

**Yakima County
Public Services Department
Planning Division**

Emergency Amendment

**Urban Growth Area for
Town of Naches**

**Staff Report
August 11, 2021**

Case: LRN2021-00001/SEP2021-00010
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1. Introduction

The Town of Naches has requested an emergency amendment to add eight sites for an approximate 40.17 acres into their urban growth area for residential use.

The Growth Management Act (GMA) requires that:

“(a) Each county that designates urban growth areas under RCW 36.70A.110 shall review, according to the schedules established in subsections (4) and (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)]

The last Urban Growth Area (UGA) periodic review and revisions, as required under RCW 36.70A.130(4), for Yakima County cities and towns were completed on December 27, 2016, to meet the June 30, 2017, deadline. The next GMA UGA periodic review as required by RCW 36.70A.130(5) is scheduled to be completed by June 30, 2026. This review for Naches will kick off the 2026 GMA UGA periodic review for Yakima County cities and towns.

The mandates mentioned above are being met by two reports:

- a. Report 1 – Yakima County Population and Employment Projections and Allocations issued on July 14, 2015, and projects the number of people within each of the County’s 14 UGAs to the year 2040. Attachment 2 is the excerpt from Report 1 showing the population projections for the Town of Naches.
- b. Report 2 – UGA Land Capacity Analysis identifies the current and proposed amount of (residential, commercial, community & retail, and industrial) land for each of the County’s 14 cities and towns has for future growth within their UGAs. The Land Capacity Analysis for

Naches' UGA is included as Attachment 3 ("UGA Land Capacity Analysis") and 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)

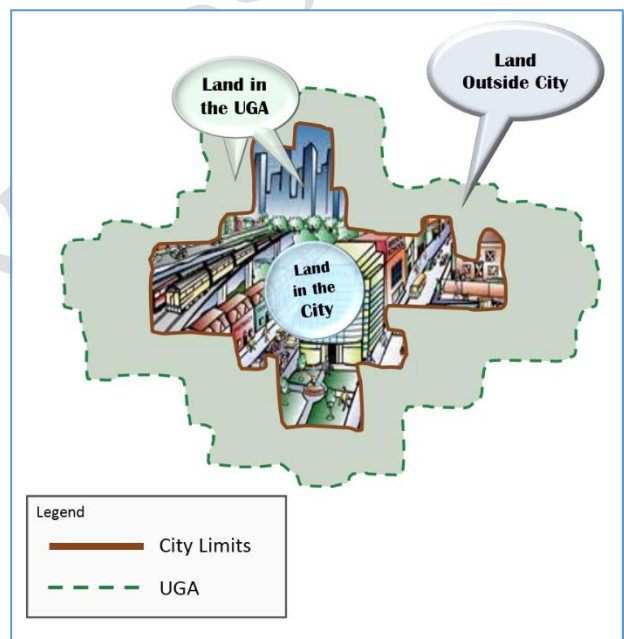
a. Overview

A LCA is a quantitative estimate of how much land a city or town will require as it grows over the succeeding 20-year period. It begins with consultation between a county, its cities and towns to select a population growth projected from a range of projections computed by the county from data provided by the state Office of Financial Management (OFM). Yakima County issued its population allocations and employment growth forecast in 2015 to assist in sizing UGAs to accommodate future urban growth. The specific population projections for the Town of Naches are shown in Attachment 2.

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

- 1) "*Land in town.*" This is used to describe lands within the town limit.
- 2) "*Land outside town.*" 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 town limits and the land outside the town.

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



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

b. Quantity of Land Calculations for Non-Industrial Uses

Yakima County planning staff coordinated with the Geographic Information Services (GIS) division to determine the current acreage of developed, vacant, and partially vacant³ residential,

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.,

commercial & retail, and community facilities in each zoning district to arrive at the figures used in the LCA spreadsheet ([Attachment 3](#)). Industrial lands are identified on the maps and accounted for in the LCA. 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 - *Horizon 2040*, 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 data is reported and depicted geographically in [Attachment 4](#).

The LCA calculations are described below and numbering of sections coincide with the LCA sections in the spreadsheet. The spreadsheet in [Attachment 3](#) performs the following calculations and provides additional information.

1. Population and Households Analysis: Based on Naches’s projected 2015-2040 population growth, this analysis estimates 101 additional households will be added to the town’s population by the year 2040.

2040 population forecast for town (County Planning)	1,084 people
2015 population (OFM’s April 1 estimate)	- 830 people
Population increase 2015-2040	= 254 people
Average household size (2010 Census)	÷ 2.51 people
Additional households 2015-2040	101 households

2. Future Residential Land Need: 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).

Based on this assumption, the acreage needed for future residential growth through 2040 with the projected number of new future households is as follows:

$$8,500 \text{ sq. ft.} \times 101 \text{ households} = 858,000 \text{ sq. ft.} \div 43,560 \text{ sq. ft. (1 acre)} = 20 \text{ Acres}$$

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 in town (as determined by GIS analysis):

$$254 \text{ people} \times 0.0595 \text{ acres per capita} = 15 \text{ Acres}$$

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 lands in town (as determined by GIS analysis):

$$254 \text{ people} \times 0.1257 \text{ acres per capita} = 32 \text{ Acres}$$

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.

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	+15 Acres
+Community facilities acreage needed	+32 Acres
=Subtotal	=67 Acres
Total streets acreage needed (Subtotal x 0.15)	10 Acres

67 acres of land needed + 10 acres of additional land for streets = 77 Acres

Or, as shown in Attachment 3 under Section “6 – Land Capacity Analysis” shows the calculations and total land needed for each zoning group plus the 15% of land needed for future streets. This number should also equal the 77 acres above. See summary below:

Total amount of vacant land needed in UGA for future growth and adjusted for future street requirements (excluding industrial lands need for growth):

Land needed for future housing and associated streets ⁴	23 Acres
+Land needed for future commercial & retail uses and associated streets ⁴	+17 Acres
+Land needed for future community facilities and associated streets ⁴	+37 Acres
=Total vacant acres needed for future non-industrial uses⁴	=77 Acres

6. Section 6 – Land Capacity Analysis “Surplus and Deficit” Summary: Using the figures in Attachment 3, Table 1 displays the surplus or deficit of vacant land each zoning group has to accommodate growth through 2040:

Table 1: Land Capacity Analyses (LCA) Summary – Excluding Industrial Zoned Land					
Zoning Group	Current Acreage			Proposed Acreage	
	Land in Town	Land Outside Town	Total: Land in UGA	Land Outside Town	Total: Land in UGA
Residential ⁴	Vacant: 41 acres	Vacant: 24 acres	Surplus: 65 acres	Vacant: 60 acres	Surplus: 101 acres
Commercial ⁴	Vacant: 35 acres	Vacant: 21 acres	Surplus: 56 acres	Vacant: 21 acres	Surplus: 56 acres
Community Facilities ⁴	Vacant: 19 acres	Vacant: 27 acres	Surplus: 46 acres	Vacant: 27 acres	Surplus: 46 acres
Zoning Groups ⁴ Total	Vacant: 95 acres	Vacant: 72 acres	Surplus: 167 acres	Vacant: 108 acres	Surplus: 203 acres

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

⁴ Including associated streets

Table 2: LCA Summary – In Town and In UGA – Excluding Industrially-zoned Land	
Naches Existing	Naches Proposal
Capacity for Growth within Town: 95 (Acres of vacant land in Town) - 77 (Acres needed for growth) = 18 (Surplus vacant acres of land in Town)	No proposed changes within Town limits.
Capacity for Growth within UGA: 72 (Acres of vacant land outside town) + 95 (Acres of vacant land in Town) - 77 (Acres of land needed for growth ⁴) = 90 (Surplus vacant acres of land in UGA)	Capacity for Growth within the UGA: 108 (Acres of vacant land outside town) + 95 (Acres of vacant land in Town) - 77 (Acres of land needed for growth ⁴) = 126 (Surplus vacant acres of land in UGA)

A map showing the existing 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.

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 town and within its UGA is to express the surplus (or deficit) as a percentage of the amount of vacant land that is needed for growth over the 25-year period from 2015 to 2040. For example, if a town 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 town has a 20% MCF as computed above, 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. Example 2, if a town 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:

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

$$\text{Example 1: } (20\% \text{ MCF} + 1) \times 25 \text{ years} = 30 \text{ years of growth available}$$

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

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)				
	Lands in the Town	Lands outside Town	Growth within Current UGA	Growth within Proposed UGA
Computed MCF	23%	N/A	117%	164%
Years of growth available	31 years	23 years	54 years	66 years

c. Future Industrial Land Needs

Naches is not proposing any lands to be added to industrial. The GIS analysis provides the following current acreages of industrially-zoned lands (Attachment 3, Section “7 – Future Industrial Land Need”):

Existing Industrial-Zoned Lands	Acreage
Current developed industrially-zoned land in town	99 Acre
Current developed industrially-zoned land outside town	32 Acres
Current vacant industrially-zoned land in town	10 Acres
Current vacant industrially-zoned land outside town	12 Acres
Industrial acres to add to UGA	0 Acres
Industrial acres to remove from UGA	0 Acres

3. Review of Densities Permitted in the UGA

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

Naches has five zoning districts within its town limits. These zoning districts are R-1 (Single Family Residential), R-2 (Single and Two Family Residential), GB (General Business), L-1 (Light Industrial), and PLI (Public Lands/Institutions).

The residential zoning districts and corresponding densities are as follows:

Town of Naches Zoning (Title 17 Naches Development Regulations)		
Zoning District	Minimum Lot Size	Density
R-1 (Residential)	7,200 sq. ft.	Single-Family Residence
	8,200 sq. ft.	Duplex
R-2 (Residential)	5,000 sq. ft.	Single-Family Residence
	8,200 sq. ft.	Duplex
	10,200 sq. ft.	Triplex
	12,200 sq. ft.	Fourplex

Yakima County UGA in the Urban Growth Area (Yakima County Code Title 19.12)		
Zoning District	Minimum Lot Size	Density
R-1 (Single Family Residential)	4,000 – 10,000 sq. ft. (depending on use) 7,000 sq. ft.	7 units per acre

	for single-family residence	
R/ELDP-40	40 or legally described as 1/16 of a section	1 unit per 40 acres

There are currently 41 acres of vacant Residential zoned lands in the Town of Naches. 20.4 acres are in the “Floodplain Constrained” areas and have the potential for 23 lots. See section 4 Town/County Collaboration and subsection 5(1)(c) of the Major Rezone and Plan Amendment Review Criteria below for a further explanation of these floodplain constrained areas based on the YCC subdivision guidelines. If the other 20.6 acres of vacant Residential zoned land in town is developed with single-family residents on 7,200 sq. ft. lots, an additional 125 new single family homes could be developed within the town limits. If R-2 zoned land is developed to the highest density, the number would be higher.

Naches currently has 24 acres of vacant Residential zoned land outside town. The residential land in Naches’s UGA is zoned R-1 and R/ELDP-40 zoning districts. The R-1 allows for a maximum density of 7 units per acre while the R/ELDP-40 allows for a maximum density of 1 unit per 40 acres. See subsection 5(1)(c) of the Major Rezone and Plan Amendment Review Criteria below for a further explanation of R/ELDP-40 zoning constraints based on the YCC zoning subdivision requirements. Built to the maximum density, the current UGA could accommodate 123 new homes in the R-1 zone and 9 in the R/ELDP-40 zone. Again, assuming that an average lot size of 8,500 square feet or 5.1 dwelling units per acre and no requirements to develop to the maximum density, it is unlikely that the residential land within Naches town limits or UGA will develop to the maximum density.

Altogether, the total number of new single-family homes that could be accommodated within the Naches UGA is 280 new lots or single family homes.

Potential Number of Residential Lots	
Floodplain Constrained	23
Residential Land in Town	125
Residential Land Outside Town (R-1)	123
Residential Land Outside Town (R/ELDP-40)	9
Total	280

4. Town/County Collaboration

County staff met with Jeff Ranger, Town Administrator, on May 14, 2021, to review the town’s emergency request, proposed future land use designations, and planning issues. Mr. Ranger informed staff that the school is showing interest in parcel 171403-22015 for a future expansion and requested that the zone group be changed from residential to community facilities. He also requested that the county review the development potential of lands south of the highway and within the Naches River shoreline jurisdiction.

After a careful review of the County’s development standards, County staff applied YCC subsections 19.34.050(5)(a)(vi)(B) “Subdivision standards” and YCC 16D.03.27(3)(b)(iv) “General Critical Areas Protective Measures standards” as allowed to the LCA calculations. Both of these subsections restrict the divisibility of residential lands of “new lots entirely within the

floodplain shall be at least one (1) acre in area.” For example, a two acre parcel in that is entirely covered in the floodplain can only be divided down to 1 acre minimums, resulting in two lots, and not 8,500 (county) square foot minimum lot sizes as it was previously calculated for. The benefits of applying this restriction are for consistency with YCC subdivision guidelines which shows that the Town had less vacant land therefore reducing the number of years of growth. See Attachment 4 for “Residential Floodplain Constrained” areas.

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;

Findings: This proposed amendment is consistent with the UGA review criteria and procedural requirements.

(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;

Findings: Yakima County staff supports the conclusion that this proposal is consistent with the above criteria. All of the subject sites are zoned AG and designated Agricultural Resource (AR) except parcel 171533-43005 which is zoned Rural-10/5 (R-10/5) and designated Rural Self-Sufficient (RSS). The proposed small lots have historically been used for residential and large lots for agricultural production. However, parcels 171404-12404, 171403-42004, and 171403-42023 have ceased orchard agricultural production since 2013 based on satellite images. The residences on the R-10/5 lot and small AG lots consisting of parcels 171404-12401, 17104-12402, 171404-12403, and 171403-42005 were constructed between 1930 through 1960. The sizes of these lots range from 0.33 to 5.14 acres. The addition of these four small AG lots to the Naches UGA would be considered “developed” by the LCA analysis criteria and not count against the town’s years of growth. Developed means when a lot size is less than or equal to one acre and has an improvement cost greater than or equal to \$10,000.

Attachment 7 is the “AG Resource De-Designation Analytical Process.” This analysis further supports the proposed map designation due to obtaining a score of 8 or higher out of 10 in favor of de-designating all AG lots. The de-designation review criteria for AG lots are required by the County’s Comprehensive Plan - ***Horizon 2040***. Based on the above information, these sites have been found to be consistent with this review criteria.

- (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;*

Findings: The proposed sites are suitable for the proposed residential designations based on the following:

The Town of Naches's written request, dated March 3, 2021 (Attachment 8), for consideration of an emergency amendment to their UGA, stated that the Town "does not have any residential zoned developable properties available." The proposed sites are within 1,000' of public utilities services and paved county & town roads. According to Naches's request letter, the Town is currently under contract for a \$1.5 million dollar wastewater improvement project and coordinating with the U.S. Department of Agriculture for \$4.3 million dollar second phase improvements to serve these sites.

A review of the available vacant and partially developed residential lots within Naches's UGA has determined that these variable lots sizes are unsuitable for infill development since the large lots are still being used for AG production. All are lacking public utilities and road infrastructure to serve these sites. Furthermore, the lots south of the highway also have environmental, floodplain and minimum lot size constraints. The Attachment 4 map shows these areas identified as "Environmentally Constrained," "Residential Floodplain Constrained," and "Residential-R/ELDP Constrained." The environmentally constrained lots cannot be developed due to the Floodway/Channel Migration Zone (CMZ) and taken out of the equation for vacant land. The floodplain constrained means "new lots entirely in the floodplain shall be at least one (1) acre in area" per Yakima County Code (YCC) 16D.03.27(3)(b)(iv). And the Residential-R/ELDP or the Remote/Extremely Limited Development Potential-40 zoning district has a 40 acre minimum lot size. All of these lots are less than 40 acres and are no longer divisible whether they are vacant or partially developed. For zoning code consistency and LCA calculations, a density of 5 units per acre with a maximum lot size of 0.20 acres were established and applied to each parcel restricting further divisions of land. A residence on any of these parcels would make it developed (improvement greater than or equal to \$10,000) regardless of the lot size.

The lots in the floodplain and R/ELDP-40 were previously grouped into one residential zoning group in the LCA and given a maximum consideration for the potential division of land down to 8,500 square feet minimum lot sizes. This overinflated the actual available residential land and number of years of growth. Naches's LCA (Attachment 3) has been adjusted to ensure consistency with the YCC Titles 19 and 16D in restricting these constrained lands from being further divided than what county code allows. Based on this analysis, the LCA shows a substantial reduction of vacant residential land from 82 acres to 52.23 acres since the last UGA update in 2016. The Naches School District is also interested in an adjacent 28.23 acre parcel east of the high school. The zoning group change from residential to community facilities will reduce Naches's existing vacant residential land to 24 acres (see Attachment 3).

- (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;*

Findings: No specific study was provided regarding the need for the inclusion of this land into the UGA, with the exception of the Town's request letter highlighting the investments to ensure public wastewater systems are available to serve these sites.

- (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;*

Findings: This proposal has been reviewed with the AG Resource De-Designation Analytical Process criteria (Attachment 7). The results of the analysis has obtained a score in favor of de-designating the AG resource lands and therefore consistent with this criteria.

- (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;*

Findings: Public utilities such as water and sewer are less than 1,000' away from the subject sites. As discussed in subsection (c) above, the Town is under contract and seeking interagency funding for wastewater improvements. As required by YCC 16B.10.095, the Town of Naches will be required to submit an official addendum to their capital facilities plan that the adequate facilities will be funded and made available to these sites prior to the hearing with the Yakima County Board of County Commissioners. In addition, all of the subject sites are adjacent to a county or town paved road or have access to them.

Other town public facilities and services available include Fire District #3, Fire Station 16, sheriff, the Naches Library and Naches Valley School District.

- (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: Yakima County does not foresee that this UGA amendment will increase pressure for additional UGA boundary changes.

Overall Findings: The proposal is consistent with the above criteria.

(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 the above criteria. The proposal has also been reviewed under the AG Resource De-Designation Process as outlined in ***Horizon 2040***, Chapter 5.10.3 (Attachment 7).

(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 designation and zoning (see Attachment 6).

(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: The impacts of the proposed use will be reviewed as part of the SEPA analysis (file # SEP2021-00010).

- (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 the Naches 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 the Naches UGA are map amendments rather than policy or text amendments.

6. **Conclusions**

- The existing Naches LCA shows a reduction of 21 years of growth from 75 years to 54 years from the previous LCA with the YCC Titles 19 and 16D consistency updates for residential R/ELDP-40 zoning and floodplain land division requirements.
- Naches proposal to add the 40.17 acres shows an increase of 11 years for a total of 66 years of growth in the UGA.
- The request to add the proposed sites to the UGA is consistent and supported by the Town's request for residential land, public utilities investments, and the AG de-designation review criteria.

7. **Recommendations**

Therefore, Yakima County planning staff recommends APPROVAL of the Town of Naches's proposed UGA changes as outlined in the Table below: (Map showing each area is included in Attachment 6.)

Naches Proposal							
Parcel No(s)	Location	Add to UGA	Current Land Use Designation	Current Zone	Proposed Land Use Designation	Proposed Zone	County Planning Recommendation
171533-43005	Area 1	5.14	Rural Self-Sufficient	Rural-10/5 (R-10/5)	Urban Residential	Single-Family Residential (R-1)	Approve
171404-12404	Area 2	9.98	Agricultural Resource	Agriculture (AG)	Urban Residential	Single-Family Residential (R-1)	Approve
171404-12403		0.5	Agricultural Resource	Agriculture (AG)	Urban Residential	Single-Family Residential (R-1)	Approve
171404-12402		0.5	Agricultural Resource	Agriculture (AG)	Urban Residential	Single-Family Residential (R-1)	Approve
171404-12401		0.98	Agricultural Resource	Agriculture (AG)	Urban Residential	Single-Family Residential (R-1)	Approve
171403-42004	Area 3	7.4	Agricultural Resource	Agriculture (AG)	Urban Residential	Single-Family Residential (R-1)	Approve
171403-42005		0.33	Agricultural Resource	Agriculture (AG)	Urban Residential	Single-Family Residential (R-1)	Approve
171403-42023		15.34	Agricultural Resource	Agriculture (AG)	Urban Residential	Single-Family Residential (R-1)	Approve

Attachments:

1. ***Horizon 2040***'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 Existing UGA Analysis 2021 (GIS Map & Report)
5. Naches Proposed UGA Analysis 2021 (GIS Map & Report)
6. Naches Proposed Plan Designations and Zoning Map
7. Agricultural Resource De-Designation Analytical Process
8. Town of Naches "Emergency Request for Naches UGB"

5.8.1 Urban Lands Sub-Element Purpose

The Urban Lands Sub-element serves several purposes. It first outlines the Growth Management Act (GMA) requirements with respect to urban lands and the process used to establish an Urban Growth Area (UGA) around each of the County's fourteen cities. This is followed by a discussion of the major issues confronting urban area growth. The Sub-Element goes on to describe the land use character of the UGAs, their population and the future growth projections that must be used by each. Although more recent population estimates are available, the 2015 data is used because it is the baseline for establishing the Urban Growth Areas. Projections are then compared to current consumption patterns to determine if an appropriate urban land base has been designated to meet various future needs.

The Sub-Element briefly discusses how Yakima County will work with the cities to plan for and facilitate urban area growth. It concludes with a series of goals and policies to guide future development within the unincorporated urban areas.

5.8.2 Urban Lands - Growth Management Act Requirements

The Growth Management Act (GMA) includes the following goals that directly relate to urban land use:

- (1) Urban Growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.
- (2) Reduce Sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.
- (3) Transportation. Encourage efficient multimodal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans.
- (6) Property Rights. Property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.
- (12) Public Facilities and Services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.

5.8.3 Urban Lands – Urban Growth Areas

General Description Urban lands are the areas located within UGA boundaries, which are established by the County in consultation with the cities and towns. In general, each of Yakima County's UGA's includes one of Yakima County's fourteen cities and towns plus additional area extending beyond the city or town. 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 twenty-year planning period. The Growth Management Act, RCW 58.17

5.8.3.1 Urban Growth Area Designation Process

GMA requires counties to designate Urban Growth Areas (UGA) where development is encouraged and outside which growth can occur only if it is not urban in nature. At a minimum, each city within the County must be included within a UGA. Additionally, a UGA may include land outside of a city but only if it is already characterized by urban growth. Lands not characterized by, or next to, urban growth may be included within a UGA only if the need for it is shown based on projected growth. Perhaps the most important aspect of designating UGA boundaries is the demonstration by cities and towns that they may feasibly serve these lands with urban level services over a twenty-year period.

As required by the GMA, and consistent with desired future settlement patterns, most new housing and jobs will be created within Yakima County's fourteen UGAs. Likewise, most investment in public facilities and services will occur here to ensure the most cost-efficient use and operation of necessary utility systems.

In unincorporated areas within UGA boundaries, Horizon 2040 establishes several urban land use designations 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.

UGAs are 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. UGA boundaries are intended to establish the areas within which incorporated cities and towns may grow and annex over the next twenty years. Yakima County's UGAs are 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." The process for which Urban Growth Areas are designated is outlined below:

- **Population Allocation**

Development of population projections for the Growth Management Act (GMA) is a shared responsibility. As directed by state statute, the Washington State Office of Financial Management (OFM) prepares a reasonable range of possible population growth for Washington counties participating in GMA. Yakima County, also by law, is responsible for selecting a 20-year GMA planning target from within the range of high and low prepared by OFM. The County must select the county planning target; then

the population planning targets for each city or town, and unincorporated areas. Once the population is allocated the projections are used by each jurisdiction as part of the GMA comprehensive planning update and in conjunction with the Land Capacity Analysis.

- **Land Capacity Analysis**

The purpose of the Land Capacity Analysis is to determine how much land, if any, is needed beyond the incorporated limits of each city and town to accommodate the urban growth and development that is projected to occur during the 20-year planning horizon. It begins with determining the existing supply of existing vacant and partially vacant lands zoned for future development that can accommodate additional growth. 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.

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.

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. All capital and public facilities needed for future growth must be included in the Capital Facilities Plan. These needed facilities may be identified in comprehensive plan elements, in the jurisdiction's functional plans, or in the plans of other entities that provide services or facilities.

• **Mapping Criteria for New UGA areas:**

1. Lands contiguous with other properties that are, or should be, included in an urban growth area.
2. Lands that take advantage of physical features to help provide a clear separation between urban and rural areas. No physical barriers (e.g., rivers, railroads, irrigation ditches, freeways) are present that would make the area difficult to serve at an adopted level of service standard.
3. The County and the respective city or town have mutually determined that urban services will be present within the 20-year time frame of the plan, as illustrated within the city's capital facilities plan.
4. Lands with ready access to urban services (e.g., major roads, schools, public safety, water or sewer utilities), or lands needed to achieve local economic development goals / plan policies and where there is a plan and financial strategy for putting these services in place in accordance with the jurisdiction's comprehensive, subarea or neighborhood plan.
5. Lands needed for public capital facilities and utilities.
6. Lands that do not have long term commercial significance for commercial agricultural or mineral production and should be able to develop without having a detrimental effect on nearby resource lands outside the Urban Growth Area; or, lands needed for urban growth and it has been conclusively demonstrated that significantly better alternatives to the development of productive resource lands are not available.

Attachment 2

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.

Attachment 2

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.

Attachment 3

"UGA Land Capacity Analysis"
Yakima County Department of Public Services - Planning Division
12-27-2016 BOCC Decision

UGA Land Capacity Analysis		Units	Naches Current w/ Constraints 7-22-21	Naches Proposed w/ Constraints 7-29-21
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	49	49
i	Current developed commercial & retail land in City per person (h ÷ b)	acres per person	0.0595	0.0595
j	Land needed for future commercial & retail (i • c)	acres	15	15
4 - Future Community Facilities* Land Need				
k	Current developed community facilities land in City (from GIS analysis)	acres	104	104
m	Current developed community facilities land in City per person (k ÷ b)	acres per person	0.1257	0.1257
n	Land needed for future community facilities (m • c)	acres	32	32
5 - Future Streets Land Need				
p	Subtotal of land needed for future residential, commercial & retail, and community facilities (g + j + n)	acres	67	67
q	Land needed for future streets (p • 15%)	acres	10	10
6 - Land Capacity Analysis				
<u>Residentially-zoned capacity</u>				
r	Current vacant residentially-zoned land in City (from GIS analysis)	acres	41	41
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	18	18
u	Current vacant residentially-zoned land outside City (from GIS analysis)	acres	24	60
v	(plus) Surplus (Deficit) of vacant residentially-zoned land in City (t)	acres	18	18
w	= Surplus (Deficit) of vacant residentially-zoned land in UGA (u + v)	acres	42	78
<u>Commercially-zoned capacity</u>				
x	Current vacant commercially-zoned land in City (from GIS analysis)	acres	35	35
y	(minus) Land needed for future commercial & retail and associated streets (-j • 115%)	acres	(17)	(17)
z	= Surplus (Deficit) of vacant commercially-zoned land in City (x + y)	acres	18	18
aa	Current vacant commercially-zoned land outside City (from GIS analysis)	acres	21	21
bb	(plus) Surplus (Deficit) of vacant commercially-zoned land in City (z)	acres	18	18
cc	= Surplus (Deficit) of vacant commercially-zoned land in UGA (aa + bb)	acres	39	39
<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	(37)	(37)
ff	= Surplus (Deficit) of vacant community facilities in City (dd + ee)	acres	(18)	(18)
gg	Current vacant community facilities land outside City (from GIS analysis)	acres	27	27
hh	(plus) Surplus (Deficit) of vacant community facilities land in City (ff)	acres	(18)	(18)
ii	= Surplus (Deficit) of vacant community facilities land in UGA (gg + hh)	acres	9	9
<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	18	18
kk	Computed Market Choice Factor in City (MCF)**	%	23%	23%
mm	Years of growth available in City ((kk + 1) • 25)	years	31	31
<u>Capacity for growth outside City (excluding Industrial growth)</u>				
nn	Years of growth available outside City (rr - mm)	years	23	35
<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	90	127
qq	Computed Market Choice Factor in UGA (MCF)***	%	117%	164%
rr	Years of growth available in UGA ((qq + 1) • 25)	years	54	66
7 - Future Industrial Land Need				
ss	Current developed industrially-zoned land in City (from GIS analysis)	acres	99	99
tt	Current developed industrially-zoned land outside City (from GIS analysis)	acres	32	32
uu	Current vacant industrially-zoned land in City (from GIS analysis)	acres	10	10
vv	Current vacant industrially-zoned land outside City (from GIS analysis)	acres	12	12
ww	Industrial acres to add to UGA (based on City's economic development strategy)	acres	0	0
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

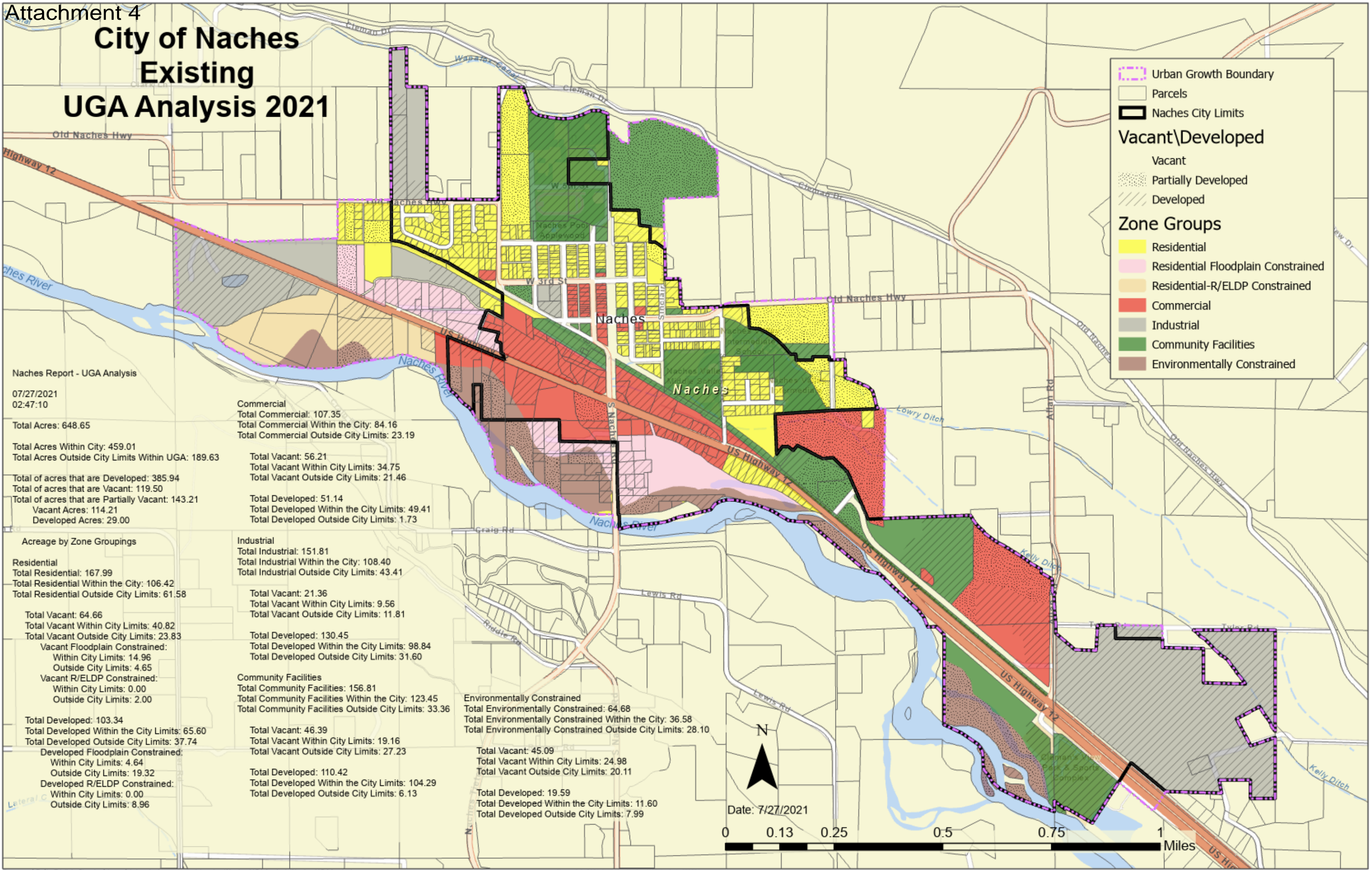
Note: numbers in parentheses are negative

Attachment 4

City of Naches

Existing

UGA Analysis 2021



Naches Report - UGA Analysis

07/27/2021
02:47:10

Total Acres: 648.65
Total Acres Within City: 459.01
Total Acres Outside City Limits Within UGA: 189.63

Total of acres that are Developed: 385.94
Total of acres that are Vacant: 119.50
Total of acres that are Partially Vacant: 143.21
Vacant Acres: 114.21
Developed Acres: 29.00

Acreage by Zone Groupings

Residential
Total Residential: 167.99
Total Residential Within the City: 106.42
Total Residential Outside City Limits: 61.58

Total Vacant: 64.66
Total Vacant Within City Limits: 40.82
Total Vacant Outside City Limits: 23.83
Vacant Floodplain Constrained:
Within City Limits: 14.96
Outside City Limits: 4.65
Vacant R/ELDP Constrained:
Within City Limits: 0.00
Outside City Limits: 2.00

Total Developed: 103.34
Total Developed Within the City Limits: 65.60
Total Developed Outside City Limits: 37.74
Developed Floodplain Constrained:
Within City Limits: 4.64
Outside City Limits: 19.32
Developed R/ELDP Constrained:
Within City Limits: 0.00
Outside City Limits: 8.96

Commercial
Total Commercial: 107.35
Total Commercial Within the City: 84.16
Total Commercial Outside City Limits: 23.19

Total Vacant: 56.21
Total Vacant Within City Limits: 34.75
Total Vacant Outside City Limits: 21.46
Total Developed: 51.14
Total Developed Within the City Limits: 49.41
Total Developed Outside City Limits: 1.73

Industrial
Total Industrial: 151.81
Total Industrial Within the City: 108.40
Total Industrial Outside City Limits: 43.41

Total Vacant: 21.36
Total Vacant Within City Limits: 9.56
Total Vacant Outside City Limits: 11.81
Total Developed: 130.45
Total Developed Within the City Limits: 98.84
Total Developed Outside City Limits: 31.60

Community Facilities
Total Community Facilities: 156.81
Total Community Facilities Within the City: 123.45
Total Community Facilities Outside City Limits: 33.36

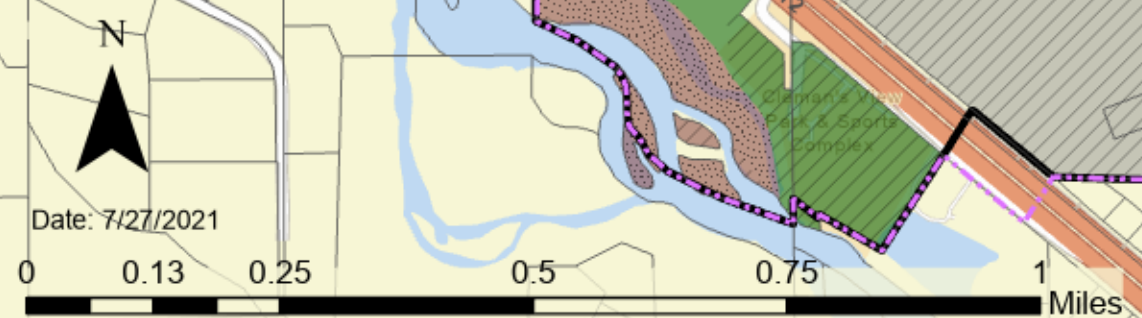
Total Vacant: 46.39
Total Vacant Within City Limits: 19.16
Total Vacant Outside City Limits: 27.23

Total Developed: 110.42
Total Developed Within the City Limits: 104.29
Total Developed Outside City Limits: 6.13

Environmentally Constrained
Total Environmentally Constrained: 64.68
Total Environmentally Constrained Within the City: 36.58
Total Environmentally Constrained Outside City Limits: 28.10

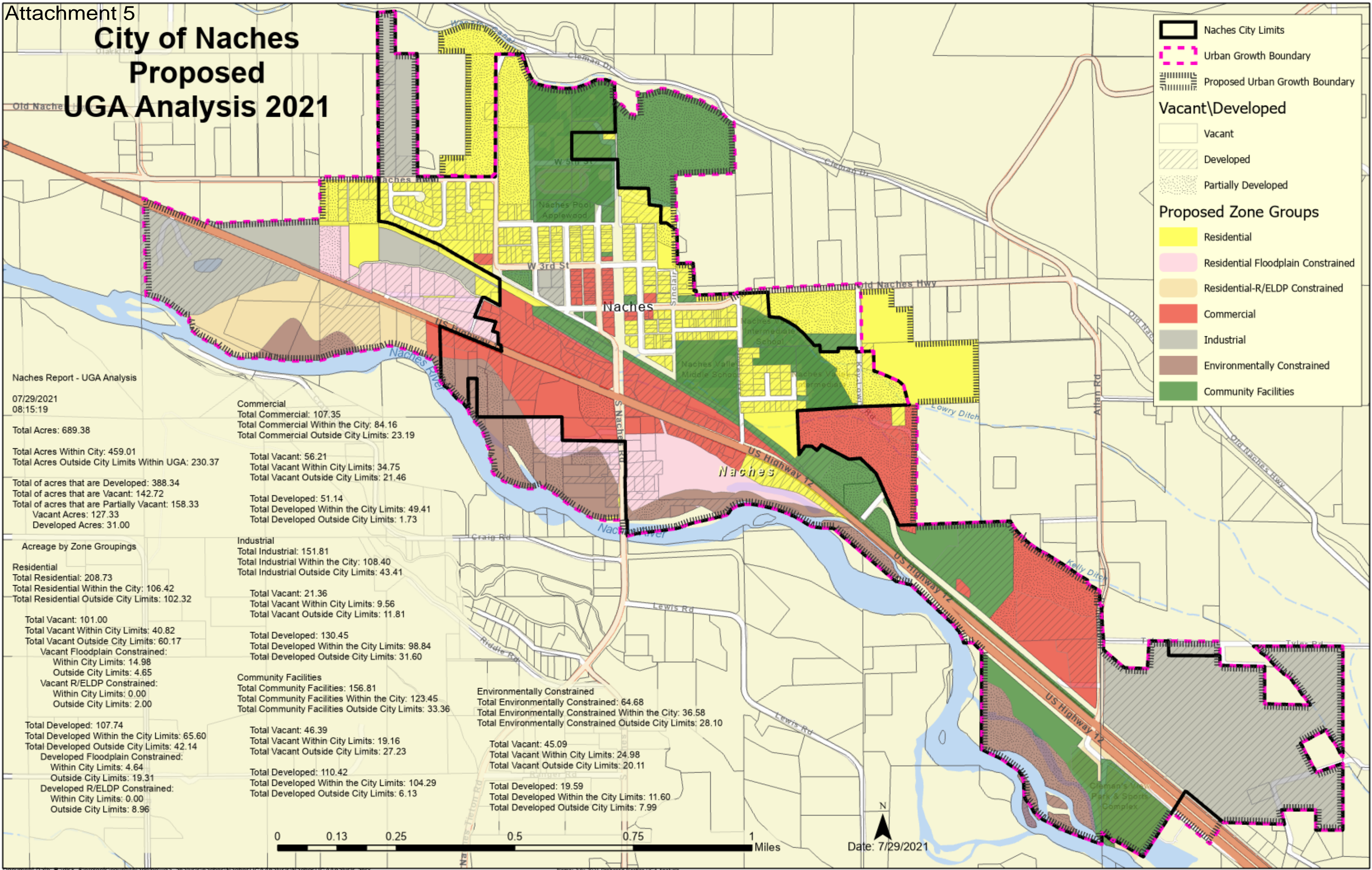
Total Vacant: 45.09
Total Vacant Within City Limits: 24.98
Total Vacant Outside City Limits: 20.11

Total Developed: 19.59
Total Developed Within the City Limits: 11.60
Total Developed Outside City Limits: 7.99



Attachment 5

City of Naches Proposed UGA Analysis 2021



Naches Report - UGA Analysis

07/29/2021
08:15:19

Total Acres: 689.38

Total Acres Within City: 459.01
Total Acres Outside City Limits Within UGA: 230.37

Total of acres that are Developed: 388.34
Total of acres that are Vacant: 142.72
Total of acres that are Partially Vacant: 158.33
Vacant Acres: 127.33
Developed Acres: 31.00

Acreage by Zone Groupings

Residential
Total Residential: 208.73
Total Residential Within the City: 106.42
Total Residential Outside City Limits: 102.32

Total Vacant: 101.00
Total Vacant Within City Limits: 40.82
Total Vacant Outside City Limits: 60.17
Vacant Floodplain Constrained:
Within City Limits: 14.98
Outside City Limits: 4.65
Vacant R/ELDP Constrained:
Within City Limits: 0.00
Outside City Limits: 2.00

Total Developed: 107.74
Total Developed Within the City Limits: 65.60
Total Developed Outside City Limits: 42.14
Developed Floodplain Constrained:
Within City Limits: 4.64
Outside City Limits: 19.31
Developed R/ELDP Constrained:
Within City Limits: 0.00
Outside City Limits: 8.96

Commercial
Total Commercial: 107.35
Total Commercial Within the City: 84.16
Total Commercial Outside City Limits: 23.19

Total Vacant: 56.21
Total Vacant Within City Limits: 34.75
Total Vacant Outside City Limits: 21.46

Total Developed: 51.14
Total Developed Within the City Limits: 49.41
Total Developed Outside City Limits: 1.73

Industrial
Total Industrial: 151.81
Total Industrial Within the City: 108.40
Total Industrial Outside City Limits: 43.41

Total Vacant: 21.36
Total Vacant Within City Limits: 9.56
Total Vacant Outside City Limits: 11.81

Total Developed: 130.45
Total Developed Within the City Limits: 98.84
Total Developed Outside City Limits: 31.60

Community Facilities
Total Community Facilities: 156.81
Total Community Facilities Within the City: 123.45
Total Community Facilities Outside City Limits: 33.36

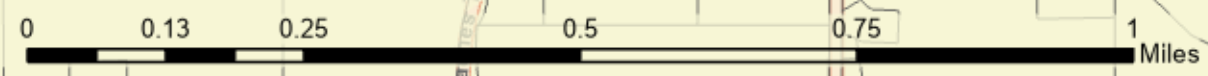
Total Vacant: 46.39
Total Vacant Within City Limits: 19.16
Total Vacant Outside City Limits: 27.23

Total Developed: 110.42
Total Developed Within the City Limits: 104.29
Total Developed Outside City Limits: 6.13

Environmentally Constrained
Total Environmentally Constrained: 64.68
Total Environmentally Constrained Within the City: 36.58
Total Environmentally Constrained Outside City Limits: 28.10

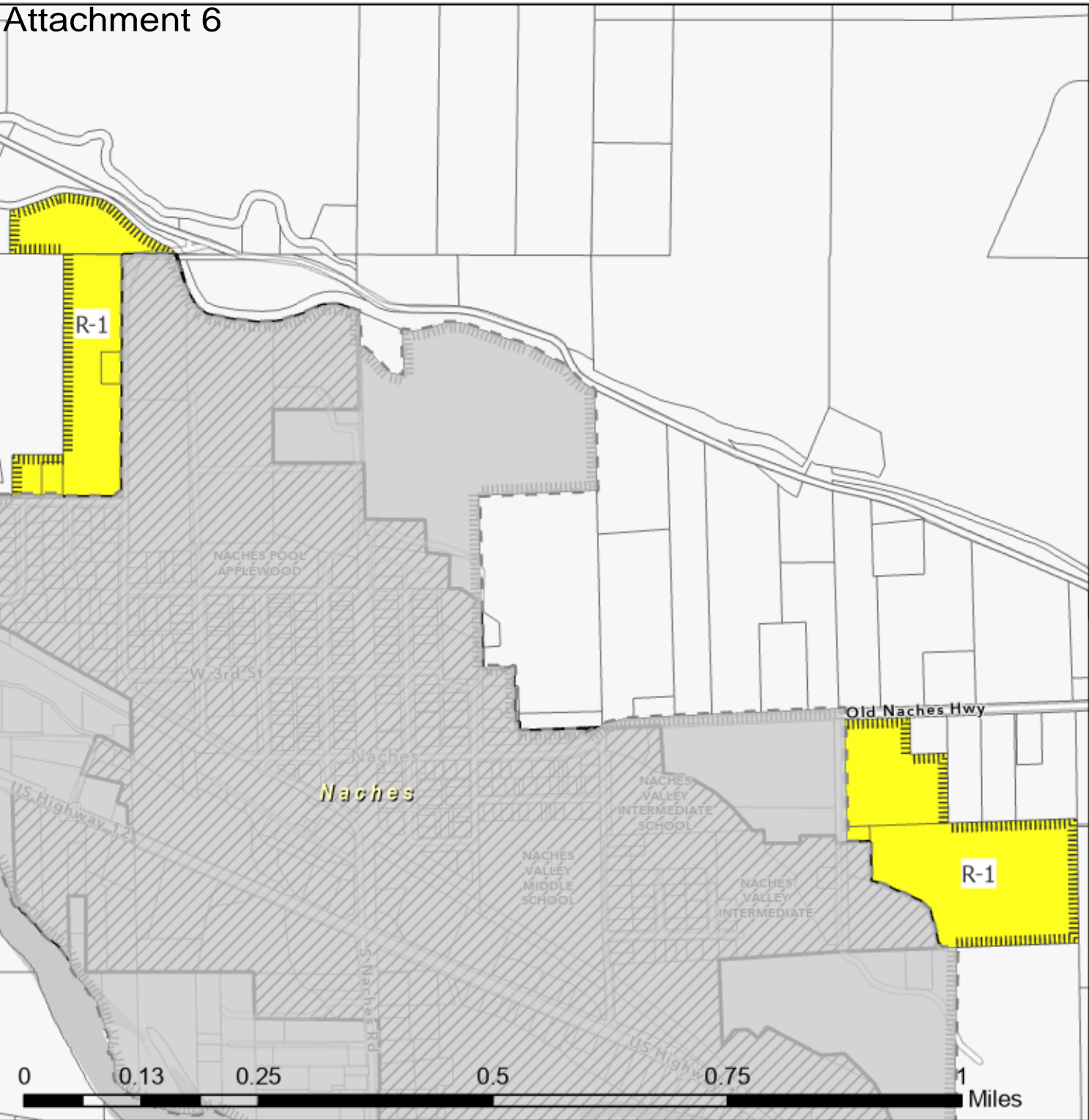
Total Vacant: 45.09
Total Vacant Within City Limits: 24.98
Total Vacant Outside City Limits: 20.11

Total Developed: 19.59
Total Developed Within the City Limits: 11.60
Total Developed Outside City Limits: 7.99



N

Date: 7/29/2021



YAKIMA COUNTY
GEOGRAPHIC INFORMATION SYSTEM

Naches UGA

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

Naches City Limits

Urban Growth Boundary

Proposed Urban Growth Boundary

Parcels

County Zoning

R-1 - Single Family Residential

County Comprehensive Plan Designations

Urban Residential

Parcel Lot lines are for visual display only.
Do not use for legal purposes.

Yakimap.com

Copyright (C) Yakima County
This map was derived from several databases. The County cannot accept responsibility for any errors. Therefore, there are no warranties for this product.

Attachment 7

Agricultural Resource De-Designation Analytical Process Naches Proposed Emergency UGA Amendment

The "Quantitative Analytical Process" of the Agricultural (AG) Resource De-designation Analytical Process is found in the Land Use subchapter of **Horizon 2040**, Chapter 5.10.3, immediately following the mapping criteria for Agricultural Resource Areas. Adopted in 2017, 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 agricultural land of long term commercial significance"* (Horizon 2040, Land Use Element Chapter 5, page 56).

The 10 factors in **Horizon 2040** 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>464 to 330 bu/ac crop yield</i>	<i>0 points [Lowest]</i>
<i>598 to 465 bu/ac crop yield</i>	<i>1 point [Below Average]</i>

732 to 599 bu/ac crop yield	2 points [Average]
866 to 733 bu/ac crop yield	3 points [Above Average]
1000 to 867 bu/ac crop yield	4 points [Highest]

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: This first criterion only relates to analyzing the productivity of soils in relation to the highest yielding crop (irrigated apples) measured by bushels per acre (bu/ac). The scoring of this criterion does not consider any other potential factors due to a rezone, de-designation, or impacts from the surrounding location or built environment. For example, if the soil results achieve above average or highest crop yield scores, the answer to this criterion would be having “no” impact to agriculture because the soils are productive. If below average or lowest crop yield scores are obtained, the answer would be a “yes” and an impact to agriculture because the soils are not in a productive class, yielding little to no crops.

According to the U.S. Department of Agriculture's “Soil Survey of Yakima County Area Washington” (Soil Survey):

“Yields are those that can be expected under a high level of management. Absence of a yield indicates that the soil is not suited to the crop or the crop generally is not grown on the soil. Only the soils suited to crops are listed.”

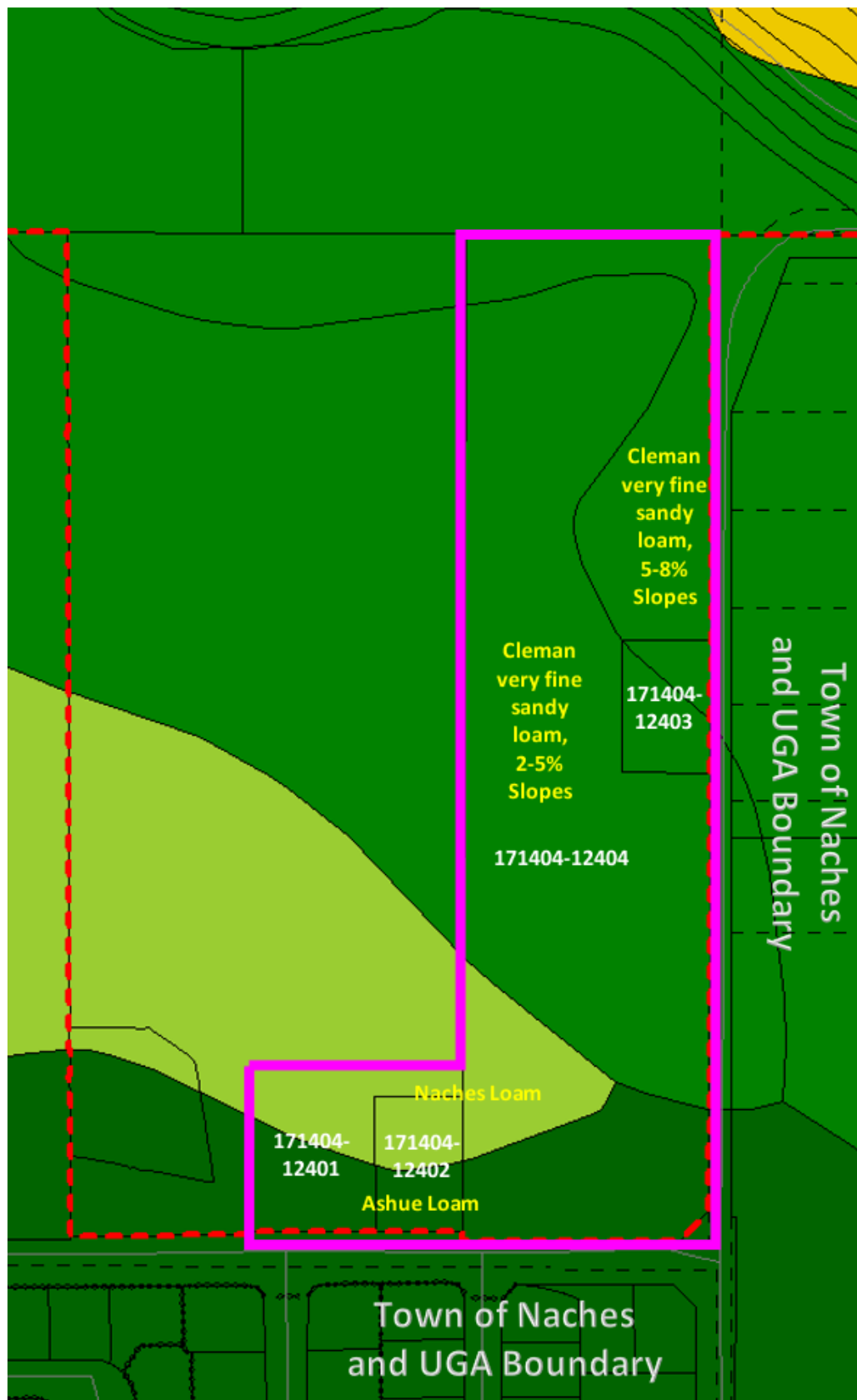
Based on the statement above, every other crop listed in “Table 5 - - Yields Per Acre of Crops and Pasture” of the Soil Survey (such as winter wheat, alfalfa hay, corn, asparagus, and distillate mint) are not high yielding crops nor considered in this criterion due to reporting little to no bu/ac crop yields, resulting with the lowest soil scoring category of zero (0) points.

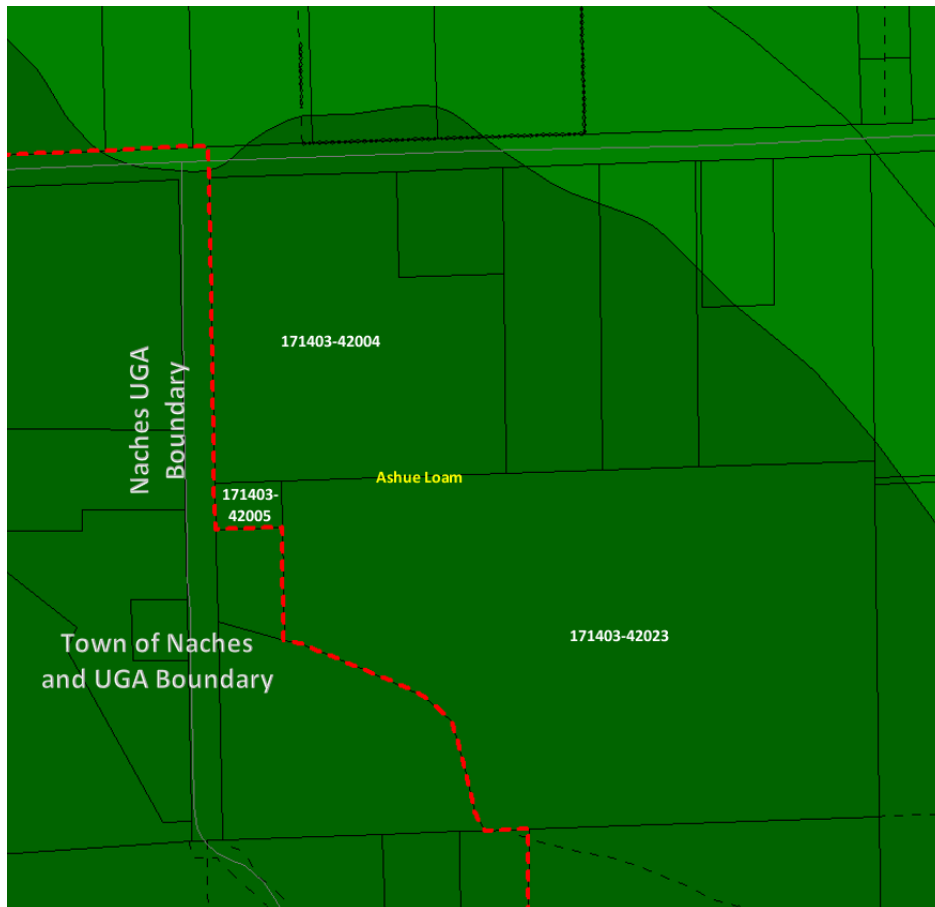
The analysis steps for this criterion in obtaining a soil scoring point for AG de-designation is as follows. The classification of soil types are first identified through the County's GIS soil layer for each subject parcel. Next, the soil is identified on Table 5 of the Soil Survey with the number of “non-irrigated” or “irrigated” apple bu/ac crop yields. GIS reported that these parcels are not in an irrigation district, however, assuming that these sites have had irrigation due to its historical agricultural use, the number of bu/ac for irrigated apple crop yield was used for a best case scenario. This number was then compared to the soil suitability scoring provided by this criterion. The table below shows the classification of soils, bu/ac, and points of each parcel for irrigated apples.

Parcel No. 171404-12404 (AG Zoning District)		
Soil Type	bu/ac crop yield	Points
Ashue loam	Irrigated Apples, 735 bu/ac	3 points
Cleman very fine sandy loam – 2 to 5 percent slopes	Irrigated Apples, 1000 bu/ac	4 points
Cleman very fine sandy loam – 5 to 8 percent slopes	Irrigated Apples, 950 bu/ac	4 points
Naches loam	Irrigated Apples, 770 bu/ac	3 points
Parcel No. 171404-12403 (AG Zoning District)		
Soil Type	bu/ac crop yield	Points
Cleman very fine sandy loam – 2 to 5 percent slopes	Irrigated Apples, 1000 bu/ac	4 points
Cleman very fine sandy loam – 5 to 8 percent slopes	Irrigated Apples, 950 bu/ac	4 points
Parcel Nos. 171404-12402 and 171404-12401 (AG Zoning District)		
Soil Type	bu/ac crop yield	Points
Ashue loam	Irrigated Apples, 735 bu/ac	3 points
Naches loam	Irrigated Apples, 770 bu/ac	3 points
Parcel Nos. 171403-42004, 171403-42005, and 171403-42023 (AG Zoning Districts)		
Soil Type	bu/ac crop yield	Points
Ashue loam	Irrigated Apples, 735 bu/ac	3 points

As reported by Yakima County GIS, Ashue loam, Cleman very fine sandy loam – 2 to 5 percent slopes, and Naches loam are considered “Prime Farmland if Irrigated.” Cleman very fine sandy loam – 5 to 8 percent slopes is considered “Farmland of Statewide Importance.” The soils on these parcels have all scored above average. Therefore, the soil classification, high potential yield, prime and statewide significance have “no” impacts to AG production, not in favor of de-designation.

Variable	Review Criteria	Impact to AG - Yes or No
1. Soil	Below Average crop yield per 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: All of the subject AG parcels are adjacent to the Naches UGA and all except parcel 171403-42004 are adjacent to the town limits. Based on the scoring, these parcels would result with 0 Points [lowest]. Under the AG de-designation criteria, an impact in favor of de-designation would result from below average scores (i.e. 1 point and less). Therefore, the "Impact to Ag" for these sites are a "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: All parcels except parcel 171403-42023 are in the below average and lowest point scoring categories. Parcel 171403-42023 is 15.34 acres in size and considered "average." Under the AG de-designation criteria, an impact in favor of de-designation for all parcels, except parcel 171403-42023, would result from below average scores (i.e. 1 point and less). Therefore, the "Impact to AG" for all of these sites are a "Yes" except parcel 171403-42023.

Parcel No(s)	Acres	Points
171404-12404	9.98	1
171404-12403	0.5	0
171404-12402	0.5	0
171404-12401	0.98	0
171403-42004	7.4	1
171403-42005	0.33	0
171403-42023	15.34	2

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

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.

Staff Analysis: At this time, the subject parcels are not serviced by public water or sewer service; however, all of the parcels are adjacent to the UGA where public water and sewer are within the 1000' of the sites. The Town of Naches and County roads are adjacent and paved. The availability of these public facilities indicates a "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.

Parcel No(s)	Tax Status
171404-12404	11 Household, Single Unit
171404-12403	11 Household, Single Unit
171404-12402	11 Household, Single Unit
171404-12401	11 Household, Single Unit
171403-42004	91 Undeveloped Land
171403-42005	11 Household, Single Unit
171403-42023	91 Undeveloped Land

Staff Analysis: None of the subject AG parcels are assessed as Agricultural. This indicates a "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 parcels are located adjacent to the Town of Naches. The parcels are approximately less than one mile from Naches Fire Station 16, library (Naches Library - Yakima Valley Libraries), Naches Valley School District, and within Yakima County Fire District #3 and Sheriff jurisdiction. The availability of public services presents a "Yes" impact 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 a mixed-use of adjacent small and large rural parcels with either existing residences or vacant, and in AG production that ranges from 1.18 to a 27.10 acres in size. The subject parcels are located directly adjacent to both the UGA boundary and Naches town limits where a 61 unit housing development is located and nearby General Commercial zoning district on a 21.09 acre parcel. This would indicate that both the current land use settlement patterns and intensity of land uses will increase and ultimately generate a "yes" impact to agriculture.

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 there has been more than 15 short subdivision permits within a half-mile radius of all subject parcels. Therefore, this indicates a "yes" impact to agriculture.

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

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 12 parcels adjacent to the subject AG parcels only two are in the "Current Use Agriculture" tax program, which equates to roughly 17% of the neighboring properties 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 a "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

11. 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 urban development, 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.

When using this basic analytical process for a county-wide or area-wide review, and 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.

Staff Analysis: This proposal is not a county-wide or area-wide proposal to de-designate agricultural lands. It is only intended to de-designate seven AG parcels, approximately 35.03 acres in size that are adjacent to the UGA and proposed for residential use.

As seen in the de-designation criteria summary below, a total of nine "Yeses," impacts to agriculture, have been obtained in favor of removing these parcels from AG land of long term commercial significance. Even though parcel 171403-42023 did not meet criterion 3: Predominant Parcel Size of "smaller than 10 acres," a total of 8 "Yeses" for this parcel were obtained and a determination can be made in favor of de-designating it from AG.

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	Yes (except 171403-42023)
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	Yes
10. Land Values under Alternative Uses	Assessed value indicates non-AG use	Yes
	Total	9

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 or town 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 Naches's 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.

Horizon 2040's provides the agricultural de-designation criteria to review when changing the Agricultural land use designation. Naches's proposed expansion area is zoned Agricultural and is adjacent to the existing UGA boundary. The town is requesting the inclusion of this property into the UGA for residential use.

Yakima County Planning Staff is recommending de-designation recognizing the need of the community, the overwhelming support of the criteria above in favor of de-designating the proposed AG subject parcels, and the location of the property in relation to urban facilities. This recommendation is based on the rationale listed above and within the Town of Naches UGA emergency amendment staff report. The Planning Commission will need to make their recommendation on this issue at their deliberations.

Attachment 8



29 E. SECOND STREET • P O BOX 95 • NACHES, WASHINGTON 98937-0095

March 3, 2021

Yakima County Public Services
Yakima County Courthouse
128 North Second Street
Yakima, WA. 98901

Attention: Tommy Carroll

RE: Emergency Request for Naches UGB

Tommy,

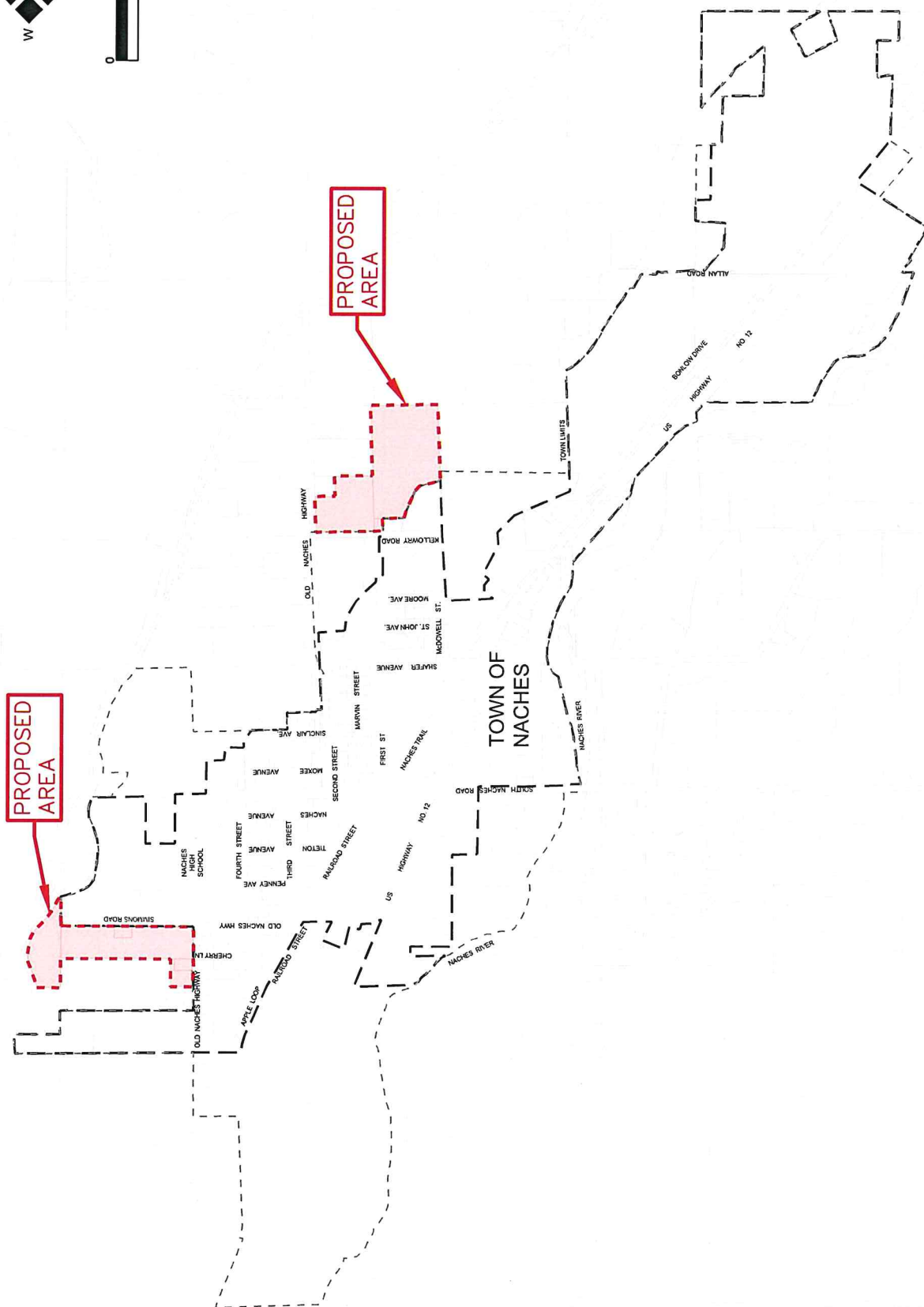
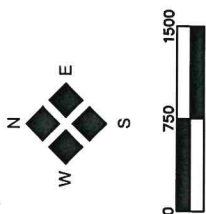
I'm writing to request that you meet with the Yakima County Commissioners and propose expediting the review process to consider urban growth area boundary (UGA boundary) revisions for the Town of Naches. Naches went through the urban growth area evaluation process in 2016, before the last Comprehensive Plan update, and was denied additional residential zoned property. At this time, Naches does not have any residential zoned developable properties available.

The Town of Naches is under current contract for \$1.5 million dollars to upgrade its wastewater treatment plant. Naches is working with USDA to fund a \$4.3 million dollar upgrade for the second phase of these improvements. Financially, to fulfill payment for such improvements, sewer service fees and hookups are an integral part of the equation. This also shows the commitment of the Town to have services available for this request.

Over the last several months, we have had several conversations about the UGA boundary and I appreciate your help. Attached are three maps illustrating the current UGA boundary and the two proposed areas we are requesting to add to the UGA boundary. The Town has received multiple inquiries about adding areas that may result in increasing residential development. Please pass this request along to the Yakima County Commissioners and support our desire to expedite the process. We believe that the Town has shown both a financial and a need component.

Respectfully,


Jeff Ranger
Administrator



TOWN OF NACHES

UGA BOUNDARY

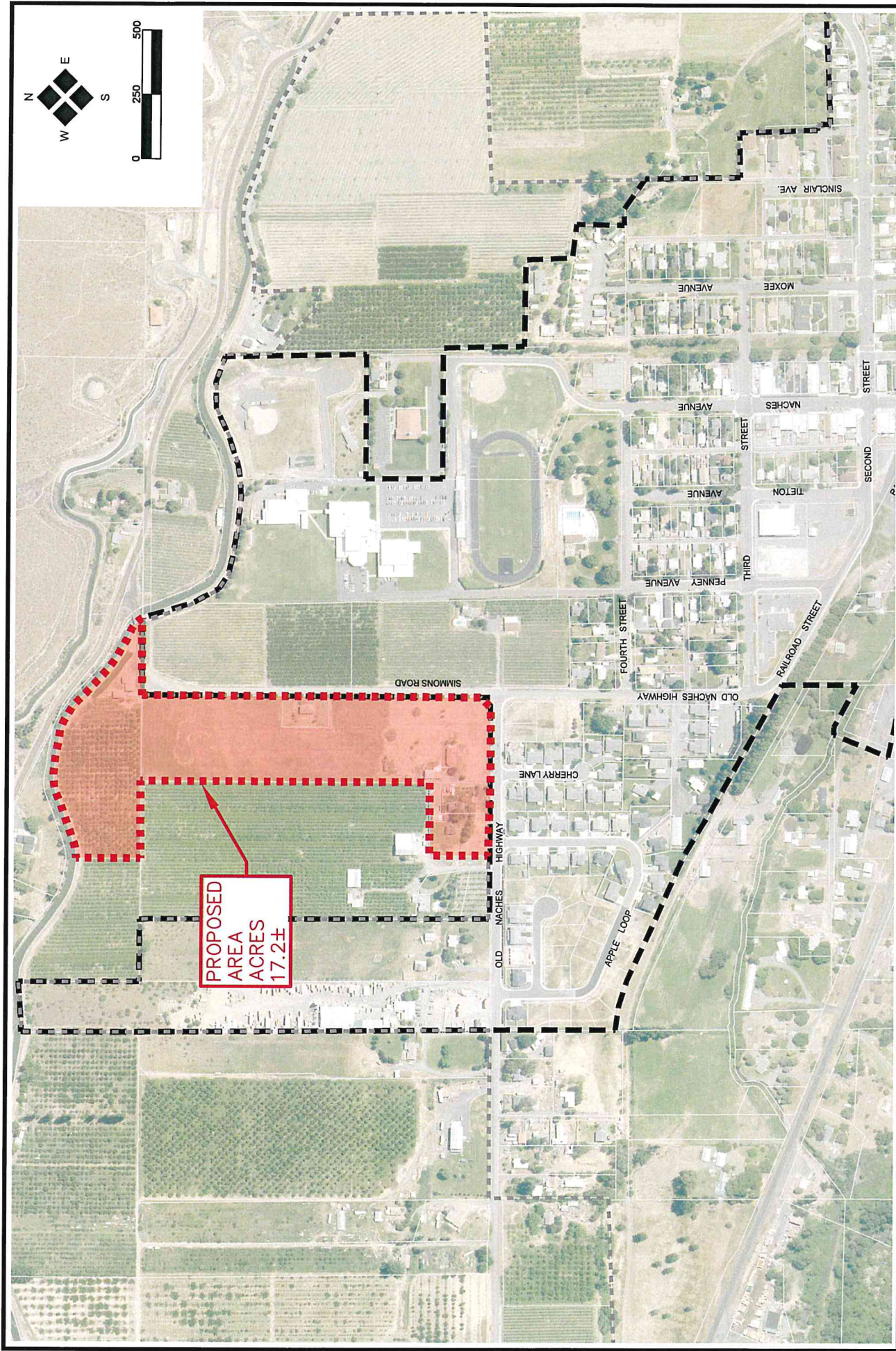
VICINITY MAP

JOB NUMBER:	DATE:
21001	3-3-21
FILE NAMES:	
DRAWING: UGA Exhibit.dwg	
DESIGNED BY:	DLL
ENTERED BY:	BFP



2803 River Road
Yakima, WA 98902
509.966.7000
Fax 509.965.3800
www.hlacivil.com





TOWN OF NACHES

UGA BOUNDARY

PROJECT MAP

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21001	3-3-21
FILE NAMES:	
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ENTERED BY:	BFP



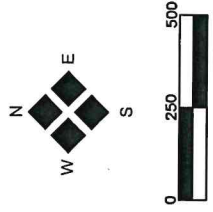
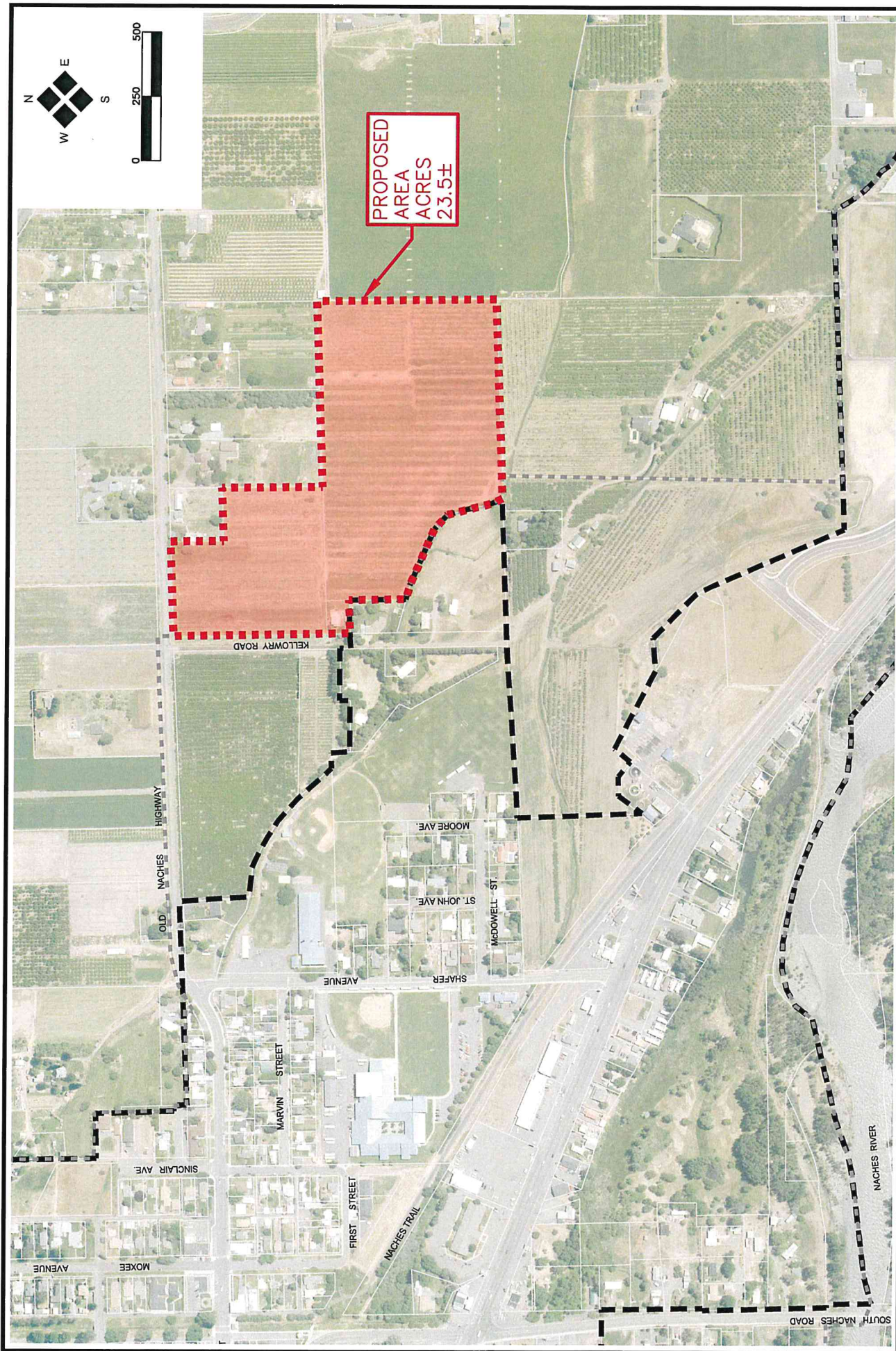
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HLA

Engineering and Land Surveying, Inc.

P:\Projects\2021\21001UGA Exhibit.dwg



PROPOSED
AREA
ACRES
23.5±

TOWN OF NACHES

UGA BOUNDARY PROJECT MAP

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21001	3-3-21
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