1. **Introduction**

The Growth Management Act (GMA) - RCW 36.70A.130(3) provides:

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

(b) The county comprehensive plan designating urban growth areas, and the densities permitted in the urban growth areas by the comprehensive plans of the county and each city located within the urban growth areas, shall be revised to accommodate the urban growth projected to occur in the county for the succeeding twenty-year period.”

Yakima County and it’s cities and towns have completed their Urban Growth Areas periodic review and revisions as required under RCW 36.70A.130(5) by June 30, 2017.

The mandates mentioned above are being met by two reports:

a. **Report 1 - Yakima County Population and Employment Projections and Allocations** was issued on July 14, 2015 and establishes the number of people to accommodate in each of the County’s 14 UGAs in year 2040. Attachment 2 is the excerpt from Report 1 showing the population projections for Harrah.

b. **Report 2 – Land Capacity Analysis** identifies the amount of land each of the County’s 14 cities has for future growth within their Urban Growth Areas. This staff report includes the Land Capacity for Harrah’s UGA (Attachment 3) and is part of Yakima County’s efforts to meet its obligations under the RCWs cited above. It constitutes a recommendation to the County Planning Commission as well as the County’s initial “show-your-work” exhibit as required by the GMA.

RCW 36.70A.130(2)(b) requires Yakima County to establish procedures and schedules whereby comprehensive plan amendments are considered by the Board.

Section II.E.1.a of the Master Interlocal Agreement for Growth Management Act Implementation in Yakima County provides for towns and cities to request amendments to UGA boundaries outside of the 5-year schedule by requesting the emergency amendment process allowed under RCW 36.70A.130(2)(b). This proposed change is due to a request from the Town of Harrah for
the consideration for an emergency amendment to their UGA, with the coordination of the Mt. Adams School District, for the siting of a new school.

   a. **Overview**

   A Land Capacity Analysis (LCA) is an essential component in reviewing a UGA. A LCA is a quantitative estimate of how much vacant land (i.e., land available for future urban development) a city or town currently has and will require as it grows over the succeeding 20-year period. It begins with consultation between a county and each of its cities and towns to select a population growth projection from a range of population growth projections provided by the state Office of Financial Management (OFM). The population projection, together with a county employment growth forecast, is then allocated primarily to UGAs, to assist in sizing UGAs to accommodate future urban growth.

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

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

   i. **Land in city.** This is used to describe lands within the city limits.

   ii. **Land outside city.** This is used to describe the land between the UGA boundary and city limits.

   iii. **Land in UGA.** This is used to describe the area inside the city limits AND the land outside the city. It could also be described as $i + ii = iii$.

   The LCA quantifies the amount of vacant land needed for Harrah’s growth according to the analytical process (see Attachment 1) outlined in the “Urban Lands” section in the Land Use Element of Yakima County’s Comprehensive Plan – **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 a deficit of vacant land for future growth to the year 2040. The general calculation is outlined below:

   $$\text{Acres Needed for Future Growth in the UGA}\,^1 = \text{Acres Currently Vacant in the UGA}\,^2$$

---

= Surplus (or Deficit) of Vacant Land in the UGA

b. **Quantity of land calculation for non-industrial uses**
Yakima County’s Division of Geographic Information Services (GIS) determined the current acreage of developed residential, commercial & retail, and community facilities. GIS also determined the acreage of current vacant land and partially vacant land in each zoning district to arrive at the figures used in the LCA spreadsheet (Attachment 3). The GIS data are reported and depicted geographically in Attachment 4.

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

1) **Population and Households Analysis:** Based on Harrah’s projected 2015-2040 population growth, this analysis estimates 35 additional households will be added to the city’s population by the year 2040.

| 2040 population forecast for city (County Planning) | 773 people |
| 2015 population in city (OFM’s April 1 estimate) | 650 people |
| Population increase in city 2015-2040 | 123 people |
| Average household size in city (2010 Census) | 3.53 people |
| Additional households in city 2015-2040 (123 ÷ 3.53) | 35 households |

2) **Future Residential Land Need:** The acreage needed for future residential growth through 2040 was 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:

$$8,500 \text{ sq. ft} \times 35 \text{ households} = 297,500 \text{ sq. ft.} / 43,560 \text{ sq. ft. (1 acre)} = 7 \text{ acres}$$

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

$$123 \text{ people} \times 0.0046 \text{ acres per capita} = 1 \text{ Acre}$$

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

---

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

3 Parcels classified as “partially vacant” are those greater than one acre and have more than $10,000 in assessed improvements. For such parcels GIS counts one acre as developed and counts the remainder acreage as vacant (i.e., available for development). Note: Not all parcel meeting these criteria are classified as partially vacant. Aerial photo interpretation, local knowledge, and city or town input are used to limit this classification mostly to residential parcels.
123 people x 0.0338 acres per capita = 4 Acres

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

| Residential acreage needed | 7 Acres |
| + Commercial/retail acreage needed | 1 Acre |
| + Community facilities acreage needed | 4 Acres |
| = Subtotal | 12 Acres |

Total streets acreage needed (Subtotal x 0.15) = 2 Acres

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

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

| Acres needed for future residential uses | 8 Acres |
| + Acres needed for future commercial & retail uses | 1 Acre |
| + Acres needed for future community facilities | 5 Acres |
| = Total vacant acres needed for future non-industrial uses | 14 Acres |

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

<table>
<thead>
<tr>
<th>Zoning Group</th>
<th>Within Town Limits</th>
<th>Outside Town Limits &amp; Within Current UGA</th>
<th>Total: Within Town Limits and Within Current UGA</th>
<th>Outside Town Limits and Within Proposed UGA</th>
<th>Total: Within Town Limits and Within Proposed UGA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residually-zoned</td>
<td>Surplus: 0 acres</td>
<td>Vacant: 45 acres</td>
<td>Surplus: 45 acres</td>
<td>Vacant: 64 acres</td>
<td>Vacant: 64 acres</td>
</tr>
<tr>
<td>Commercially-zoned</td>
<td>Surplus: 1 acre</td>
<td>Vacant: 0 acres</td>
<td>Surplus: 1 acre</td>
<td>Vacant: 0 acres</td>
<td>Vacant: 1 acre</td>
</tr>
<tr>
<td>Community Facilities</td>
<td>Deficit: 5 acres</td>
<td>Vacant: 0 acres</td>
<td>Deficit: 5 acres</td>
<td>Vacant: 0 acres</td>
<td>Deficit: 5 acres</td>
</tr>
<tr>
<td>Total of above Zoning Groups</td>
<td>Deficit: 4 acres</td>
<td>Vacant: 45 acres</td>
<td>Surplus: 41 acres</td>
<td>Vacant: 64 acres</td>
<td>Surplus: 60 acres</td>
</tr>
</tbody>
</table>

<sup>4</sup> Including associated streets
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 the growth through 2040.

| Table 2: LCA Summary – In Town and In UGA – Excluding Industrially-zoned Land |
|-------------------|-------------------|
| Yakima County LCA | Harrah Proposal |
| **Capacity for Growth within Town:** | **Proposed Capacity for Growth within the UGA:** |
| 8 (Acres of currently vacant land in Town) | 64 (Acres of currently vacant land within the City) |
| -8 (Acres needed for growth) | 8 (Acres vacant within Town) |
| = 0 (Acres of vacant acres in Town) | -8 (Acres needed for growth) |
| = 45 (Surplus vacant acres within the Current UGA) | = 64 (Surplus vacant acres within the Proposed UGA) |

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

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. For example, if a city has 120 vacant acres and needs 100 vacant acres for future growth, it has 20% more vacant land than needed for growth, so the Computed MCF is 20%, as calculated below:

$\frac{(\text{acres currently vacant})}{(\text{acres needed for future growth})} - 1.00 = \text{Computed MCF}$

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

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 fill all the vacant land at the projected future growth rate. This metric is a function of the MCF. For example, if a city has a 0% MCF, this means that the acres of vacant land are equal to the number of acres needed for growth over the 25 year period from 2015 to 2040, so it has enough land for 25 years of growth, as calculated below. If a city has an 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:

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

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

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 Harrah are provided in Table 3.

<table>
<thead>
<tr>
<th>Table 3: Harrah’s Computed MCF and Years of Growth Available (Excluding Industrially Zoned Lands)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lands within the city</td>
</tr>
<tr>
<td>Computed MCF</td>
</tr>
<tr>
<td>Years of growth available</td>
</tr>
</tbody>
</table>

### c. Future Industrial Land Needs

As provided by the analytical process (see Attachment 1) outlined in the “Urban Lands” section in the Land Use Element of Yakima County’s Comprehensive Plan – *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 analysis provides the following current acreages of industrially-zoned lands (Attachment 3, Section “7 – Future Industrial Land Need”):

| Current developed industrially-zoned land in town | 7 acres |
| Current developed industrially-zoned land outside town | 0 acres |
| Current vacant industrially-zoned land in town | 2 acres |
| Current vacant industrially-zoned land outside town | 0 acres |
| Industrial acres to add to UGA | 0 acres |
| Industrial acres to remove from UGA | 0 acres |

The Town of Harrah is not proposing any changes to their Industrial land at this time.

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

In addition to reviewing Harrah’s UGA as done above, RCW 36.70A.130(3)(a) requires Yakima County to review the densities permitted within both the incorporated and unincorporated portions of the UGA to ensure project growth may be accommodated.

The Town of Harrah has one Land Use Designations listed in its Comprehensive Plan that identify residential growth identified as: R Zone (Residential). The County has one Residential zoning districts represented within the UGA and outside of the Town of Harrah. The zoning districts and corresponding densities are as follows:

<table>
<thead>
<tr>
<th>Town of Harrah Zoning</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zoning District</td>
</tr>
<tr>
<td>(Residential)</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>-------------------------------</td>
</tr>
<tr>
<td>R-1 (Single Family Residential)</td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

Yakima County Zoning in Harrah’s Urban Growth Area (YCC Title 19)

Assuming a minimum density of 6 dwelling units per acre, the vacant 8 acres of residentially zoned land in the Town of Harrah will accommodate over 48 dwelling units (including associated streets). Therefore, the 35 households projected through 2040 could be accommodated by the City’s current development regulations.

Assuming the County’s maximum density of 7 dwelling units per acre, the existing 45 acres of residentially-zoned land outside of the city would accommodate an additional 315 dwelling units. Therefore, the 35 households projected through 2040 could be accommodated by the Town’s and County’s current development regulations.

4. **Town/County Collaboration**

County staff met with Harrah’s and Mt. Adams School District (MASD) representatives on several occasions. County staff received an official request from the Town of Harrah on April 22 requesting parcel number 181135-21002 to be included in the Harrah Urban Growth Area. Their request is to apply the Urban Residential land use designation on the property (from Agricultural Resource) and change the zoning from Agriculture to Single-Family Residential - (as shown in Attachment 9):

The proposal to add land to the city is based on a request from the MASD to construct a new K-8 school adjacent to the Town of Harrah UGA. The MASD intends the site the school on two parcels: parcel number 181135-21003 is already in the UGA and the proposed adjacent parcel 181135-21002. Schools are allowed in the Agricultural zoning district and in the UGA; however, the extension of sewer services is required, the parcels must be in the same zoning to merge them to properly site the school, and the Town intends to annex the property as soon as it is included within the UGA.

5. **Proposed Revised Plan Designations Within the Unincorporated UGA**

Attachment 7 (“Mabton Proposed Urban Plan Designations and Zoning Map”) depicts the detailed urban comp plan designations and zoning that County planning staff are proposing for the unincorporated UGA.

6. **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 Section 16B.10.095 criteria as follows:
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: The proposal is consistent with all plans regarding the inclusion into the Urban Growth Area. An updated capital facilities plan would be needed.

(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: Parcel number 181135-21003 was included in the UGA during the 2016 Yakima County UGA review cycle. This proposal would include the parcel south (181135-21002) into the UGA. The intent is to site a K-8 school with the MASD on the property. Although schools can be sited in the Agriculture zoning district, the Town of Harrah intend to annex both parcels once they are included in the UGA. Although the existing agricultural use of the land is consistent with the Agricultural Resource land use designation, the siting of the school would also be consistent with the Urban Residential land use 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;

Findings: The proposal is for a change in land use designation and concurrent rezone to allow for the siting of a new school adjacent to the Town of Harrah. The Mt. Adams School District intends to site the school on the parcel that is proposed to be added into the UGA (parcel number 181135-21002) and a parcel that is already in the UGA (parcel number 181135-21003). The MASD has been looking for a parcel with utilities and that is large enough to site their school to service their district.

(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; however, the applicants have provided information that there is no other land available in the UGA that would suit the needs of their project that would provide enough land and the necessary public facilities. The siting of school is consistent with Urban Residential, Urban Public and Agriculture; however, inclusion into the UGA is needed for the extension of sewer and to be merged into parcel number 181135-21003 that is already in the UGA.

(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: The proposal has been reviewed with the agricultural de-designation criteria (Attachment 8). The agricultural de-designation requires 8 “yes” responses out of 10. Upon evaluation, this proposal only had 6 “yes” responses. The determination as to whether the public good of the proposed school would outweigh the low score of the de-designation criteria must be made.

(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 adjacent to the property. The property is proposed to be accessed off Branch Road

(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 staff does not foresee that this UGA update will increase pressure for additional UGA boundary changes.

Overall Findings: The proposal is mostly 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;

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(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 agricultural resource de-designation process, outlined in Horizon 2040 Chapter 5.10.3. That analysis can be reviewed in Attachment 8.

(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: Lands added to the UGA (identified in Attachment 6) will be consistent with Yakima County land use designations and County zoning.

(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 process (SEP2019-00012).

(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 Harrah’s UGA are map amendments rather than policy or text amendments.

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

Findings: Not applicable. The changes to Harrah’s UGA are map amendments rather than policy or text amendments.
7. **Conclusions**
   a. The County’s Land Capacity Analysis for Harrah calculates a deficit of 4 acres of vacant land in the Town for future growth (excluding industrial growth), which represents available vacant land for 18 years of growth. The LCA calculates a surplus of 41 acres of vacant land in the UGA available for future growth (excluding industrial growth), which represent available vacant land for 98 years of growth. The Town of Harrah’s UGA proposal would represent a slight increase in the vacant land available for future growth (excluding industrial growth) representing available land for 133 years of growth. The existing UGA is able to accommodate the densities and projected non-industrial growth through 2040.

   b. Harrah is proposing to include a 20-acre parcel into the UGA as Urban Residential land. This results in an increase of 19 acres of residential land and a total increase of years of growth for the UGA. Although this represents a slight increase in years of growth, the Town of Harrah considers the proposal to include this property into the UGA to locate a new school a benefit to the community as a whole. Harrah intends to annex the entire site once this property is added into the UGA.

   c. Given the Harrah proposal is necessary for the siting of the new school and serves a public interest, the changes proposed should be considered for approval.

8. **Recommendations**
   a. Yakima County planning staff recommendations to the Town of Harrah’s proposed UGA changes are outlined in the Table below: (A map showing each area is included as Attachment 6.)

<table>
<thead>
<tr>
<th>Location (as shown in Attachment 6)</th>
<th>Harrah Proposal</th>
<th>County Planning Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Add To UGA</td>
<td>Remove From UGA</td>
</tr>
<tr>
<td>Area 1</td>
<td>20 Acres</td>
<td>Agricultural Resource</td>
</tr>
</tbody>
</table>

Note: Acres are approximate.

Attachments:
1. *Horizon 2040’s* description of the analytical process for the UGA Land Capacity Analysis
2. County’s Population Projection for Town of Harrah, 2015-2040
3. UGA Land Capacity Analysis (spreadsheet)
4. Harrah Current UGA Analysis 2019 (GIS map & report)
5. Harrah Proposed UGA Analysis 2019 (GIS map & report)
6. Harrah Proposed UGA Changes
7. Harrah Proposed Urban Plan Designations and Zoning Map
9. Harrah UGA Amendment Submittal
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.
### Harrah

#### Table 1. US Census and OFM Population Estimates

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Yakima County</td>
<td>222,581</td>
<td>231,902</td>
<td>243,231</td>
<td>244,700</td>
<td>246,000</td>
<td>247,250</td>
<td>248,800</td>
</tr>
<tr>
<td>Unincorporated</td>
<td>93,192</td>
<td>87,019</td>
<td>83,755</td>
<td>84,300</td>
<td>84,800</td>
<td>84,910</td>
<td>85,410</td>
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<tr>
<td>Incorporated</td>
<td>129,389</td>
<td>144,883</td>
<td>159,476</td>
<td>160,400</td>
<td>161,200</td>
<td>162,340</td>
<td>163,390</td>
</tr>
<tr>
<td>Total</td>
<td>222,581</td>
<td>231,902</td>
<td>243,231</td>
<td>244,700</td>
<td>246,000</td>
<td>247,250</td>
<td>248,800</td>
</tr>
<tr>
<td>Harrah</td>
<td>566</td>
<td>628</td>
<td>630</td>
<td>630</td>
<td>650</td>
<td>645</td>
<td>645</td>
</tr>
</tbody>
</table>

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

#### Table 2. Yakima County Preferred Alternative Twenty-year Population Projection Growth Rates

<table>
<thead>
<tr>
<th>City</th>
<th>OFM Population Estimates 2010-2014 Annual Growth Rate (Step 2.)</th>
<th>Yakima County Adjusted Annual Growth Rate (Step 3.)</th>
<th>Adjusted Growth Rates Used Showing Decline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harrah</td>
<td></td>
<td>0.60%</td>
<td>0.84%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0.84%</td>
<td>0.79%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0.79%</td>
<td>0.72%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0.72%</td>
<td>0.66%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0.66%</td>
<td>0.62%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0.62%</td>
<td>0.56%</td>
</tr>
</tbody>
</table>

Source: Yakima County.

#### Table 3. Yakima County’s Preferred Alternative Twenty-year Projected Population

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Yakima County</td>
<td>256,341</td>
<td>258,730</td>
<td>261,462</td>
<td>264,150</td>
<td>266,780</td>
<td>269,347</td>
</tr>
<tr>
<td>Harrah</td>
<td>650</td>
<td>656</td>
<td>661</td>
<td>667</td>
<td>672</td>
<td>677</td>
</tr>
<tr>
<td></td>
<td>2021</td>
<td>2022</td>
<td>2023</td>
<td>2024</td>
<td>2025</td>
<td>2026</td>
</tr>
<tr>
<td>Yakima County</td>
<td>271,956</td>
<td>274,512</td>
<td>277,037</td>
<td>279,530</td>
<td>282,057</td>
<td>284,652</td>
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<tr>
<td>Harrah</td>
<td>682</td>
<td>688</td>
<td>693</td>
<td>698</td>
<td>703</td>
<td>708</td>
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<tr>
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<td>2032</td>
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<td>Yakima County</td>
<td>287,148</td>
<td>289,615</td>
<td>292,046</td>
<td>294,445</td>
<td>297,036</td>
<td>299,485</td>
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<tr>
<td>Harrah</td>
<td>713</td>
<td>718</td>
<td>723</td>
<td>727</td>
<td>732</td>
<td>737</td>
</tr>
<tr>
<td></td>
<td>2033</td>
<td>2034</td>
<td>2035</td>
<td>2036</td>
<td>2037</td>
<td>2038</td>
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<tr>
<td>Yakima County</td>
<td>301,896</td>
<td>304,276</td>
<td>306,636</td>
<td>309,052</td>
<td>311,443</td>
<td>313,811</td>
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<tr>
<td>Harrah</td>
<td>741</td>
<td>746</td>
<td>751</td>
<td>755</td>
<td>760</td>
<td>764</td>
</tr>
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<td></td>
<td>2039</td>
<td>2040</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Yakima County</td>
<td>316,161</td>
<td>318,494</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Harrah</td>
<td>769</td>
<td>773</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Source: Office Financial Management (OFM) and Yakima County.
The Office of Financial Management (OFM) has Harrah at an estimated population of 645 for 2014. Yakima County is projecting Harrah's population at 773 in the year 2040. That is an increase of 128 individuals over the twenty-six year timespan. This allocation of 128 individuals will be used by Yakima County and the Town of Harrah as part of the upcoming Urban Growth Area analysis and for other comprehensive planning needs.

The 2008-2012 American Community Survey US Census has Harrah at an estimated civilian labor force of 251 for 2012. Yakima County is projecting Harrah's civilian labor force at 298 in the year 2040. That is an increase of 47 jobs over the twenty-eight year timespan. This allocation of 47 jobs will be used by Yakima County and Harrah as part of the upcoming Urban Growth Area analysis and for other comprehensive planning needs.

---

**Table 4. Yakima County Preferred Alternative Medium Population Projections for Yakima County, Harrah and Unincorporated Areas (2040)**

(See Table 23)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Yakima County</td>
<td>248,800</td>
<td>318,494</td>
<td>69,694</td>
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<tr>
<td>Unincorporated Total</td>
<td>85,410</td>
<td>117,983</td>
<td>32,573</td>
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<tr>
<td>Incorporated Total</td>
<td>163,390</td>
<td>200,511</td>
<td>37,121</td>
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<tr>
<td>Harrah</td>
<td>645</td>
<td>773</td>
<td>128</td>
</tr>
</tbody>
</table>

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

**Table 5. Yakima County Preferred Alternative 2040 Employment Projection and Allocation**

(Table 25 Section III.)

<table>
<thead>
<tr>
<th></th>
<th>2012 Civilian Labor Force#</th>
<th>Yakima County Preferred Alternative 2040 Projected Population</th>
<th>Yakima County Preferred Alternative 2040 Employment Projection</th>
<th>Number of Additional Jobs Needed by 2040</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yakima County</td>
<td>110,603</td>
<td>318,494</td>
<td>143,322</td>
<td>32,719</td>
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<tr>
<td>Harrah</td>
<td>251</td>
<td>773</td>
<td>298</td>
<td>47</td>
</tr>
</tbody>
</table>

### 1 - Population and Households Analysis

<table>
<thead>
<tr>
<th>Units</th>
<th>Hanrah Current 2019</th>
<th>Hanrah Proposed 2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>people</td>
<td>773</td>
<td>773</td>
</tr>
<tr>
<td>people</td>
<td>650</td>
<td>650</td>
</tr>
<tr>
<td>people</td>
<td>123</td>
<td>123</td>
</tr>
<tr>
<td>people per household</td>
<td>3.53</td>
<td>3.53</td>
</tr>
<tr>
<td>households</td>
<td>35</td>
<td>35</td>
</tr>
</tbody>
</table>

### 2 - Future Residential Land Need

- **Desired average density of future housing, 2015-2040 (5.1 dwelling units per acre)**  
  sq. ft. per dwelling unit: 8,500

- **Land needed for future housing (e + f ÷ 43,560 sq. ft. per acre)**  
  acres: 7

### 3 - Future Commercial & Retail Land Need

- **Current developed commercial & retail land in City from GIS analysis**  
  acres: 2

- **Current vacant community facilities land in City per person (h + b)**  
  acres per person: 0.0046

- **Land needed for future commercial & retail (j + c)**  
  acres: 1

### 4 - Future Community Facilities' Land Need

- **Current developed community facilities land in City from GIS analysis**  
  acres: 22

- **Current developed community facilities land in City per person (k + b)**  
  acres per person: 0.0338

- **Land needed for future community facilities (m + c)**  
  acres: 4

### 5 - Future Streets Land Need

- **Land needed for future streets (p ÷ 15%)**  
  acres: 12

### 6 - Land Capacity Analysis

#### Residentially-zoned capacity
- **Current vacant residentially-zoned land in City from GIS analysis**  
  acres: 8

- **(minus) Land needed for housing and associated streets (g ÷ 115%)**  
  acres: (8)

- **Surplus (Deficit) of vacant residentially-zoned land in City (r + s)**  
  acres: 0

#### Commercially-zoned capacity
- **Current vacant commercially-zoned land in City from GIS analysis**  
  acres: 2

- **(minus) Land needed for future community facilities and associated streets (j ÷ 115%)**  
  acres: (2)

- **Surplus (Deficit) of vacant commercially-zoned land in City (x + y)**  
  acres: 1

#### Community Facilities capacity
- **Current vacant community facilities land in City from GIS analysis**  
  acres: 0

- **(minus) Land needed for future community facilities and associated streets (-n ÷ 115%)**  
  acres: (0)

- **Surplus (Deficit) of vacant community facilities land in City (dd + ee)**  
  acres: 0

#### Capacity for growth in City (excluding Industrial growth)
- **Surplus (Deficit) of vacant land for residential, commercial, community facilities, & streets (t + z + ff)**  
  acres: (4)

- **Computed Market Choice Factor in City (MCF)**  
  %: -92%

#### Capacity for growth outside City (excluding Industrial growth)
- **Years of growth available in City (kk + 1) • 25**  
  years: 18

#### Capacity for growth in UGA (excluding Industrial growth)
- **Surplus (Deficit) of vacant land for residential, commercial, community facilities, & streets (w + cc + ii)**  
  acres: 41

- **Computed Market Choice Factor in UGA (MCF)**  
  %: 291%

### 7 - Future Industrial Land Need

- **Current developed industrially-zoned land in City from GIS analysis**  
  acres: 7

- **Current developed industrially-zoned land outside City from GIS analysis**  
  acres: 2

- **Current vacant industrially-zoned land in City from GIS analysis**  
  acres: 2

- **Current vacant industrially-zoned land outside City from GIS analysis**  
  acres: 0

- **Industrial acres to add to UGA (based on City's economic development strategy)**  
  acres: 0

- **Industrial acres to remove from UGA (based on City's economic development strategy)**  
  acres: 0

---

*Community Facilities such as parks, schools, libraries, city halls, fire stations, churches*  
 **(vacant acres in City = needed acres) - 1 = (r + u + x + aa + dd + gg) ÷ (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
Harrah Proposed UGA Analysis 2019

Proposed Urban Growth Boundary
Urban Growth Boundaries
Harrah City Limits
Vacant
Partially Developed
Developed
Residential
Commercial
Industrial
Community Facility
Yakama Nation

Vacant Acres: 25.79
Developed Acres: 6.00

Acreage by Zone Groupings

RESIDENTIAL
Total Residential: 119.94
Total Residential Within the City: 53.52
Total Residential Outside City Limits: 66.42

Total Vacant: 72.64
Total Vacant Within the City: 8.22
Total Vacant Outside City Limits: 64.42

Total Developed: 47.30
Total Developed Within the City Limits: 45.30
Total Developed Outside City Limits: 2.00

COMMERCIAL
Total Commercial: 4.70
Total Commercial Within the City: 4.70
Total Commercial Outside City Limits: 0.00

Total Vacant: 1.86
Total Vacant Within the City Limits: 1.86
Total Vacant Outside City Limits: 0.00

Total Developed: 3.15
Total Developed Within the City Limits: 3.15
Total Developed Outside City Limits: 0.00

COMMUNITY FACILITIES
Total Community Facilities: 30.28
Total Community Facilities Within the City: 22.03
Total Community Facilities Outside City Limits: 8.25

Total Vacant: 0.00
Total Vacant Within the City Limits: 0.00
Total Vacant Outside City Limits: 0.00

Total Developed: 30.28
Total Developed Within the City Limits: 22.03
Total Developed Outside City Limits: 8.25

INDUSTRIAL
Total Industrial: 8.63
Total Industrial Within the City: 8.63
Total Industrial Outside City Limits: 0.00

Total Vacant: 1.86
Total Vacant Within the City Limits: 1.86
Total Vacant Outside City Limits: 0.00

Total Developed: 6.77
Total Developed Within the City Limits: 6.77
Total Developed Outside City Limits: 0.00

YAKAMA NATION LANDS
Total Yakama Nation Lands: 25.93
Total Yakama Nation Lands Within the City: 25.93
Total Yakama Nation Lands Outside City Limits: 0.00

Total Vacant: 23.93
Total Vacant Within the City Limits: 23.93
Total Vacant Outside City Limits: 0.00

Total Developed: 2.00
Total Developed Within the City Limits: 2.00
Total Developed Outside City Limits: 0.00

Total Acres: 189.49
Total Acres Within City: 114.82
Total Acres Outside City Limits Within UGA: 74.67
Total of acres that are Developed: 81.50
Total of acres that are Vacant: 76.20
Total of acres that are Partially Vacant: 31.79
Vacant Acres: 25.79
Developed Acres: 6.00

Harrah Report - UGA Analysis
05/20/2019
09:11:05

Date: 5/20/2019

Attachment 5
Harrah
Proposed UGA Changes

Date: 5/20/2019

- Harrah City Limits
- Proposed Urban Growth Boundaries
- Urban Growth Boundaries

County Zoning
- R-1 - Single Family Residential
- AG - Agricultural
- B-2 - Local Commercial
- R-10/5 - Rural -10/5

County Comprehensive Plan Designations
- U - Urban
- UR - Urban Residential
- AR - Agricultural Resource
- RSS - Rural Self-Sufficient

Area 1) ADD 20 Acres
AR (AG) to UR (R-1)
Attachment 8


The Agricultural 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 AG land of long term commercial significance.

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:

<table>
<thead>
<tr>
<th>Crop Yield Range</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>1000 to 867 bu/ac crop yield</td>
<td>4 points [Highest]</td>
</tr>
<tr>
<td>866 to 733 bu/ac crop yield</td>
<td>3 points [Above Average]</td>
</tr>
<tr>
<td>732 to 599 bu/ac crop yield</td>
<td>2 points [Average]</td>
</tr>
<tr>
<td>598 to 465 bu/ac crop yield</td>
<td>1 point [Below Average]</td>
</tr>
</tbody>
</table>
464 to 330 bu/ac crop yield 0 points [Lowest]

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

Staff analysis: The subject property is located within the boundary of the Yakama Nation; therefore, it does not fall within the Soil Survey of Yakima County. The soils have been mapped under the Soil Survey of Yakima Indian Reservation Irrigated Area. Although it is a different soil survey, the soil classifications are the same in both studies.

The subject site, as described by the Soils Survey of the Yakima Indian Reservation Irrigated Area, has 3 different soil classification:

176 – Warden silt loam (WfA), 0 to 2 percent slopes – irrigated apples 800 bu/acres = 3 points (Above Average)

32 – Esquatzel fine sandy loam (EtA), 0 to 2 percent slopes – irrigated apples 1,000 bu/acre = 4 points (Highest)

177 – Warden silt loam (WfB), 2 to 5 percent slopes – irrigated apples 800 bu/acres = 3 points (Above Average)

As shown in the Map below and the soil information above, this site has soils that are considered Prime Farm Soils. The Warden soil type WfA and WfB have above average soil value, and the Esquatzel soils has the highest value. It should be noted that the school can be sited on a parcel zoned Agricultural regardless of the value of soils Under the Ag de-designation criteria, an impact in favor of de-designation results from below average scores. The site is composed Prime Soils and scored the highest, therefore:

<table>
<thead>
<tr>
<th>Variable</th>
<th>Review Criteria</th>
<th>Impact to Ag - Yes or No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Soil</td>
<td>Average crop yield per Soil Survey</td>
<td>No</td>
</tr>
</tbody>
</table>
2. **Proximity to the Urban Growth Area**
Parcels are evaluated by their distance from an Urban Growth Area (UGA). The further away from the Urban Growth Area the less influence it has on a parcel to develop at some higher use. Thus, a higher numerical value for agriculture is assigned to parcels further away as follows:

- **Within ¼ mile of the UGA**: 0 points [Lowest]
- **Between ¼ and ½ mile**: 1 point [Below Average]
- **Between ½ mile and 1 mile**: 2 points [Average]
- **Between 1 mile and 2 miles**: 3 points [Above Average]
- **Greater than 2 miles from UGA**: 4 points [Highest]

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

<table>
<thead>
<tr>
<th>Variable</th>
<th>Review Criteria</th>
<th>Impact to Ag - Yes or No</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Proximity to Urban Growth Area</td>
<td>Within ¼ mile of the UGA</td>
<td>Yes</td>
</tr>
</tbody>
</table>

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:

<table>
<thead>
<tr>
<th>Parcel Size</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 5 acres</td>
<td>0</td>
</tr>
<tr>
<td>Between 5 and 10</td>
<td>1</td>
</tr>
<tr>
<td>Between 10 and 20</td>
<td>2</td>
</tr>
<tr>
<td>Between 20 and 40</td>
<td>3</td>
</tr>
<tr>
<td>Greater than 40</td>
<td>4</td>
</tr>
</tbody>
</table>

Staff analysis: This subject parcel is approximately 20 acres in size; however, there are 54 acres in contiguous ownership zoned AG outside of the UGA. Under the Ag de-designation criteria, an impact in favor of de-designation results from below average scores (i.e., 1 point and less). Therefore, the “Impact to Ag” for this site is “Yes.”

Staff analysis: This subject parcel is approximately 20 acres in size; however, there are 54 acres in contiguous ownership zoned AG outside of the UGA. Under the Ag de-designation criteria, an impact in favor of de-designation results from below average scores (i.e., 1 point and less). Therefore, the “Impact to Ag” for this site is “Yes.”

### Qualitative Analytical Process

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

#### 4. Availability of Public Facilities

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

Staff analysis: At this time, the subject property is not serviced by public water or sewer service; however, the property is adjacent to the UGA and public sewer and water are within the 1000’ of the property. The Town of Harrah roads adjacent and leading to the property are paved. Timelines on when the property would be annexed by the Town of Harrah if approved is unknown. This availability of public facilities indicates “Yes” impact to Ag.

### Variable Review Criteria Impact to Ag - Yes or No

<table>
<thead>
<tr>
<th>Variable</th>
<th>Review Criteria</th>
<th>Impact to Ag - Yes or No</th>
</tr>
</thead>
<tbody>
<tr>
<td>3. Predominant Parcel Size</td>
<td>Smaller than 10 acres</td>
<td>No</td>
</tr>
<tr>
<td>4. Availability of Public Facilities</td>
<td>Within 1000’ of water, sewer or paved road</td>
<td>Yes</td>
</tr>
</tbody>
</table>
5. Tax Status
Tax Status indicates the current land use and tax rate being claimed by the property owner and reported by the Assessor. An inference can be made by looking at the current tax status as to the property owners’ intent for the land. This intent alone cannot be considered when determining the appropriateness of the land for designation as Agricultural Land of Long-term Commercial Significance, but may be another indicator of the possibility of a more intense use of the land. When the majority of the parcels within the study area have a tax status other than Agriculture, then it is considered one factor for possible removal of the area from resource designation.

Staff analysis: The subject property is assessed as Agricultural. This indicates “No” impact to agriculture.

<table>
<thead>
<tr>
<th>Variable</th>
<th>Review Criteria</th>
<th>Impact to Ag - Yes or No</th>
</tr>
</thead>
<tbody>
<tr>
<td>5. Tax Status</td>
<td>Predominance of a tax status other than ag</td>
<td>No</td>
</tr>
</tbody>
</table>

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

Staff analysis: The subject property is located adjacent to the Town of Harrah. The property’s proximity to the Town and its services including Fire District #5 (with Fire Station #2 within 4 miles), police department, library (Harrah Community Library as part of the Yakima Valley Libraries system) and Harrah School District, presents “Yes” impacts to agriculture.

<table>
<thead>
<tr>
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<th>Review Criteria</th>
<th>Impact to Ag - Yes or No</th>
</tr>
</thead>
<tbody>
<tr>
<td>6. Availability of Public Services</td>
<td>Presents an adverse impact to ag</td>
<td>Yes</td>
</tr>
</tbody>
</table>

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 10 parcels immediately surrounding the subject property. The statistics for the sizes of those parcels are:

- 144 acres – total of 10 parcels
- 40.54 acres – largest parcel
- 14.44 acres – mean size of 10 parcels
- 0.14 acre – smallest parcel

The statistics above indicate a variety of lot sizes adjacent to the subject property and a lack of a specific settlement pattern and the intensity of use that would adversely impact agricultural practices on the subject property. This would typically indicate a “No” impact to agriculture because of the lack of a clear distinction either way. However, the fact that the subject property is located directly adjacent to both the UGA boundary and Harrah’s town limits would indicate that both the land use settlement patterns and intensity of land uses will increase and ultimately generate a “yes” impact to agriculture. The “yes” response also fits considering that the subject property itself is planned for the placement of a school.

<table>
<thead>
<tr>
<th>Variable</th>
<th>Review Criteria</th>
<th>Impact to Ag - Yes or No</th>
</tr>
</thead>
<tbody>
<tr>
<td>7. Land Use Settlement Patterns</td>
<td>Impact on ag</td>
<td>Yes</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Variable</th>
<th>Review Criteria</th>
<th>Impact to Ag - Yes or No</th>
</tr>
</thead>
<tbody>
<tr>
<td>8. Intensity of Nearby Land Uses</td>
<td>Impact on ag</td>
<td>Yes</td>
</tr>
</tbody>
</table>

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.

\nt2\Projects\Plan Amendments\2019 Plan Amendments\LRN19-011 Harrah UGA Amendment\PC_Hearing\8. Harrah_UGA_ExpansionAg_dedesignation tv.docx
Staff analysis: The Planning History coverage in GIS indicates there has been one short plat within one-half mile of the subject site. It should be noted that although there hasn’t been subdivisions in the County jurisdiction, the area to the northwest of the property within the Town has a high density. This indicates “no” impact to agriculture.

<table>
<thead>
<tr>
<th>Variable</th>
<th>Review Criteria</th>
<th>Impact to Ag - Yes or No</th>
</tr>
</thead>
<tbody>
<tr>
<td>9. History of Land Development</td>
<td>15 or more subdivisions within ½ mile</td>
<td>No</td>
</tr>
</tbody>
</table>

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 10 parcels adjacent to the subject site only 3 are in the current use agriculture tax program, which equates to roughly 70% of the neighboring property are being tax assessed at a higher rate. Therefore, the overwhelming majority of adjacent land values are generally being assessed at a higher rate than associated with agriculture, which indicates “Yes” impact to agriculture.

<table>
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<th>Impact to Ag - Yes or No</th>
</tr>
</thead>
<tbody>
<tr>
<td>10. Land Values under Alternative Uses</td>
<td>Assessed value indicates non-ag use</td>
<td>Yes</td>
</tr>
</tbody>
</table>

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

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

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

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

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. However, this proposal isn’t a county-wide or area-wide proposal to de-designate agricultural lands. It is only intending to de-designate one parcel, approximately 20 acres in size, which is adjacent to the UGA for the siting of school.

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

<table>
<thead>
<tr>
<th>Variable</th>
<th>Review Criteria</th>
<th>Impact to Ag - Yes or No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Soil</td>
<td>Below Average crop yield per USDA’s Soil Survey</td>
<td>No</td>
</tr>
<tr>
<td>2. Proximity to Urban Growth Area</td>
<td>Less than ½ mile</td>
<td>Yes</td>
</tr>
<tr>
<td>3. Predominant Parcel Size</td>
<td>Smaller than 10 acres</td>
<td>No</td>
</tr>
<tr>
<td>4. Availability of Public Facilities</td>
<td>Within 1000’ of water, sewer or paved road</td>
<td>Yes</td>
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<td>5. Tax Status</td>
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<tr>
<td>6. Availability of Public Services</td>
<td>Presents an adverse impact to ag</td>
<td>Yes</td>
</tr>
<tr>
<td>7. Land Use Settlement Patterns</td>
<td>Compatibility of land uses with ag</td>
<td>Yes</td>
</tr>
<tr>
<td>8. Intensity of Nearby Land Uses</td>
<td>Impact on ag</td>
<td>Yes</td>
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<td>9. History of Land Development</td>
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<td>No</td>
</tr>
<tr>
<td>10. Land Values under Alternative Uses</td>
<td>Assessed value indicates non-ag use</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>6</td>
</tr>
</tbody>
</table>
Change in Circumstances
The change in circumstance since the previous UGA updates is that Mt. Adams School District (MASC) has received funding for a new school, which they want to located on this proposed location. The funding will not be available during the next UGA update cycle. The Yakima County Development Regulations (Title 19) allow for schools to be sited in the Agricultural zoning district; however, the MASC wants to site the school on two properties (one of which is already in the UGA) and they would need to extent sewer services (which means the property needs to be within the UGA).

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 the Harrah’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. The Harrah 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 so that it the Mt. Adams School District can site a school on two parcels: parcel number 181135-21002, which is the proposed parcel to be included in the UGA, and parcel number 181135-21003, which is already in the UGA.

Yakima County Planning Staff is recommending de-designation recognizing the need of the community 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 Harrah UGA expansion staff report. Although it is always a conflict between the two GMA goals of protecting agricultural lands and designating the UGAs. The Planning Commission will need to make their recommendation on this issue at their deliberations.
April 17, 2019

Mr. Michael Leita, Chairman
Board of Yakima County Commissioners
128 North 2nd Street
Yakima, Washington 98901

RE: Town of Harrah – UGA Expansion Request

Dear Mr. Leita:

This letter and attachments are intended as a formal Letter of Intent to request an Emergency Comprehensive Plan Amendment to add lands to the Town of Harrah Urban Growth Area. The Town of Harrah has been contacted by the Mount Adams School District to add this land for the purpose of constructing a new K-8 school.

REQUEST
The proposal is a request for an emergency amendment to the Harrah Urban Growth Area (UGA). The application is being made by the Town on behalf of the Mount Adams School District (MASD). This proposal would add approximately 20 acres (Parcel Number 181135-21002 – see Exhibit 1) of property to the Harrah UGA. The specific request is to change the current Horizon 2040 Comprehensive Plan land use designation from Agricultural Resource to Urban Residential and the zoning from Agriculture to Single-family Residential.

STATEMENT
This application is being made to replace the existing 82-year elementary (K-6) school and construct a new K-8 school. The intent of the Mount Adams School District is to purchase the subject parcel (Parcel Number 181135-21002) along with Assessor’s Parcel Number 181135-21003 and combine them into a single approximate 35-acre parcel to accommodate the new school and ancillary uses (see Exhibit 2). Due to inconsistencies in zoning between the two properties involved in this project, it is necessary to bring the subject property into the existing Harrah UGA. It is also the intent to locate the new school within the immediate vicinity of the Town of Harrah, which offers the necessary transportation facilities, public facilities and public services.

To date, the Town and Mount Adams School District have worked cooperatively with Yakima County to determine the best path forward and have completed an EAC Meeting with county staff to discuss this proposal. At the time of this letter, the EAC Meeting notes were being drafted by county staff.
RATIONALE FOR REQUEST
Below is a brief summary of the rationale for the Comprehensive Plan Amendment request. Additional testimony will be provided during the public hearing process to further support this amendment request.

This amendment is needed for several reasons. Currently, the original Harrah School is 82 years old and needs replacement. The school was originally constructed in 1937 with additions constructed in 1954, 1959, 1977 and 1986. The MASD has spent several years looking for a replacement site because the current site is too small for a new school. This has resulted in the District needing an entirely new replacement site. During the District’s search, several properties that met the District’s criteria were identified and pursued. However, for various reasons, those sites did not result in a project site.

The District has chosen this specific location because it meets the general criteria for the new school site. The District desires to pursue this particular property because both properties needed for the total project can be merged into a single parcel, which would then be annexed into the Town of Harrah. This amendment will provide the District with a large enough parcel on which to construct a new school that will be served with the Town’s public services and facilities. It will also provide the appropriate zoning necessary to construct the school at this site.

Other factors that come into consideration are the need to have the school site constructed on deeded land and zoned properly prior to bid opening on October 1, 2019. A portion of the 27 million dollar funding, 14 million, has a drop-dead date of December 31, 2019 which is also an important factor for the project.

CONCLUSION
On behalf of the MASD, the Town of Harrah is requesting an Emergency Comprehensive Plan Amendment to include Assessor’s Parcel Number Parcel Number 181135-21002 within the Town’s UGA. For several years, the District and the Town have been working cooperatively to find a new location for a school site. It is the belief of both, that this site meets the needs and criteria of the District and the Town. Based on this, the Town is requesting that the Yakima County Board of Commissioners direct the Yakima County Planning Department to start the process for the Board to consider a Resolution granting the Emergency Comprehensive Plan Amendment for this proposal to move forward.

Thank you for your help in this request. If you have any questions, please feel free to contact me.

Sincerely,

Barbara Harrer
Mayor
Town of Harrah
TOWN OF HARRAH

CITY LIMITS

EXISTING UGA

PROPOSED UGA EXPANSION AREA
181135-21002

EXHIBIT 1
OTHER

DOCUMENTS
RESOLUTION NO. 2019-2

A RESOLUTION OF THE TOWN COUNCIL OF THE TOWN OF HARRAH SUPPORTING AN EMERGENCY APPLICATION FOR AMENDMENT OF THE URBAN GROWTH AREA BOUNDARY

WHEREAS, the Washington State Growth Management Act ("the Act"), codified as RCW 36.70A., requires counties planning under the Act to designate urban growth areas "within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature"; and

WHEREAS, the Act at RCW 36.70A.110(7) states. "An urban growth area designated in accordance with this section may include within its boundaries urban service areas or potential annexation areas designated for specific cities or towns with the county"; and

WHEREAS, the Town of Harrah regularly reviews its Urban Growth Area reviewing, economic development strategies, land use inventories and needs evaluation amendments and adjustments to its Urban Growth Areas; and

WHEREAS, the Town of Harrah recognizes circumstances presently exist that require amendment of the Urban Growth Area on an emergency basis in order to support and address community needs for educational purposes in the context of efficiently providing public services over the planning period; and

WHEREAS, the Town of Harrah has engaged in collaborative discussion with Yakima County long-term planning staff regarding the proposed urban growth area boundary amendment and this process includes a land capacity analysis, economic development planning and capital facility planning; and

WHEREAS, the Town of Harrah has engaged HLA Engineering & Land Surveying, Inc. to develop and submit cost-to-serve estimates for the proposed Urban Growth Area expansion;

WHEREAS, the proposed amendment to the Urban Growth Area is illustrated in attached map identified as "Town of Harrah -UGA Expansion Area".

WHEREAS, all costs and expenses associated with this Urban Growth Area Expansion shall be paid by the Mount Adams School District.

NOW THE BEFORE, BE IT HEREBY RESOLVED BY THE TOWN COUNCIL OF THE TOWN OF HARRAH, AS FOLLOWS:

1. Town Council for the Town of Harrah has reviewed and fully supports the planning proposals and adjustments to the Urban Growth Area set forth on the attached map and authorizes the Mayor and staff to continue efforts to secure such amendments.
2. Town Council further recognizes the significance of these long-term planning efforts and the urgency for implementation in order to facilitate and respond to immediate economic needs and educational opportunities. The immediate potential impact is significant and opportunities may be lost if the Town is unable to respond in a prompt and efficient manner.

3. Town Council notes that the request to amend the boundaries of the Urban Growth Area shall be submitted to a public participation and hearing processes before Yakima County Planning Commission and Board of County Commissioners.

4. The Town of Harrah has reviewed the proposed amendment to the Urban Growth Area and resolves to continue to support the Urban Growth Area amendment.

Passed by the Town Council and approved by the Mayor this 9th day of April 2019.

Barbara Harrer, Mayor

ATTEST:

Sarah Hovis, Town Clerk/Treasurer

APPROVED AS TO FORM:

Town Attorney, John E. Maxwell
April 17, 2019

Ms. Barbara Harrer, Mayor
Town of Harrah
P.O. Box 10
Harrah, WA 98933

Dear Mayor Harrer and Council Members:

Over the last three (3) years, the Mount Adams School District has been looking for an approximate 40-60 acre site to locate a new K-8 school in, or near, the Town of Harrah to replace the 86 year old school. This vicinity is most desirable because it is the location of the existing elementary school and the District would like to maintain its presence within the immediate area of the Town. It is also important to find a location that provides the necessary infrastructure such as transportation, public water, public sewer and fire protection which is needed for a new school. After negotiating with different property owners in the Harrah vicinity, the District has located two separate, but adjoining parcels, which can accommodate the new K-8 school. The Yakima County Assessor’s Parcel Numbers for the two parcels are 181135-21002 and 21003. A conceptual site plan has been attached which shows how the new K-8 school and necessary improvements would be constructed on the property. You will note that the school and improvements straddle a common property line between the two separate parcels. In spite of this, the District has moved forward and engaged the property owner to the point that a Purchase and Sale Agreement has been signed and accepted by both parties, subject to land use approval to construct a school. To date, the Mount Adams School District has secured adequate funding for the new school and the other improvements which total approximately $27 million.

The District has also had meetings with Yakima County to discuss the proposed location and land use issues surrounding the site. Yakima County indicates that part of the school site is located within the Town of Harrah Urban Growth Area (181135-21003) and part of the school site is located outside of the Town of Urban Growth Area (181135-21002). Under normal circumstances, simply merging the two properties into a single parcel would solve one of the land use issues associated with this project. However, the two properties are located within two different zoning districts and the Yakima County Uniform Development Code only permits like-
kind zoning districts to be merged with one another. So, under the current scenario, there is a serious zoning problem which needs to be solved.

In consultation with Yakima County, the District believes the best way to proceed with this project is to request an Emergency Comprehensive Plan Amendment from Yakima County and request that the Town of Harrah’s Urban Growth Area be expanded to include Yakima County Assessor’s Parcel Number 181135-21002. This action provides an opportunity to have both project parcels located within a similar zoning district so they can be merged into a single parcel. To take this thought further, if the Emergency Comprehensive Plan Amendment is successful, the District would also like to annex the entire school site into the Town of Harrah and complete the land use applications with the Town.

The intent of this letter is to ask the Town of Harrah to request an Emergency Comprehensive Plan Amendment from Yakima County and include Yakima County Assessor’s Parcel Number 181135-21002 within the Town’s Urban Growth Area. This request is the first step necessary to start the process of the Emergency Comprehensive Plan Amendment. The Town’s request must be in writing and presented to the Board of Yakima County Commissioners stating why the property needs to be located within the Town’s Urban Growth Area. Based on this, if you and the Town Council find this request acceptable, the District is asking that the Town draft a letter to the Board of Yakima County Commissioners and request an Emergency Comprehensive Plan Amendment to include Yakima County Assessor’s Number 181135-21002 within the Town of Harrah Urban Growth Area. This request helps ensure that the District can proceed with this project at this site.

I look forward to working with you and the Town Council through this process, if you have any questions please do not hesitate to call me at 509-874-2611.

Yours truly,

[Signature]
Curtis L. Guagnano, Ed.D
Superintendent
Mount Adams School District