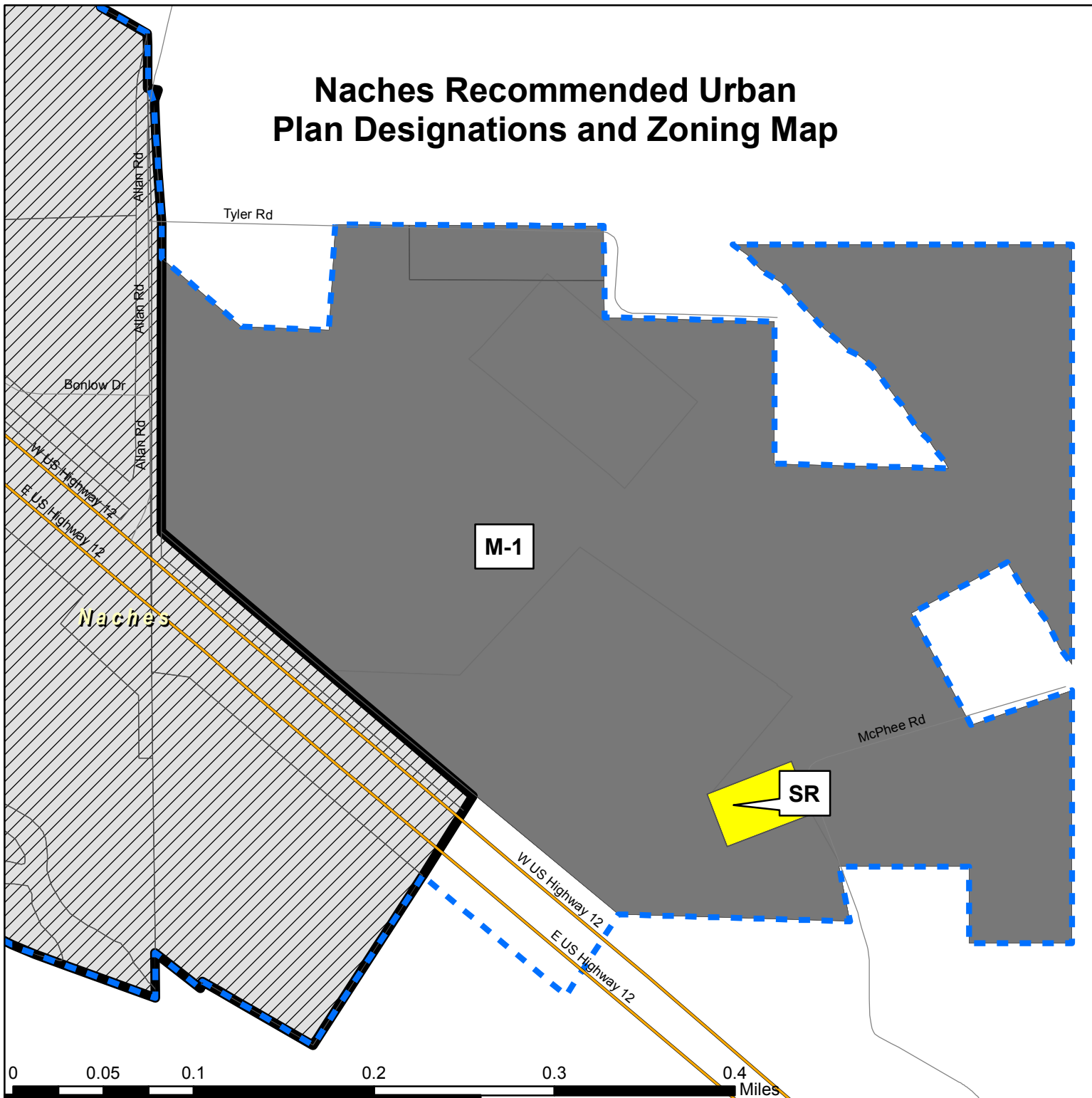


[Yakimap.com](http://Yakimap.com)

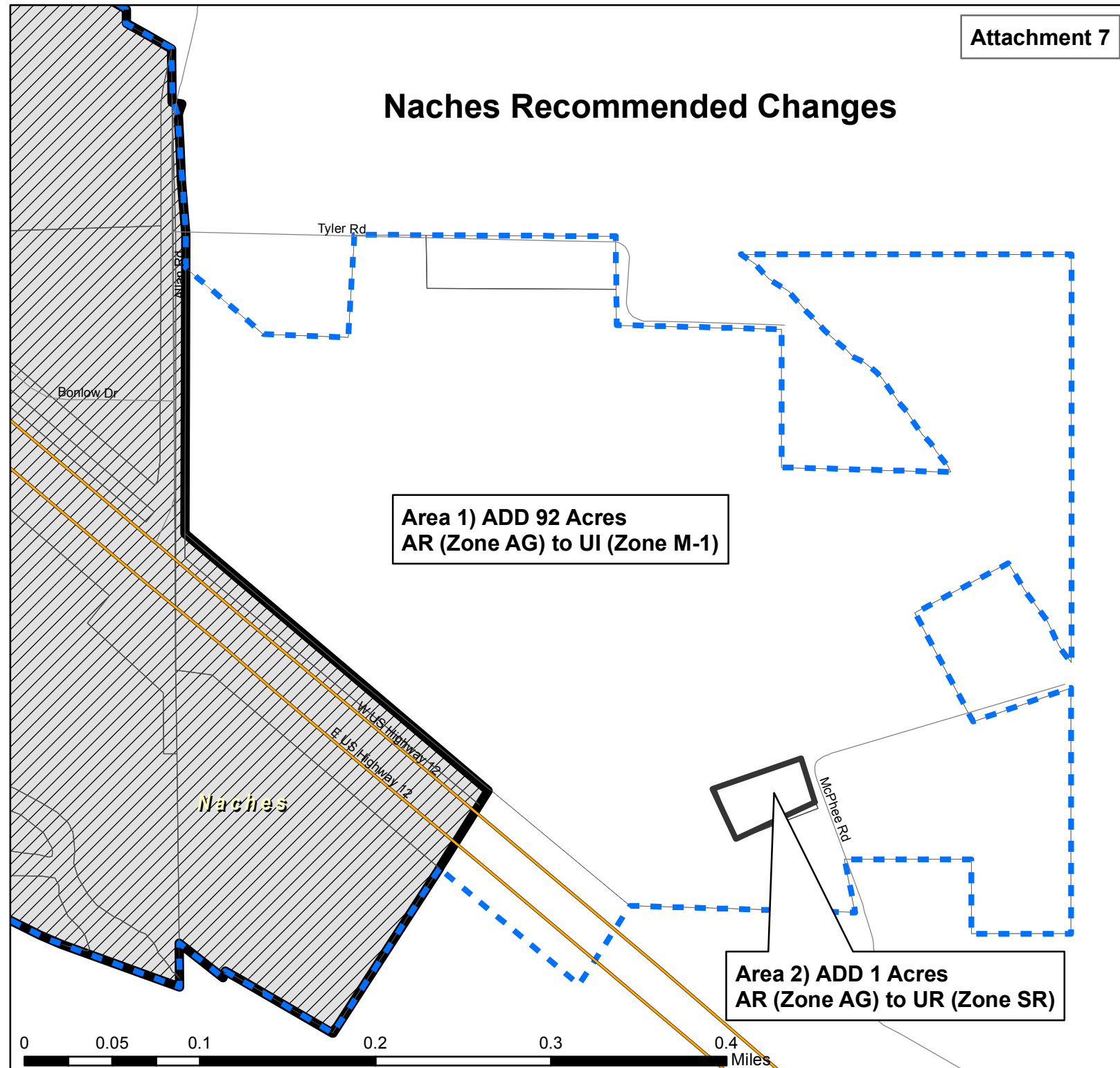
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# Naches Recommended Urban Plan Designations and Zoning Map



# 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

[Yakimap.com](http://Yakimap.com)

Date: 9/29/2016