

**Yakima County
Public Services Department
Planning Division**

Yakima County's 2025 Review of its UGAs and Permitted Densities (as required by the Growth Management Act)

Urban Growth Area for **City of Union Gap**

Staff Report

October 22, 2025

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Introduction

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 [RCW 36.70A.130(5)(c)], its designated urban growth area or areas, patterns of development occurring within the 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 20-year period. ”

proceed to occur in the
[RCW 36.70A.130(3)]

*The GMA requires Yakima County and its cities to complete the UGA reviews and revisions by December 31, 2026.

This report 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. A draft was shared with the City of Union Gap to improve accuracy and foster a collaborative approach, and to assist Union Gap in meeting its responsibilities under these RCWs.

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1 **Review of Urban Growth Area (UGA): Land Capacity Analysis (LCA)**

2
3 A Land Capacity Analysis is an essential component in reviewing a UGA. An LCA is a quantitative
4 estimate of how much land a city will require as it grows over the succeeding 20-year period. It
5 begins with consultation between a county and its cities and towns to select a population growth
6 projection from a range of population growth projections provided by the state Office of Financial
7 Management (OFM). The population projection, together with a county employment growth forecast,
8 is then allocated primarily to UGAs, to assist in sizing UGAs to accommodate future urban growth.
9

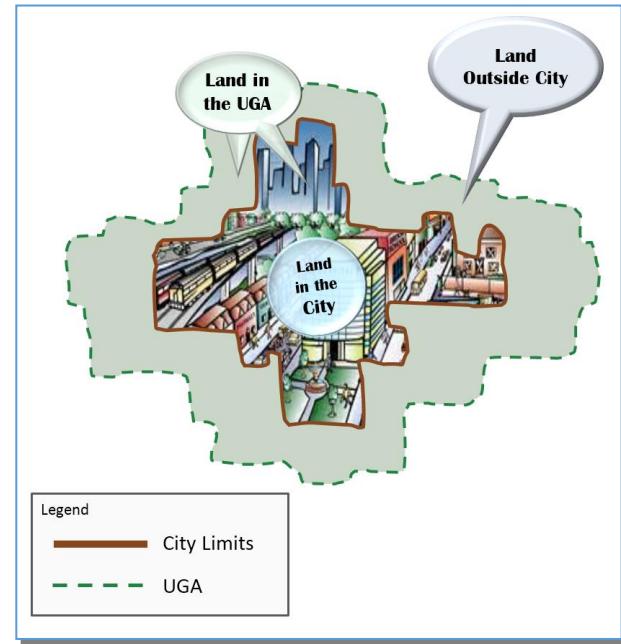
10 After reviewing OFM's most recent population projections for Yakima County, the Yakima County
11 Planning Division prepared a draft report entitled *Yakima County – Draft 2046 Population
12 Projections and Allocations* that allocated the projected population growth among the county's 14
13 cities.

14
15 The Planning Division shared the report with the County's cities on April 15, 2024, and met with
16 each city during the subsequent summer to review the report and get their comments on the draft
17 allocations.

18
19 Finally, staff reviewed all received comments and
20 issued a final report on April 8, 2025. This LCA
21 report reflects those final population allocations.

22
23 Three terms will be used throughout this analysis.
24 They will be used to describe potential growth as
25 follows:

- 26 1) **Land in city:** This is used to describe
27 lands within the city limit.
- 28 2) **Land outside city:** This is used to
29 describe the land in the UGA over which
30 the county has jurisdiction.
- 31 3) **Land in UGA:** This term refers to the
32 city's current area plus the areas the city
33 plans to annex and develop over a 20-year
34 period. The analysis combines terms 1
35 and 2 to determine its size.



36
37 The LCA quantifies the amount of land needed for Union Gap's growth according to the analytical
38 process outlined in the "Urban Lands" section in the Land Use Element of Yakima County's
39 Comprehensive Plan (***Horizon 2046***). The general inputs and calculations¹ are outlined below:
40

41 **Calculation of Net Acreage Available in the UGA for Future Growth:**

42
43 Acres needed for future residential
44 (plus) Acres needed for future commercial
45 (plus) Acres needed for future community facilities
46 (plus) Acres needed for future Streets

47
48 ¹ The spreadsheet in Attachment 1 provides expanded descriptions for assumptions and calculations. This section is explanatory
49 and provides a synopsis of the methods and inputs used for UGA and LCA analysis.

1 (plus) Acres needed for future industrial
2 **Subtotal:** the total acreage needed for UGA Growth
3
4 Acres of currently vacant residentially zoned land
5 (plus) Acres of currently vacant commercially zoned land
6 (plus) Acres of currently vacant community facilities land
7 (plus) Acres of currently vacant industrially zoned land
8 **Subtotal:** the vacant acreage available for growth within the current UGA
9

10 **Subtotal:** total acreage needed for UGA growth
11 **(minus) Subtotal:** the vacant acreage available for growth within the current UGA
12
13 **Total:** Net Acreage Available in the UGA for Future Growth.

14
15 **Quantity of land calculations for non-industrial uses**

16
17 Yakima County's Division of Geographic Information Services (GIS) calculated the current acreage
18 of developed residential, commercial, retail, and community facilities; and the acreage of current
19 vacant and partially vacant land in each zoning district to generate the figures in the "UGA Land
20 Capacity Analysis" spreadsheet (Attachment 1)

21
22 In summary, this analysis finds that Union Gap's UGA has enough vacant lands to accommodate its
23 non-industrial growth for 44 years. It has a surplus of 147 residentially zoned vacant acres, a deficit
24 of 27 commercially zoned vacant acres, and a surplus of 184 vacant acres of community facilities to
25 accommodate projected growth through 2046, as explained below:

26
27 1. **Population and Households Analysis:** Based on Union Gap's projected 2024-2046
28 population growth, this analysis estimates 538 additional households will be added to the
29 city's population by the year 2046.

30

2046 population forecast for City (City/County consensus)	8,290	people
2024 population in City (OFM's April 1 estimate)	6,660	people
Population change: 2024 – 2046	1,630	people
Average household size in City: 2020 ²	3.03	people
Future Households in the City 2024 – 2046	538	households

31
32 2. **Future Residential Land Need:** The acreage needed for future residential growth
33 through 2046 was calculated by assuming an average future density of 5.1 dwelling units
34 per acre (i.e., 8,500 sq. ft. for each household) and multiplying this by the number of
35 projected future households:

36

$$(8,500 \text{ sq. ft.} \times 538 \text{ households}) \div 43,560 \text{ households per acre} = \boxed{105 \text{ acres}}$$

37
38 3. **Future Commercial & Retail Land Need:** The acreage needed for future commercial
39 and retail growth through 2046 was calculated by multiplying the projected population
40 increase by the current per person acreage of developed commercial lands within the city.

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1,630 people x 0.0559 acres per person =	91 acres
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1
2 **4. Future Community Facilities Land Need:** The acreage needed for future community
3 facilities growth through 2046 was calculated by multiplying the projected population
4 increase by the current per person acreage of developed community facilities land within
5 the city:

1,630 people x 0.0456 acres per person =	74 acres
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7
8 **5. Future Streets Land Need:** The acreage needed for future rights-of-way to accommodate
9 streets and utilities through 2046 was calculated by multiplying the acreage needed for
10 future residential, commercial and retail, and community facilities by 15%:

Residential acreage needed	105 acres
(plus) Commercial/retail acreage needed	91 acres
(plus) Community facilities acreage needed	74 acres
Subtotal	270 acres
Equals: Total streets acreage needed (Subtotal x 0.15)	311 acres

12
13 **6. Land Capacity Analysis (LCA)³**

14
15 For this analysis, we compare the identified land needs to the amount of existing vacant land
16 to determine whether the city and the unincorporated UGA have sufficient capacity to
17 accommodate projected growth through 2046 or whether a land deficit remains.

18
19 The current acreage of vacant non-industrially zoned land is compared to the calculated
20 needs for future non-industrial land uses.

21 **a) Residentially zoned capacity calculation:**

Currently vacant residentially zoned land in the city	88 acres
(minus) needed residential acreage, including associated streets	121 acres
Subtotal: (Deficit) of vacant residentially zoned land within city	(33) acres
(plus) current vacant residentially zoned land outside the city	180 acres
Equals: Surplus of vacant residentially zoned land in the UGA	147 acres

23 **b) Commercially zoned capacity calculation:**

Currently vacant commercial and retail zoned land in city	78 acres
(minus) needed commercial and retail acreage, including associated streets	105 acres
Subtotal: (Deficit) of vacant commercially zoned land in city	(27) acres
(plus) current vacant commercially zoned land outside the city	0 acres
Equals: (Deficit) of vacant commercially zoned land in the UGA	(27) acres

25 **c) Community facilities capacity calculation:**

26
³ The spreadsheet in Attachment 1 provides the LCA steps and expanded descriptions for assumptions and calculations.

Current vacant community facilities land in city	263 acres
(minus) need community facility acreage, including associated streets	85 acres
Subtotal: Surplus of vacant community facilities in City	178 acres
(plus) current vacant community facilities land outside of the city	6 acres
Equals: Surplus of vacant community facilities land in UGA	184 acres

1 d) **Net capacity of non-industrially zoned UGA calculation (total of a-c above):**

Surplus of vacant residentially zoned land	147 acres
(plus) (Deficit) of vacant commercially zoned land	(27) acres
(plus) Surplus of land needed for future community facilities	184 acres
Equals: Surplus of vacant land in non-industrially zoned UGA	304 acres

3 e) **Years of growth in city (excluding industrial growth)**

Surplus of vacant land for residential, commercial, community facilities, and streets	118 acres
Equals: Years of growth available in City in 2024	30 years

5 f) **Years of growth outside city (excluding industrial growth)**

Equals: Years of growth available outside City in 2024	14 years
---	-----------------

7 g) **Years of growth in UGA (excluding industrial growth)**

Surplus of vacant land for residential, commercial, community facilities, & streets within UGA	304 acres
(computed) Market Choice Factor in UGA (MCF) ⁴	98%
Equals: Years of growth available in UGA in 2024	44 years

9 Years of growth for non-industrially zoned UGA calculation

10 To determine the years of growth available in the UGA for non-industrial zoned land, we first
 11 express the surplus (or deficit) of non-industrially zoned land MCF as a percentage. For
 12 example, as shown below, if a UGA has 125 vacant acres but only needs 100 acres for future
 13 growth, it has 25% more vacant land than required. This number 25% is the Market Choice
 14 Factor.

15
$$[(\text{acres currently vacant}) \div (\text{acres needed for future growth})] - 1.00 = \text{MCF\%}$$

 16 Inserting Union Gap's numbers (from the table below) in the formula provides the
 17 following percentage for Union Gap's MCF:

18
$$(615 \div 311) - 1 = 98\%$$

19 The MCF% is then utilized in the final calculations to result in the years of growth available in
 20 the UGA (see below). The County's 2046 UGA Update calculated the amount of vacant land

21
 22
 23
 24
 25 ⁴ MCF Use and Calculations Summary are found below under Conclusion of Above Tables

needed for the next 22 years of growth as Yakima County's land capacity analysis spans 2024 to 2046 (RCW 36.70A.130(b)).

MCF in Years = (98% + 1) x 22 = 44 years of growth

Total amount of vacant land needed in UGA for Future Non-industrial Uses. Adding the needed acres from the categories above calculates the total acreage below.

Acres needed for future residential uses (and associated streets)	121 acres
(plus) Acres needed for future commercial & retail uses (and associated streets)	105 acres
(plus) Acres needed for future community facilities (and associated streets)	85 acres
Equals: Total vacant acres needed for future non-industrial growth	<u>311 acres</u>
<u>Total amount of currently vacant Non-Industrially Zoned Land in UGA:</u> (vacant residential + vacant commercial/retail uses + vacant community)	615 acres

7. Future industrial land needs:

As outlined in the "Urban Lands" section of the Land Use Element, the city determines the amount of land needed for future industrial use "based on its economic development strategy rather than future population projections." The County's GIS analysis provides current acreages of industrially zoned lands:

Currently developed industrially zoned land in city	595 acres
Currently developed industrially zoned land outside city	0 acres
Currently vacant industrially zoned land in city	560 acres
Currently vacant industrially zoned land outside city	0 acres
Additionally vacant industrially zoned land need in city	0 acres
Additionally vacant industrially zoned land need outside city	0 acres

Review of Patterns of Development and Densities Permitted in the UGA

In addition to reviewing Union Gap's UGA as shown above, Yakima County must also review the densities permitted within both the incorporated and unincorporated portions of the UGA, and the patterns of development occurring within the UGA, as required by RCW 36.70A.130(3)(a). Recent developments within the city limits include a multi-family project in the northern central portion of the city.

The City of Union Gap includes twelve zoning districts within its limits: Single-Family 1 Residential (R-1), Single-Family 2 Residential (R-2), Multi-family Residential (R-3), Corridor Multi-Family Residential (R-4), Commercial (C-1), Regional Commercial (C-2), CBD Business (CBD), Wholesale/warehouse (WW), Light Industrial (L-I), Public Building (PBD), Planned Recreational (PrC), Parks/Open Space (PkO).

Yakima County applies two of its zoning districts to the lands in the unincorporated area: Suburban Residential (SR) and Single-Family Residential (R-1).

The densities permitted in the residential zones are analyzed below:

City of Union Gap Zoning (Title 17 Zoning)		
Zoning District	Minimum Lot Size	Density
R-1	7,000 sq. ft. lot for single-family dwelling 8,500 sq. ft. lot for two-family dwelling	5 dwelling units per acre 5 dwelling units per acre
R-2	6,000 sq. ft. lot for single-family dwelling 7,500 sq. ft. lot for two-family dwelling N/A for multi-family dwelling	7 dwelling units per acre 7 dwelling units per acre 5-7 dwelling units per acre
R-3	5,000 sq. ft. 5,000 sq. ft. N/A for multi-family dwelling	8 dwelling units per acre 8 dwelling units per acre 20 dwelling units per acre
R-4	5,000 sq. ft. 5,000 sq. ft. N/A for multi-family dwelling	8 dwelling units per acre 8 dwelling units per acre 20 dwelling units per acre
Yakima County Zoning in the Urban Growth Area (Yakima County Code Title 19)		
Zoning District	Minimum Lot Size	Density
SR	4,000 – 10,000 sq. ft. (depending on use) 7,000 sq. ft. for single family residence	7 dwelling units per acre
R-1	4,000 – 10,000 sq. ft. (depending on use) 7,000 sq. ft. lot for single family residence	7 dwelling units per acre

1
2 **Conclusions of Above Tables**

3
4 Portions of the City of Union Gap and the unincorporated UGA are within FEMA mapped
5 floodplains. This affects subdivision potential for residential lots within these areas. An impactful
6 development standard for subdividing within the floodplain is that new lots within the floodplain
7 must be a minimum of one acre (YCC 16C.3.27(3)(b)(iv)). To accommodate this, the total number of
8 residential acres within the floodplain was divided by 5.1 (the same number used to calculate the
9 amount of residential acreage needed for future growth). The number derived from this calculation
10 was then added to the total vacant residential designated land. This process accurately factors in
11 residential land within the floodplain.

12
13 Within the city limits, Union Gap has 87 vacant residential acres outside the floodplain and 6 vacant
14 residential acres located within the floodplain, totaling 88 vacant residential acres (based on utilizing
15 the formula in the paragraph above). If developed with single-family residences at five dwelling units
16 per net residential acre, the area could accommodate 440 new homes. Developing any property to the
17 allowable multi-family densities increases the capacity for new dwelling units within city limits.

18
19 The unincorporated portion of Union Gap's UGA has 166 vacant residential acres outside the
20 floodplain and 70 vacant residential acres within the floodplain, totaling 180 vacant residential acres
21 (based on utilizing the formula two paragraphs above). Utilizing a density of 5.1 dwelling units per
22 acre, the same density that calculates additional residential acreage needed for development, the
23 unincorporated UGA could accommodate 918 dwelling units.

24
25 Based on these density standards, the existing vacant residential lands within Union Gap's UGA have
26 more than adequate capacity to accommodate the 538 additional dwelling units identified in the
27 analysis for future growth.

1 **Further Staff Findings on Union Gap's UGA**

2

3 The quantitative results denote that the UGA for Union Gap is lacking twenty-seven acres of
4 commercially zoned property required to meet commercial growth for the next 22 years. Of the 269
5 vacant acres within the community facility designation, approximately 198 acres are privately
6 owned, and of those 198 acres, roughly 160 acres were designated as developable due to
7 environmental constraints stemming from Ahtanum Creek. All of the referenced land is adjacent to a
8 beltway that is under construction. Once completed, the entire area along the beltway may contain
9 places more suitable for commercial use, addressing the deficit. However, it is key that enough land
10 is kept or developed as community facilities to accommodate the requisite 85 acres of community
11 facility land needed within the next 22 years.

12

13 **Proposed Revised Plan Designations Within the Unincorporated UGA**

14

15 Attachments 5, 7, and 8 depict changes in the urban future land use designations and zoning that the
16 county planning staff, in collaboration with Union Gap's personnel and its comprehensive plan,
17 proposes for the UGA of Union Gap.

18

19 **City/County Collaboration**

20

21 County staff met with Union Gap representatives on June 26, 2024, to review the County's draft
22 population projections, preview the land capacity analysis, discuss proposed future land use
23 designations, evaluate permitted densities, and address Union Gap's planning issues.

24

25 County staff met with Union Gap representative again on August 14, 2025, to discuss the preliminary
26 results of the land capacity analysis. The discussion began with a focus on the eastern side of the
27 UGA to resolve discrepancies between the City of Union Gap and the East Valley Fire District
28 regarding their service areas. To resolve the issue, the City plans to annex the eastern portion of the
29 unincorporated UGA within the Yakima River and along Highway 82. The conversation shifted to an
30 analysis of how residential property within the floodplain is calculated and what that means for
31 where future growth can occur. Some 'ground truthing' was done on the zone groups and the
32 development of select properties to reflect recently issued building permits. The conversation
33 concluded with discussions on areas that may not be serviced by water and sewer due to
34 environmental constraints and whether those properties should be taken out of the UGA (see Major
35 Rezone and Plan Amendment Review Criteria below).

36

37 **Major Rezone and Plan Amendment Review Criteria**

38

39 Amendments to the zoning map that are contingent upon legislative approval of a comprehensive
40 plan amendment are deemed to be legislative and shall be considered major rezones that are subject
41 to the procedures outlined in YCC Chapter [16B.10](#).

42

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

45

46 *(a) The proposed amendment is consistent with the Growth Management Act and
47 requirements, the Yakima County Comprehensive Plan, the Yakima Urban Area
48 Comprehensive Plan and applicable sub-area plans, applicable city comprehensive
49 plans, applicable capital facilities plans and official population growth forecasts and
50 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:

Area One: Staff propose removing Parcels 181212-33405, 181212-33406, 181212-34405, 181212-34402, 181212-33408, 181212-33407, 181212-34406, and 181212-34403 (Area One and as seen in Attachments 5, 7, and 8) from the City of Union Gap's unincorporated UGA. Staff proposes removing Area One from the Urban Residential Designation and the Single-Family (R-1) Zoning District and placing Area One within the Rural Self-Sufficient (RSS) Designation and Rural – 10/5 (R-10/5) Zoning District. **1(f)** Based on current mapping information from Yaima County GIS, Union Gap's closest water line is approximately two road miles away, and sewer lines are about two and a quarter road miles away (providing improvements to those lines is not needed). Currently, there are no municipally driven efforts to provide the southwestern portion of Union Gap's UGA with municipal water and sewer within the current planning period.

1(a-d) The lots within Area One have access via a private easement to the hard-surfaced, County-maintained Meadowbrook Road. The properties are within five road miles of a year-round operating fire station (within Union Gap) and within Fire District 11. These are the subdivision criteria for the R-10/5 Zoning District (see YCC19.11.030) to allow for one dwelling unit for every five acres. If placed within the R-10 Zoning District, six of the eight lots remain eligible for subdivision, potentially creating six new lots within Area One. That

would lead to fourteen potential lots being within Area One if all eligible lots were subdivided to the maximum extent possible. The two lots not eligible for subdivision are Parcels 181212-33408 and -33407 because they are under 10 acres, and therefore, cannot meet the lot density requirements for new lots within the R-10/5 Zoning District.

Subdivisions are not the only potential development within the R-10/5 Zoning District. The Allowable Land-Use Table within YCC19.14 details all the permissible uses within the R-10/5 Zoning District. Some land-uses have specific development standards that may make a project infeasible, and the slopes within Area One may make other uses more difficult to develop. The Yakima County Planning Division cannot guarantee pre-approval on any applications. If an application is submitted for a subdivision or other land-use permit, the proposal will be conditioned accordingly to require all public infrastructure (such as roads and community wells) to be installed before finalization and require an applicant to address the environmental attributes of Area One as stipulated by Yakima County codes.

The RSS Designation provides for a “broad choice of areas within rural Yakima County where an independent and private lifestyle can be sustained on acreage homesites.”⁵ To achieve this Comprehensive Plan goal, the policies for the RSS Designation⁶ and development standards of the R-10/5 Zoning District encourage individual wells and septic systems to be located on the lots. A clustering subdivision within the R-10/5 Zoning District is an option. A cluster subdivision within the R-10/5 Zoning District allows for lots to be between one and three acres, while maintaining the one dwelling unit for every five-acre density. Individual wells, providing that the well can be converted into a community well in the future, are possible for cluster divisions within the R-10/5 Zoning District (YCC19.25.040(2)(d)(ii)). If all buildable lots are clustered within a subdivision, then the remaining lot must be reserved in open space (see Table 19.34.035-1 within YCC19.34.035).

The lots within Area One are covered by oversteepened slopes of intermediate and high risk. Yakima County code classifies oversteeped slopes as geological hazards with the following definition: “areas with slopes steep enough to create potential problems. High risk areas (OS3) have a high potential to fail, and include slopes greater than 40%, and consist of areas of rock fall, creep, and places underlain with unstable materials. Intermediate Risk areas (OS2) are less likely to fail but are still potentially hazardous. This category also includes some slopes between 15 and 40%. Low Risk areas, unlikely to fail, are unlabeled and combined with other Low Risk categories” (YCC16C.08.02(3)(b)). Any new lots within classified oversteepened slopes will need to meet the critical area requirements in YCC16C.03.27(3), which favor larger, acreage homesites as opposed to the ¼ acre lot currently viable based on the R-1 Zoning District. Due to the presence of these geological hazards on current GIS maps, an environmental site visit is required before a formal land-use/environmental application is submitted (YCC16C.03.02). The purpose of the environmental site visit is to determine what additional reports and environmental permitting are necessary. If the Planning Division determines that additional reports (for example, a geotechnical report) are not needed, it does not preclude the Building & Fire Safety Division from requiring reports as stipulated by the codes the division follows.

⁵ All quotations in this staff finding are taken from pages 43-46 of the current Land-Use Element of **Horizon 2040**.

⁶ See Goal LU-R 10 and the subsequent policies on page 83 of the current Land-Use Element of **Horizon 2040**.

1 A key component of this analysis is determining the suitability of Area One for urban-level
2 development and urban-level development standards. Taking this approach, it is appropriate
3 to remove Area One from the UGA and the Urban Residential Designation. Nearby, there are
4 large, flat, residentially zoned lands that are more plausible for urban development within the
5 planning period (see Parcels 181212-32404, -32428, and -42004). Prioritizing urban
6 development and growth over flat areas, areas closer to existing lines, and areas closer to city
7 limits where urban growth exists and is expected is appropriate (RCW36.70A.110(2)). Area
8 One is currently within the R-1 Zoning District. As municipal and regional water and sewer
9 systems are not available and all lots within Area One exceed five acres, the prime
10 subdivision option currently available is the cluster division per the standards of the R-1
11 Zoning District (YCC19.34.035(2)(d)). Clustering within the R-1 Zoning District requires
12 community wells, community on-site septic systems, and maintaining a density of four to
13 seven units per acre, making the minimum lot size 10,890 (or a ¼ of an acre) (reference
14 Table 19.34.035-1). Due to the steep slopes within Area One, establishing a four to seven-
15 unit density per acre causes a hindrance to development. As municipal and regional water
16 and sewer lines are not available, the lowest density of residential development, single-family
17 residences, at the cluster density allowed within the R-1 Zoning District is difficult due to the
18 oversteepened slopes on the property. This does not align with the low-density development
19 intention of the Urban Residential Designation, and the higher-density options are further
20 incompatible.⁷ Therefore, removing Area One from the Urban Residential Designation and
21 placing Area One into a rural land-use designation that allows for development and
22 subdivisions focusing on larger lot sizes (such as acreage homesites) is appropriate.
23

24 Partially based on these items, Area One is not suited for the Rural Transitional Designation
25 or the Rural Transitional (RT) Zoning District. The Rural Transitional Designation is
26 intended for areas where municipal-level services “necessary for development at urban
27 densities are currently not available, but may become available in the future.” The extension
28 of urban governmental services to Area One is not anticipated within the planning period for
29 this UGA update. The intention of the Rural Transitional Designation is for areas with “lot
30 sizes [that] vary (0.5 acres up to 10 acres) with an average considerably less than five acres.”
31 The average lot size of Area One is 10.08 acres. Additionally, the RT Zoning District
32 development standards emphasize community infrastructure due to the anticipation of the
33 area being the next portion brought into an UGA and being annexed by a city. Community
34 wells of some level are required for all subdivisions within the RT Zoning District (Table
35 19.25-1 within YCC19.25.080). It makes sense to concentrate urban-level densities within
36 the current central core of Union Gap and the areas already characterized with urban
37 development, like the areas closer to Union Gap city limits.
38

39 **I(g)**The changes to the zoning and designation of Area One are not expected to require other
40 designation or zoning changes within the vicinity. The reasoning for the adjacent properties
41 within the UGA is that they are more suitable for urban-level density of development due to
42 their flat topography, proximity to existing lines, smaller lot sizes, and lower financial costs
43 to extend urban governmental services. The reasoning for the adjacent properties outside of
44 the UGA (to the west) is that they are designated as agricultural resource lands of long-term
45 significance. Per WAC365-190-050(1), designated agricultural resource lands of long-term
46 significance cannot be removed from that designation without a countywide analysis. There

⁷ See the Urban Residential Purpose statement on page 23 of the current Land-Use Element of **Horizon 2040**.

1 would be a substantive effort across the county if those properties' land-use designations
2 were under review for potential changes.
3

4 This analysis does not imply that lots within Area One are undevelopable. All applications
5 for permissible land-uses within the R-1 Zoning District and all subdivision applications are
6 evaluated against the applicable Yakima County codes. The intent is to focus on the level of
7 development most suitable within Area One based on the current factors of the built and
8 natural environments, and the growth capacity of Union Gap's UGA. **1(a)**The proposal is in
9 line with the applicable statutes of the GMA and, for the reasons outlined above, with the
10 Yakima County comprehensive plan.
11

12 **Area Two:** Staff propose removing Area Two from the unincorporated UGA of Union Gap.
13 The property within Area Two has been placed into trust land, which is why a parcel number
14 is not associated with the area. As the area is now in trust lands, there are no zoning or
15 designations to apply to the property that detail development goals or standards because
16 Yakima County lacks land-use jurisdiction on trust lands.
17

18 A recent change in state law (see RCW36.70A.830) allows cities to extend urban
19 governmental services beyond city limits and urban growth area boundaries to tribally
20 controlled property, providing the tribal property abuts city limits. Area Two is now part of a
21 larger area of tribal trust property that abuts the city limits of Union Gap. The RCW does
22 require an agreement between the City of Union Gap and the Yakama Nation to be in place
23 by December 31, 2028.
24

25 As Yakima County lacks land-use jurisdiction on tribal trust lands, the other criteria are
26 difficult to address. The legislature did state in HB 1039 (of 2025), making the change, that
27 they are providing a "statement of the authority for a city and tribal government to mutually
28 agree to contract for urban governmental services beyond the urban growth boundary of the
29 city to tribal lands with urban development and be in compliance with the provisions of the
30 growth management act." Therefore, any extension of urban governmental services to Area
31 Two is in line with the GMA.
32

33 (2) *The following criteria shall be considered in any review and approval of changes to Urban
34 Growth Area (UGA) boundaries:*

35 (a) *Land Supply:*

36 (i) *The amount of buildable land suitable for residential and local commercial
37 development within the incorporated and the unincorporated portions of the
38 Urban Growth Areas will accommodate the adopted population allocation
39 and density targets;*

40 (ii) *The amount of buildable land suitable for purposes other than residential and
41 local commercial development within the incorporated and the
42 unincorporated portions of the Urban Growth Areas will accommodate the
43 adopted forecasted urban development density targets within the succeeding
44 twenty-year period;*

45 (iii) *The Planning Division will use the definition of buildable land in YCC
46 [16B.02.045](#), the criteria established in RCW [36.70A.110](#) and .130 and
47 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 designation criteria set forth in the comprehensive plan.

Findings:

Area One: Due to the factors relating to the steep slopes within Area One discussed within *Finding 1* of this subsection, Area One was placed within the environmentally constrained zone group, thus taking out all Area One properties from Union Gap's LCA calculations. Therefore, the removal of Area One does not increase or decrease the development capacity of Union Gap's UGA. The City of Union Gap's UGA can accommodate growth for the next 44 years with the current vacant residential, commercial, and community facilities lands. As described in 'Further Staff Findings on Union Gap's UGA,' once a beltway connector is constructed, within the incorporated UGA, that area should see an increase in development, accommodating the deficit in commercial land. This is in addition to the vacant industrially zoned land within Union Gap's UGA (560 acres). Urban governmental service criteria are discussed in *Finding 1* above.

Area Two: As Area Two is in tribal trust lands, the land is not factored into the LCA calculations. Therefore, the removal of the property does not increase or decrease the growth capacity of Union Gap's UGA.

(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: This criterion is addressed in *Finding 1* of this subsection above.

(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 cumulative impacts of the proposed amendment, along with those of previously approved plan amendments since the original adoption of the Comprehensive Plan, will be evaluated to ensure consistency with countywide planning goals and to avoid adverse impacts on land supply, public services, and infrastructure capacity. The cumulative impacts will be addressed in the Planning Commission's findings. A table showing the cumulative impacts of all proposed amendments being considered in 2025 will also be provided as part of the SEPA analysis.

(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.

1 Findings: Not applicable. The changes to Union Gap's UGA are map amendments rather than
2 policy or text amendments.
3

4 **Conclusion:**

5

6 1. The County's LCA for Union Gap calculates a surplus of 147 acres of vacant residentially zoned
7 land, a deficit of 27 acres of vacant commercially zoned land, and a surplus of 184 acres of
8 vacant land for community facilities and all associated streets within the current UGA for all non-
9 industrial uses through 2046. Overall, this is a surplus of 304 acres over what is needed, which
10 can accommodate Union Gap's growth for the next 44 years (from 2024).
11

12 2. This Land Capacity Analysis finds that Union Gap's current city limits would accommodate the
13 City's growth for 30 years (from 2024) and that the UGA could accommodate the City's growth
14 for 44 years (from 2024). Because the GMA requires the UGA to accommodate growth for only
15 22 years (i.e., from 2024 to 2046), the UGA should not be expanded but could be reduced in size.
16

17 **Recommendation:**

18

19 1. County Planning staff recommend removing Areas One and Two from the City of Union Gap's
20 UGA at this time.
21

22 2. County Planning staff recommends the approval of the comprehensive plan designations and
23 zoning districts as depicted in Attachments 5, 7, and 8.
24

25 **Attachments:**

26

27 1. UGA LCA (spreadsheet)
28 2. County's population projection for city
29 3. **Horizon 2040**'s description of the analytical process for the UGA LCA
30 4. Union Gap UGA Current Zoning
31 5. Union Gap UGA Proposed Zoning
32 6. Union Gap UGA Current Land-Use Designations
33 7. Union Gap UGA Recommended Changes Land-Use Designations
34 8. Union Gap UGA Recommended Changes

"UGA Land Capacity Analysis"
 Yakima County Department of Public Services - Planning Division
 October 2025 Staff Report

A	B	C	Q
		Units	Union Gap
29			
30	1 - Population and Households Analysis		
31 a	2046 population for City (County's preferred alternative medium projection)	people	8,290
32 b	2024 population in City (OFM's April 1 estimate)	people	6,660
33 c	City's projected population increase, 2024-46 (a - b)	people	1,630
34 d	City's average household size (2020 Census - 5 Year Estimates) Table S1101	people per household	3.03
35 e	Additional households projected for City, 2024-46 (c + d)	households	538
36			
37	2 - Future Residential Land Need		
38 f	Desired average density of future housing, 2024-46 (5.1 dwelling units per acre)	sq. ft. per dwelling unit	8,500
39 g	Land needed for future housing, 2024-2046 (e • f + 43,560 sq. ft. per acre)	acres	105
40			
41	3 - Future Commercial & Retail Land Need		
42 h	Current developed commercial & retail land in City (from GIS analysis)	acres	372
43 i	Current developed commercial & retail land in City per person (h ÷ b)	acres per person	0.0559
44 j	Land needed for future commercial & retail, 2024-46 (i • c)	acres	91
45			
46	4 - Future Community Facilities* Land Need		
47 k	Current developed community facilities land in City (from GIS analysis)	acres	304
48 m	Current developed community facilities land in City per person (k ÷ b)	acres per person	0.0456
49 n	Land needed for future community facilities, 2024-46 (m • c)	acres	74
50			
51	5 - Future Streets Land Need		
52 p	Subtotal of land needed for future residential, commercial & retail, and community facilities 2024-46 (g + j + n)	acres	270
53 q	Land needed for future streets (p • 15%)	acres	41
54			
55	6 - Land Capacity Analysis		
56	Residentially-zoned capacity		
57 r	Current vacant residentially-zoned land in City, excluding floodplains (from GIS analysis)	acres	87
58 s	(plus) Current vacant residentially-zoned land in City, only including floodplains (from GIS analysis)	acres	6
59 t	= Current vacant residentially-zoned land in City (r + (s/5.1))	acres	88
60 u	(minus) Land needed for future housing and associated streets, 2024-46 (-g • 115%)	acres	(121)
61 v	= Surplus (Deficit) of vacant residentially-zoned land in City (t + u)	acres	(33)
62 w	Current vacant residentially-zoned land outside City, excluding floodplains (from GIS analysis)	acres	166
63 x	(plus) Current vacant residentially-zoned land outside City, only in floodplains (from GIS analysis)	acres	70
64 y	= Current vacant residentially-zoned land outside City (w + (x/5.1))	acres	180
65 z	(plus) Surplus (Deficit) of vacant residentially-zoned land in City (v)	acres	(33)
66 aa	= Surplus (Deficit) of vacant residentially-zoned land in UGA in 2046 (y + z)	acres	147
67			
68	Commercially-zoned capacity		
69 bb	Current vacant commercially-zoned land in City (from GIS analysis)	acres	78
70 cc	(minus) Land needed for future commercial & retail and associated streets, 2024-46 (-j • 115%)	acres	(105)
71 dd	= Surplus (Deficit) of vacant commercially-zoned land in City (bb + cc)	acres	(27)
72 ee	Current vacant commercially-zoned land outside City (from GIS analysis)	acres	0
73 ff	(plus) Surplus (Deficit) of vacant commercially-zoned land in City in 2046 (dd)	acres	(27)
74 gg	= Surplus (Deficit) of vacant commercially-zoned land in UGA in 2046 (ee + ff)	acres	(27)
75			
76	Community Facilities capacity		
77 hh	Current vacant community facilities land in City (from GIS analysis)	acres	263
78 ii	(minus) Land needed for future community facilities and associated streets, 2024-46 (-n • 115%)	acres	(85)
79 jj	= Surplus (Deficit) of vacant community facilities in City (hh + ii)	acres	178
80 kk	Current vacant community facilities land outside City (from GIS analysis)	acres	6
81 mm	(plus) Surplus (Deficit) of vacant community facilities land in City in 2046 (jj)	acres	178
82 nn	= Surplus (Deficit) of vacant community facilities land in UGA in 2046 (kk + mm)	acres	184
83			
84	Capacity for growth in City (excluding Industrial growth)		
85 pp	Surplus (Deficit) of vacant land for residential, commercial, community facilities, & streets (v + dd + jj)	acres	118
86 qq	Computed Market Choice Factor in City (MCF)**	%	38%
87 rr	Years of growth available in City in 2024 ((qq + 1) • 22)	years	30
88			
89	Capacity for growth outside City (excluding Industrial growth)		
90 ss	Years of growth available outside City in 2024 (vv - rr)	years	14
91			
92	Capacity for growth in UGA (excluding Industrial growth)		
93 tt	Surplus (Deficit) of vacant land for residential, commercial, community facilities, & streets (aa + gg + nn)	acres	304
94 uu	Computed Market Choice Factor in UGA (MCF)***	%	98%
95 vv	Years of growth available in UGA in 2024 ((rr + 1) • 22)	years	44
96			
97	7 - Future Industrial Land Need		
98 ww	Current developed industrially-zoned land in City (from GIS analysis)	acres	595
99 xx	Current developed industrially-zoned land outside City (from GIS analysis)	acres	0
100 yy	Current vacant industrially-zoned land in City (from GIS analysis)	acres	560
101 zz	Current vacant industrially-zoned land outside City (from GIS analysis)	acres	0
102 aaa	Industrial acres to add to UGA (based on City's economic development strategy) (from GIS analysis)	acres	0
103 bbb	Industrial acres to remove from UGA (based on City's economic development strategy) (from GIS analysis)	acres	0

2046 Population Projections and Allocations • Final Report April 4, 2025

Table 8. Cities, Towns, & County Consensus Population Projections and Allocations, 2025-2046

	2020 Census	Cities, Towns, & County Consensus Annual Growth Rates (2025-2046) ⁴	2021 OFM April 1 Estimate	2022 OFM April 1 Estimate	2023 OFM April 1 Estimate	2024 OFM April 1 Estimate	2025	2026	2027	2028	2029	2030	2031	2032
Yakima County (Preferred Alt.)	256,728	0.56%	258,100	259,950	261,200	263,200	264,662	266,133	267,611	269,098	270,593	272,097	273,608	275,129
Unincorporated	88,147		88,240	88,955	89,155	89,635	89,742	89,840	89,931	90,013	90,087	90,153	90,209	90,257
Incorporated	168,581		169,860	170,995	172,045	173,565	174,921	176,293	177,680	179,085	180,506	181,944	183,399	184,872
Grandview	10,910	1.00%	10,960	11,020	11,250	11,680	11,797	11,915	12,034	12,154	12,276	12,399	12,523	12,648
Granger	3,624	1.21%	3,690	3,740	3,775	3,815	3,861	3,908	3,956	4,004	4,052	4,101	4,151	4,202
Harrah	585	0.25%	580	580	585	585	586	588	589	591	592	594	595	597
Mabton	1,959	-1.21%	1,975	1,975	1,965	1,965	1,941	1,918	1,895	1,872	1,849	1,827	1,805	1,783
Moxee	4,325	2.92%	4,405	4,665	4,785	4,820	4,961	5,105	5,254	5,408	5,566	5,728	5,895	6,067
Naches	1,084	1.98%	1,110	1,125	1,120	1,125	1,147	1,170	1,193	1,217	1,241	1,265	1,290	1,316
Selah	8,153	1.75%	8,235	8,365	8,450	8,620	8,771	8,924	9,081	9,239	9,401	9,566	9,733	9,903
Sunnyside	16,375	0.80%	16,400	16,500	16,530	16,570	16,703	16,836	16,971	17,107	17,243	17,381	17,520	17,661
Tieton	1,389	2.50%	1,430	1,505	1,545	1,600	1,640	1,681	1,723	1,766	1,810	1,856	1,902	1,949
Toppenish	8,854	0.17%	8,870	8,870	8,900	8,915	8,930	8,945	8,961	8,976	8,991	9,006	9,022	9,037
Union Gap	6,568	1.00%	6,595	6,640	6,660	6,660	6,727	6,794	6,862	6,930	7,000	7,070	7,140	7,212
Wapato	4,607	0.25%	4,610	4,615	4,620	4,625	4,637	4,648	4,660	4,671	4,683	4,695	4,707	4,718
Yakima	96,968	0.62%	97,810	98,200	98,650	99,370	99,985	100,604	101,227	101,853	102,484	103,118	103,756	104,398
Zillah	3,179	0.63%	3,190	3,195	3,215	3,235	3,256	3,276	3,297	3,318	3,339	3,360	3,381	

⁴ These annual growth rates are applied to the 2024 population figures and to each subsequent year.

Table 8 (cont.). Cities, Towns, & County Consensus Population Projections and Allocations, 2025-2046

	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046
Yakima County (Preferred Alt.)	276,657	278,194	279,740	281,294	282,857	284,428	286,009	287,598	289,196	290,802	292,418	294,043	295,676	297,319
Unincorporated	90,295	90,323	90,341	90,350	90,348	90,335	90,311	90,276	90,229	90,171	90,100	90,017	89,921	89,812
Incorporated	186,363	187,871	189,398	190,944	192,509	194,094	195,698	197,322	198,966	200,632	202,318	204,026	205,756	207,508
Grandview	12,774	12,902	13,031	13,161	13,293	13,426	13,560	13,696	13,833	13,971	14,111	14,252	14,394	14,538
Granger	4,253	4,304	4,356	4,409	4,463	4,517	4,572	4,627	4,684	4,740	4,798	4,856	4,915	4,975
Harrah	598	600	601	603	604	606	607	609	610	612	613	615	616	618
Mabton	1,761	1,740	1,719	1,698	1,678	1,657	1,637	1,618	1,598	1,579	1,560	1,541	1,522	1,504
Moxee	6,244	6,426	6,614	6,807	7,006	7,210	7,420	7,637	7,860	8,089	8,325	8,568	8,818	9,076
Naches	1,342	1,369	1,396	1,423	1,452	1,480	1,510	1,540	1,570	1,601	1,633	1,665	1,698	1,732
Selah	10,077	10,253	10,432	10,615	10,801	10,990	11,182	11,378	11,577	11,779	11,986	12,195	12,409	12,626
Sunnyside	17,802	17,944	18,088	18,233	18,378	18,526	18,674	18,823	18,974	19,125	19,278	19,433	19,588	19,745
Tieton	1,998	2,048	2,099	2,152	2,206	2,261	2,317	2,375	2,435	2,495	2,558	2,622	2,687	2,755
Toppenish	9,052	9,068	9,083	9,099	9,114	9,130	9,145	9,161	9,176	9,192	9,207	9,223	9,239	9,254
Union Gap	7,284	7,357	7,430	7,505	7,580	7,655	7,732	7,809	7,887	7,966	8,046	8,126	8,208	8,290
Wapato	4,730	4,742	4,754	4,766	4,778	4,790	4,802	4,814	4,826	4,838	4,850	4,862	4,874	4,886
Yakima	105,044	105,695	106,349	107,007	107,669	108,336	109,006	109,681	110,360	111,043	111,730	112,422	113,118	113,818
Zillah	3,402	3,424	3,445	3,467	3,489	3,511	3,533	3,555	3,577	3,600	3,623	3,646	3,669	3,692

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.

5.8.3.2 Urban Land Use Categories

The Urban land use categories for the unincorporated UGAs are determined in a coordinated process between the County and each of the fourteen cities and towns during the Growth

5.8.5 Urban Land Lands – Future Land Use Needs

To ensure Yakima County has not restricted the supply of urban land through its population allocations, the OFM 2040 medium projection of 318,494 is used throughout the entire Land Use Element to calculate the adequacy of the available land supply. If recent trends continue, approximately 63 percent of this figure, or 200,511 people, will be living in the cities or towns by the year 2040. Based on these same trends, approximately 11 percent of the population in the year 2040, or 38,359 people, will be living within the unincorporated UGAs. If these figures hold, the total urban population in 2040 will equal 238,870. Once the population has been projected the Growth Management Act requires Yakima County to determine the necessary amount of land needed for future growth. The Land Capacity Analysis (LCA), is the tool for which Yakima County sizes UGA boundaries.

5.8.5.1 Countywide Urban Growth Area Land Capacity Analysis

The Land Capacity Analysis (LCA), as outlined in subsection 5.8.3.1 above, is a quantitative estimate of how much vacant land (i.e., land available for future urban development) a city (and unincorporated UGA) currently has and will require as it grows over the succeeding 20-year period. It begins with consultation between Yakima County and each of its cities and towns to select a population growth projection from a range of population growth projections provided by 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. The LCA quantifies the amount of vacant land needed for each city and town's growth then compares those results to the amount of vacant land currently within the UGA. This will determine if there is a surplus or a deficit of vacant land for future growth to year 2040. A more detailed description of the LCA is outlined in the example below:

- Quantity of Land Calculations for Non-Industrial Uses

1. Population and Households Analysis: Using a city's projected 2015-2040 population growth, this analysis estimates the number of additional households that will be added to the city's population by the year 2040. An example city is described below:

2040 population forecast for city (County Planning)	Example 1000 people
2015 population in city (OFM's April 1 estimate)	Example 500 people
Population increase in city 2015-2040	Example 500 people
<u>Average household size in city (2010 Census)</u>	<u>Example 2.87 people</u>
Additional households in city 2015-2040 ($500 \div 2.87$)	Example 174 households

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

$$8,500 \text{ sq. ft.} \times 174 \text{ households} = 1,479,000 \text{ sq. ft.} / 43,560 \text{ sq. ft. (1 acre)} = 34 \text{ acres}$$

3. Future Commercial & Retail Land Need: The acreage needed for future commercial and retail growth through 2040 is 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):

500 people x 0.0169 acres per capita = 8 Acres

4. Future Community Facilities Land Need: The acreage needed for future community facilities growth through 2040 is 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):

500 people x 0.0494 acres per capita = 25 Acres

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

Residential acreage needed	34 Acres +	5.1 Acres for streets
+ Commercial/retail acreage needed	8 Acres +	1.2 Acres for streets
+ Community facilities acreage needed	<u>25 Acres +</u>	<u>3.75 Acres for streets</u>
= Subtotal of total streets acreage	(67 Acres x 0.15)	= 10.05 Acres for streets

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 City and the UGA to accommodate projected growth through 2040.

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

Acres needed for future residential uses	39.1 Acres
+Acres needed for future commercial & retail uses	9.2 Acres
+ <u>Acres needed for future community facilities</u>	<u>28.75 Acres</u>
=Total vacant acres needed for future non-industrial uses	77.05 Acres

7. Current Vacant Land Analysis:

Yakima County's Division of Geographic Information Services (GIS) determines the current acreage of developed residential, commercial & retail, and community facilities. GIS also determines the acreage of current vacant land and partially vacant land in each zoning district. In this example city, summaries of whether each zoning

group has a surplus or a deficit of vacant land to accommodate the projected growth through 2040 are listed in Table below:

Table 5.8.5.1-1 Example Land Capacity Analyses (LCA) Summary – Excluding Industrially-zoned Land					
Zoning Group	Total Acres Within City Limits	Outside City Limits & Within Current UGA	Total: Within City Limits and Within Current UGA	Total Acres needed from Step 6 above	Determination of Surplus or Deficit
Residential	Vacant: 13 acres	Vacant: 51 acres	Vacant: 64 Acres	39.1 acres	Surplus: 24.9 acres
Commercial	Vacant: 18 acres	Vacant: 34 acres	Vacant: 52 Acres	9.2 acres	Surplus: 42.8 acres
Community Facilities	Vacant: 0 acres	Vacant: 0 acres	Vacant: 0 Acres	28.75 acres	Deficit: 28.75 acres
Total of above Zoning Groups	Vacant: 31 acres	Vacant: 85 acres	Vacant: 116 Acres	77.05 acres	Surplus: 38.95 acres

Based on the example shown in the Table above, there is roughly a total of 116 vacant acres inside the UGA and based on the LCA in steps 1 through 6 the example city needed roughly 77.05 acres for next twenty plus years of growth, which means there is a surplus of 38.95 acres available in the current UGA to accommodate growth through 2040.

8. 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 that is needed for growth over the 25-year period from 2015 to 2040. In our example above, the city has 116 vacant acres and needs 77.05 vacant acres for future growth, it has 51% more vacant land than needed for growth. So the Computed MCF is 51%, as calculated below:

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

Example: $[116 \text{ acres} \div 77.05 \text{ acres}] - 1.00 = 0.51 = 51\%$

The example city has a 51% MCF, which means that there is 51% more vacant land than needed for growth over the twenty-five year period from 2015 to 2040. In Yakima County, the MCF is set by policy within **Horizon 2040** at 10%. 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. The calculation below outlines how to determine the years of growth for our example city.

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

$$\text{Example 1: } (51\% \text{ MCF} + 1) \times 25 \text{ years} = 37.75 \text{ years of growth available}$$

Table 5.8.5.1-2 Example MCF and Years of Growth	
	Within the Current UGA
Market Choice Factor	Vacant: 116 acres
Years of Growth	51% 37.75 years

The figures for both the “MCF” and “years of growth” metrics for the example city show that the MCF of 51% exceeds the plan policy standard of 10% and the years of growth of 37.75 also exceed the GMA mandate of twenty years. Thus, the example city does not need to have its UGA boundary expanded and more importantly, the current UGA appears large enough to accommodate the next twenty plus years of growth.

9. Future Industrial Land Needs:

As provided by the analytical process 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.”

5.8.5.2 Countywide Urban Growth Area Land Capacity Analysis Results

The Growth Management Act (GMA) requires Yakima County to review the UGAs of each of the County’s fourteen cities and towns as part of the 2017 period comprehensive plan update. GMA requires this update once every eight years. In coordination with those cities and towns, the County conducted a Land Capacity Analysis (LCA) to determine the amount of urban lands needed for twenty years of growth. The land needed to accommodate that growth is broken down into four categories: Residential, Commercial/Retail, Community Facilities and Streets. The estimated amount of land needed to accommodate future growth is outlined in Table 5.8.5.2-1 below.

Table 5.8.5.2-1 Land Capacity Analysis (LCA) – Land Needed For Future Growth							
Yakima Cities	Projected Pop Increase From 2015-2040	Person Per Household (Census)	Number Households needed	Land Needed For Residential (Acres)	Land Needed For Commercial & Retail (Acres)	Land Needed For Community Facilities (Acres)	Land Needed For Streets (Acres)
Grandview	2,289	2.97	794	155	19	245	63
Granger	1,923	4.14	464	87	10	62	24
Harrah	123	3.53	35	7	1	4	2
Mabton	339	4.31	79	15	2	7	4
Moxee	3,870	3.26	1,187	233	18	74	49
Naches	254	2.51	101	20	13	30	9
Selah	2,410	2.64	913	178	29	115	48
Sunnyside	3,117	3.60	866	169	82	107	54
Tieton	451	3.33	135	26	3	3	5
Toppenish	990	3.33	297	58	14	21	14
Union Gap	1,001	2.90	345	67	43	32	21
Wapato	677	3.88	174	36	6	23	10
Yakima	17,167	2.68	6,406	1,250	297	271	273
Zillah	1,876	2.87	654	128	32	93	38

Source: Yakima County GIS – UGA Analysis 2015-2016



Staff Recommendation

Union Gap UGA Current Zoning

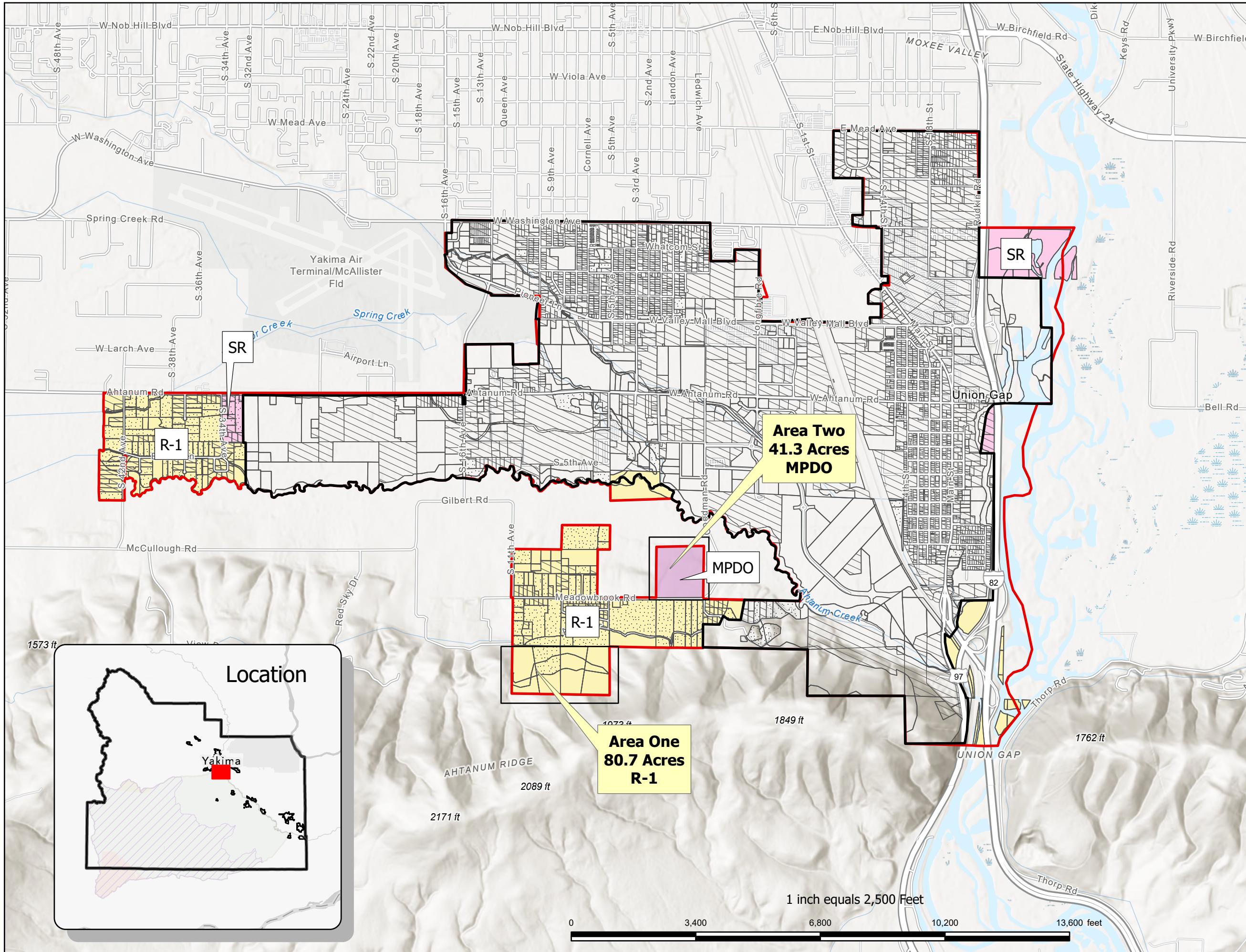
- Current City Limits (Black Box)
- Current Urban Growth Boundary (Red Box)

Development Potential

- Developed (Hatched)
- Vacant (White)
- Partially Developed (Dotted)

Current County Zoning

- Master Plan Development Overlay (MPDO) (Pink)
- Single-Family Residential (R-1) (Yellow)
- Suburban Residential (SR) (Light Pink)



Date: 10/5/2025
Parcel Lot lines are for visual display only. Do not use for legal purposes.

Attachment 4



Staff Recommendation

Union Gap UGA Proposed Zoning

- Current City Limits (Black Box)
- Current Urban Growth Boundary (Red Box)

Development Potential

- Developed (Hatched)
- Vacant (White)
- Partially Developed (Dotted)

Proposed County Zoning

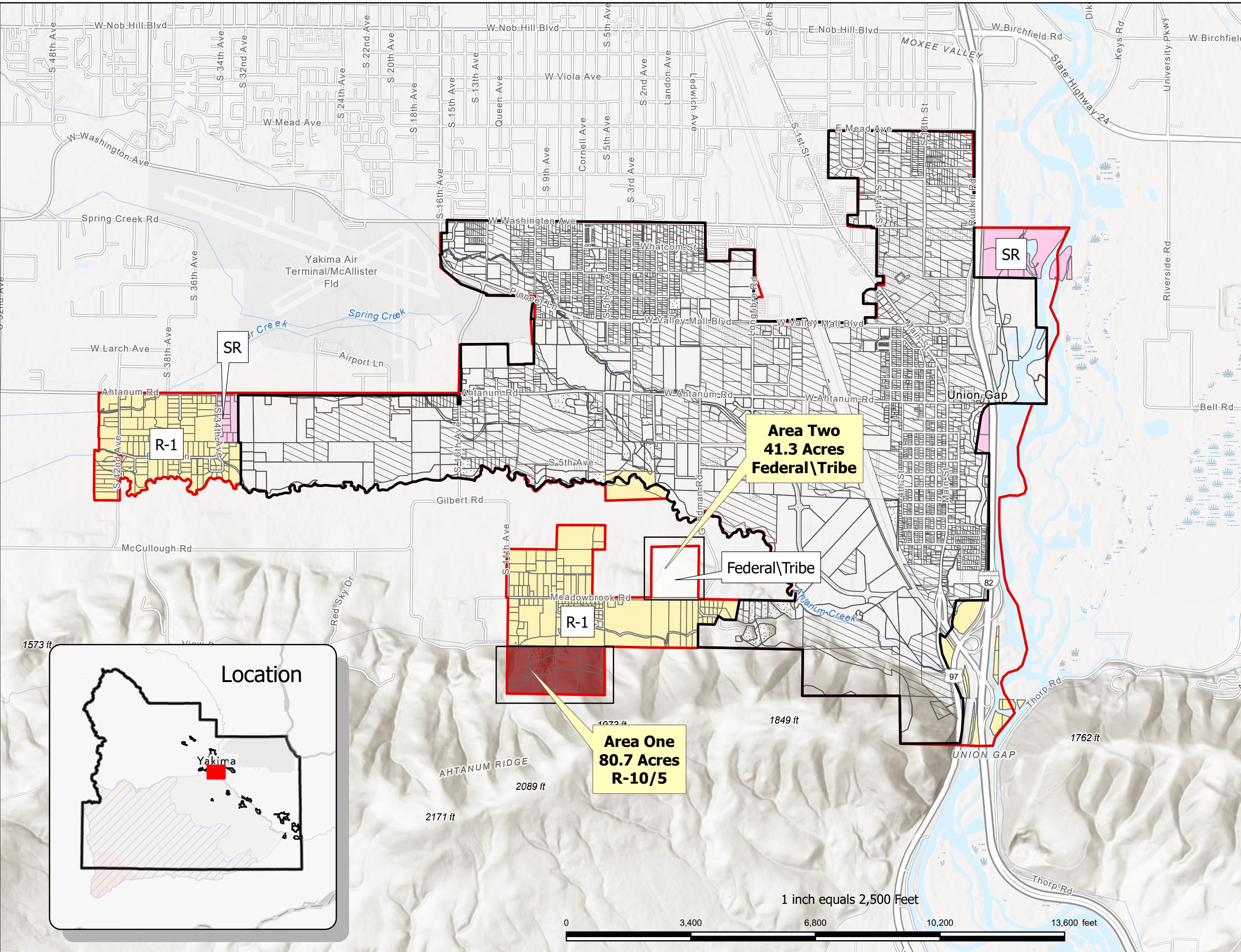
- Federal Land / Tribal Trust (White)
- Single-Family Residential (R-1) (Yellow)
- Rural-10/5 (Red)
- Suburban Residential (SR) (Pink)



Date: 10/5/2025

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Attachment 5





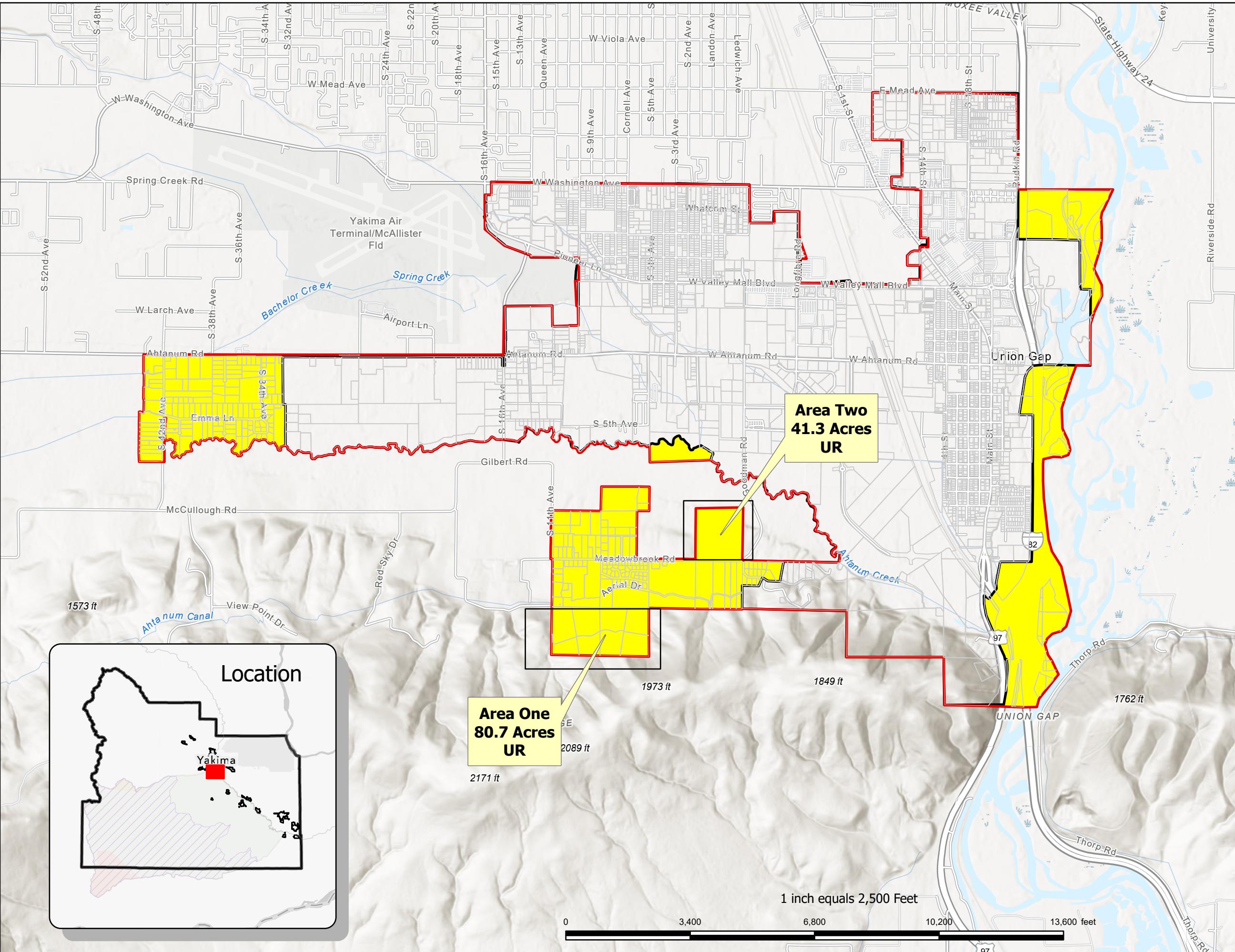
Staff Recommendation – Union Gap UGA

Current Land-Use Designations

Current Urban Growth Boundary
Current City Limits

County Comprehensive Plan Designations

Urban Residential - UR



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Staff Recommendation – Union Gap UGA

Recommended Changes Land-Use Designations

■ Current Urban Growth Boundary
■ Current City Limits

County Comprehensive Plan Designations

■ Rural Self-Sufficient (RSS)
■ Urban Residential (UR)
■ Urban Tribal (UT)

Location

Area One
80.7 Acres
UR To RSS

2171 ft

1973 ft

2089 ft

1849 ft

1573 ft

1762 ft

97

82

82

82

82

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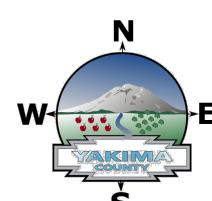
82

82

1 inch equals 2,500 Feet

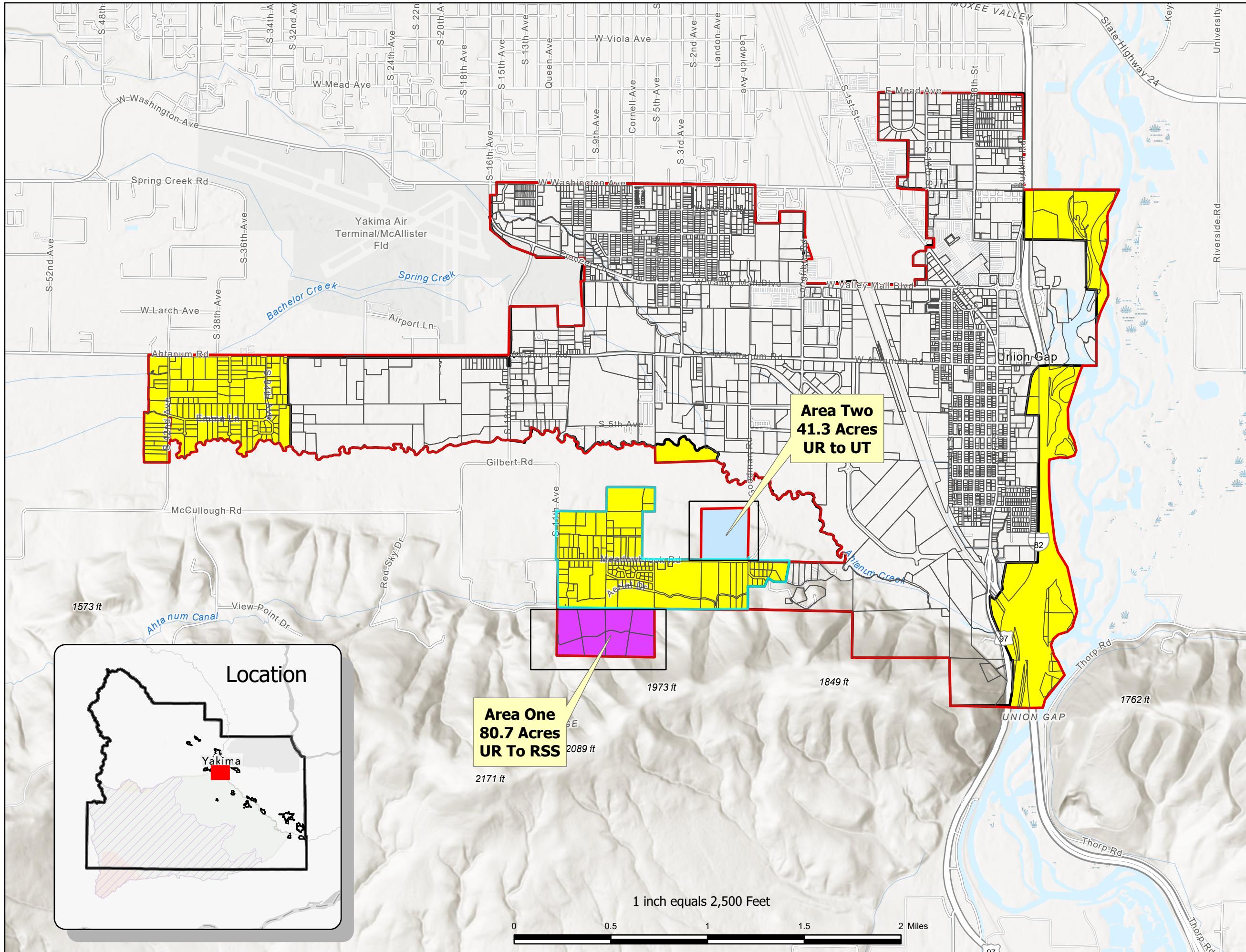
0 0.5 1 1.5 2 Miles

Name: UnionGap_LandUseChange-Attach



Date: 10/5/2025
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Attachment 7





Staff Recommendation Union Gap UGA Recommended Changes

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

 Proposed Urban Growth Boundary
 Current City Limits
 Current Urban Growth Boundary

County Zoning

R-1 - Single Family Residential
 AG - Agricultural
 GC - General Commercial
 M-1 - Light Industrial
 R-10/5 - Rural -10/5

County Comprehensive Plan Designations

U - Urban
 UR - Urban Residential
 UP - Urban Public
 UC - Urban Commercial
 UI - Urban Industrial
 UT - Urban Tribal
 AR - Agricultural Resource
 RSS - Rural Self-Sufficient



Date: 10/5/2025
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