



STATE OF WASHINGTON  
DEPARTMENT OF COMMERCE  
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September 2, 2021

Mr. Tua Vang  
Senior Project Planner  
Yakima County  
129 North 2nd Street  
Yakima, Washington 98901

Sent Via Electronic Mail

Re: Proposed UGA Amendment – City of Naches

Dear Mr. Vang:

Thank you for the opportunity to comment on the proposed Urban Growth Area (UGA) expansion for the City of Naches. We appreciate your coordination with our agency as you work to achieve Yakima County's vision consistent with the goals and requirements of the Growth Management Act (GMA). Please consider the following comments as you present these amendments to your appointed and elected officials.

The land quantity analysis shows that Naches currently has 54 years of growth capacity within its UGA and 66 years under the proposed expansion.<sup>1</sup> The GMA requires UGA's to be sized to accommodate 20 years of growth based on the Office of Financial Management's (OFM) population projections.<sup>2</sup> According to the staff analysis, the current and proposed UGA far exceeds the amount of land needed to accommodate 20 years of projected growth for Naches.

We encourage the County to work with the City of Naches to refine the proposal to ensure consistency with the GMA. One option is to identify property within the UGA not likely to develop over the next 20 years that could be removed in order to add land that is ready for development.

Thank you again for the opportunity to comment. If you have any questions or need technical assistance, please feel free to contact me at [scott.kuhta@commerce.wa.gov](mailto:scott.kuhta@commerce.wa.gov) or (509) 795-6884.

Sincerely,

A handwritten signature in blue ink that reads "Scott Kuhta".

Scott Kuhta  
Senior Planner  
Growth Management Services

cc: Jeff Ranger, Town Administrator  
David Andersen, AICP, Managing Director, Growth Management Services  
Ben Serr, AICP, Eastern Lead Planner, Growth Management Services  
Steve Roberge, Western Lead Planner, Growth Management Services

<sup>1</sup> Yakima County Staff Report, Table 3, Page 6 of 13

<sup>2</sup> RCW 36.70A.110