

**Yakima County
Public Services Department
Planning Division**

Emergency Amendment

**Urban Growth Area for
Town of Naches**

Staff Report

September 14, 2022

Case: LRN2021-00001/SEP2021-00010

Staff contact: Tua Vang, Senior Project Planner
tua.vang@co.yakima.wa.us, (509) 574-2300

1. Introduction

The Town of Naches has submitted a modification to their original emergency amendment request, for a land swap, to remove a 28.23-acre parcel from their urban growth area (UGA) and add three sites totaling an approximate 23.07 acres into their UGA for residential use. The previous amendment request was to add eight parcels for an approximate 40.17 acres with no proposal to remove any UGA parcels.

The Growth Management Act (GMA) requires that:

“(a) Each county that designates urban growth areas under RCW 36.70A.110 shall review, according to the schedules established in subsections (4) and (5) of this section, its designated urban growth area or areas, and the densities permitted within both the incorporated and unincorporated portions of each urban growth area. In conjunction with this review by the county, each city located within an urban growth area shall review the densities permitted within its boundaries, and the extent to which the urban growth occurring within the county has located within each city and the unincorporated portions of the urban growth areas.

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

[RCW 36.70A.130(3)]

According to RCW 36.70A.130(2)(b), a county may amend or revise its comprehensive plan whenever an emergency exists. The Town of Naches submitted their original emergency request to the Board of Yakima County Commissioners (BOCC) on March 3, 2021. No decision was made on the initial request, and on June 2, 2022, the town resubmitted a modification under this original request.

The last Urban Growth Area (UGA) periodic review and revisions, as required under RCW 36.70A.130(4), for Yakima County cities and towns were completed on December 27, 2016, to meet the June 30, 2017, deadline. The next GMA – UGA periodic review as required by RCW 36.70A.130(5) is scheduled to be completed by June 30, 2026. RCW 36.70A.130(2)(a) allows Yakima County to establish their own procedures and schedules where comprehensive plan amendments are considered by the BOCC. Yakima County's next 5-year UGA update, as

scheduled by Yakima County Code (YCC) 16B.10.040(5), was to be completed by June 30, 2022. Due to timing conflicts with the GMA review cycle and having to conduct another 5-year UGA review in 2027, the 2022 UGA update was delayed and shifted to coincide with the 2026 GMA periodic review cycle. According to RCW 36.70A.130(6)(a), “Nothing in this section precludes a county or city from conducting the review and evaluation required by this section before the deadlines established in subsections (4) and (5) of this section. Counties and cities may begin this process early and may be eligible for grants from the department, subject to available funding, if they elect to do so.”

Another timing issue was GMA’s requirement to use the Washington State Office of Financial Management’s (OFM) 20-year GMA population projections for 5-year UGA updates. The last County projections were issued on July 14, 2015, which used OFM’s 2012 data. It’s outdated and does not represent the town’s current population. OFM issues their population projections every five years. The most current OFM population projections were provided in 2017. The County’s preliminary review of this data in 2021 showed that their medium projection (the County’s preferred alternative) on average was 7,345 people less per year. The County’s results showed that using this data would highly skew their 2015 population allocations for its cities and towns, and the GMA Land Capacity Analysis (LCA) conducted in 2017, showing little to no growth for its cities and towns, and that they would have more years of growth (sufficient land for growth) than what was previously reported. In this instance, the County decided to wait to use the 2020 U.S. Census Decennial data, however, the release date was delayed. The U.S. Census is now available but OFM is not scheduled to release their projections until October 2022, using the 2020 Census as a baseline. Therefore, a simplified population projection analysis was conducted for Naches using the 2000-2020 Census decennial years as baselines to expedite the review as requested by the applicant. This review for Naches will be considered part of Yakima County’s 2026 GMA – UGA periodic review cycle for its cities and towns.

The mandates mentioned above are being met by two reports:

- a. **Report 1 – Town of Naches 2020-2040 Population Projections** Attachment 2 is the population projections analysis for the Town of Naches using the US Census Decennial data.
- b. **Report 2 – UGA Land Capacity Analysis (LCA)** identifies the current and proposed amount of (residential, commercial, community & retail, and industrial) land for each of the County’s 14 cities and towns has for future growth within their UGAs. The Land Capacity Analysis for Naches UGA is included as Attachment 3 (“UGA Land Capacity Analysis”) and is part of Yakima County’s efforts to meet its obligations under the RCWs cited above. It constitutes a recommendation to the County Planning Commission as well as the County’s initial “show-your-work” exhibit as required by the GMA.

2. Review of Urban Growth Area: Land Capacity Analysis

a. Overview

An LCA is a quantitative estimate of how much land a city or town will require as it grows over the succeeding 20-year period. It begins with a consultation between a county, its cities, and its towns to select a population growth projected from a range of projections computed by the county from data provided by OFM. As discussed above, a simplified population projection analysis was conducted for Naches using the U.S. Census Decennial data for this review only (see Attachment 2).

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

- 1) *“Land in town.”* This is used to describe lands within the town limits.
- 2) *“Land outside town.”* This is used to describe the land outside of town, within the UGA, and in county jurisdiction.
- 3) *“Land in UGA.”* This is used to describe the total areas of land inside and outside of town.

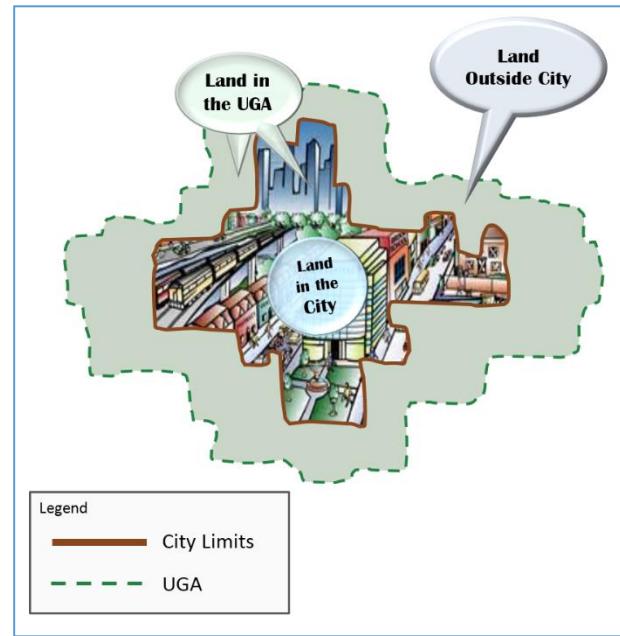
The LCA quantifies the amount of land (acreage) needed to accommodate the growth of Naches according to the analytical process (see Attachment 1) as outlined in the “Urban Lands” section in the Land Use Element of Yakima

County’s Comprehensive Plan - ***Horizon 2040***. This acreage is then compared to the amount of vacant land currently within the UGA to determine if there is a surplus or deficit for future growth to the year 2040. The general calculation is outlined as follows:

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

b. Quantity of Land Calculations for Non-Industrial Uses

Yakima County’s Geographic Information Services (GIS) division provided the current acreages of developed residential, commercial & retail, and community facilities as analyzed by the County, its cities, and its towns. The GIS division also calculates the acreages of currently vacant land and partially vacant³ land in each zoning district to arrive at the figures used in the LCA spreadsheet (Attachment 3). Unlike the other land categories, industrial lands are identified on the maps and accounted for in the LCA, however as provided by the analytical process (see Attachment 1) outlined in the “Urban Lands” section of 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.” Therefore, industrial lands are not considered in the calculation or affect the local jurisdiction’s numbers of years of growth. The data from the LCA for the current acreages is reported and depicted geographically in Attachment 4. The data from the LCA for the proposed acreages is reported and depicted geographically in Attachment 5.



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

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

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

The calculations described below and section numbering coincides with the LCA sections in Attachment 3. The spreadsheet as well as subsections 1-5 below performs the following calculations to analyze the amount of residential, commercial, and community facilities land, as well as associated streets needed to accommodate the 20-year projected population growth. Subsection 6 will analyze whether there is a surplus or deficit of land resulting with a market choice factor and number of years of growth.

1. **Population and Households Analysis:** Based on Naches' current projected population growth between 2020-2040 (Attachment 2), this analysis estimates that an additional 310 households will be added to the town's population by the year 2040. This household estimate was obtained by using the 2020 Decennial Census population number of 1,084 as reported for the Town of Naches and the decennial average growth rate of 30% from the years 2000, 2010, and 2020. Coincidentally, the town's reported population from the 2020 U.S. Census is the exact number that the County allocated in 2015 for their projected 2040 population. As shown in Attachment 2, the population of Naches has grown by 30% within the last 10 years, or 3% per year.

2040 population forecast for town (County Planning)	1,832 people
2020 population (US Decennial Data)	- 1,084 people
Population increase 2020-2040	= 748 people
Average household size (2020 Census)	÷ 2.42 people
Additional households 2020-2040	310 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:

$$8,500 \text{ sq. ft.} \times 310 \text{ households} = 2,635,000 \text{ sq. ft.} \div 43,560 \text{ sq. ft. (1 acre)} = 60 \text{ Acres}$$

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

$$748 \text{ people} \times 0.0456 \text{ acres per capita} = 34 \text{ Acres}$$

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

$$748 \text{ people} \times 0.0962 \text{ acres per capita} = 72 \text{ Acres}$$

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

Residential acreage needed	60 Acres
+Commercial/retail acreage needed	+34 Acres
+Community facilities acreage needed	+72 Acres

=Subtotal	=166 Acres
Total streets acreage needed (Subtotal x 0.15)	25 Acres

The result is a total of 191 acres of vacant land (166 acres of land and 25 acres of additional land for streets) is needed to accommodate 20 years of growth within the Town of Naches.

6. Section 6 – Land Capacity Analysis for Non-Industrial Uses: Next the land needs above are compared with the amount of existing vacant land to determine if there is a surplus or deficit of vacant land within the UGA to accommodate the projected growth through 2040.

The total amount of vacant land needed in UGA for future growth and adjusted for future street requirements (excluding industrial lands need for growth). Adding the needed acres from the land categories above results in the total acreage calculated below:

Land needed for future housing and associated streets ⁴	69 Acres
+Land needed for future commercial & retail uses and associated streets ⁴	+39 Acres
+Land needed for future community facilities and associated streets ⁴	+83 Acres
=Total vacant acres needed for future non-industrial uses⁴	= 191 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 1: Land Capacity Analysis (LCA) Summary – Excluding Industrial Zoned Land		
	Current Acreage	
Zoning Group	Land in Town	Vacant Land in UGA
Residential⁴	Deficit: -19 acres	Surplus: 5 acres
Commercial⁴	Deficit: -4 acres	Surplus: 17 acres
Community Facilities⁴	Deficit: -64 acres	Deficit: -37 acres
Zoning Groups⁴ Total	Deficit: -87 acres	Deficit: -15 acres

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

Table 2: LCA Summary – Capacity for Growth with “current” Land in Town and Land in UGA – Excluding Industrially-zoned Land	
Land in Town:	
104 (Acres of currently vacant land in town)	
- 191 (Acres needed for growth)	
= -87 (Deficit of vacant acres in town)	
Land in UGA:	
72 (Acres of currently vacant land outside the town)	
+104 (Acres of currently vacant land in town)	
-191 (Acres needed for growth)	
= -15 (Deficit of vacant acres within the Current UGA)	

⁴ Including associated streets

Computed Market Choice Factor (MCF) and “Years of Growth” (excluding Industrial growth)

One way of quantifying the surplus (or deficit) of vacant land in a town and UGA is to express the surplus (or deficit) as a percentage of the amount of vacant land that is needed for growth over the 20-year period from 2020 to 2040. For example, if a town has 120 vacant acres and needs 100 vacant acres for future growth, it has 20% more vacant land than what is needed for growth. The Computed MCF of 20%, as calculated below:

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

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

An additional way of quantifying the surplus (or deficit) of vacant land available for future growth is to express the surplus (or deficit) as the number of years it would take to develop all the vacant land at the projected future growth rate. This metric is a function of the MCF. For example, if a town has a 0% MCF as computed above, this means that the acres of vacant land are equal to the number of acres needed for growth over the 20-year period from 2020 to 2040, so it has enough land for 20 years of growth, as calculated below. In Example 2, if a town has an MCF of 100%, this means that it has twice the number of vacant acres available as are needed for 20 years of growth, so it has enough vacant land for 40 years of growth, as calculated below:

$$(\text{Computed MCF} + 1) \times 20 \text{ years} = \text{years of growth available}$$

$$\text{Example 1: } (0\% \text{ MCF} + 1) \times 20 \text{ years} = 20 \text{ years of growth available}$$

$$\text{Example 2: } (100\% \text{ MCF} + 1) \times 20 \text{ years} = (1 + 1) \times 20 \text{ years} = 40 \text{ years of growth available.}$$

Using the figures in Attachment 3, both the “MCF” and “years of growth” metrics for Naches are provided in Table 3. Based on the results, the minimal difference of an approximate 5-acre loss due to the proposed swapping of land is still reporting 18 years of growth with the current and proposed expansion of the Naches UGA.

Table 3: Naches Computed MCF and Years of Growth Available (Excluding Industrially Zoned Lands)

	Lands in the Town	Lands Outside Town	Growth within Current UGA	Growth within Proposed UGA
Computed MCF	-46%	N/A	-8%	-10%
Years of growth available	11 years	7 years	18 years	18 years

7. Future Industrial Land Needs

Naches is not proposing any industrial lands to be added. The GIS analysis provides the current acreages of industrially-zoned lands (Attachment 3).

Table 4: Existing Industrial-Zoned Lands	Acreage
Current developed industrially-zoned land in town	99 Acre
Current developed industrially-zoned land outside town	32 Acres
Current vacant industrially-zoned land in town	1 Acre
Current vacant industrially-zoned land outside town	12 Acres
Industrial acres to add to UGA	0 Acres
Industrial acres to remove from UGA	0 Acres

3. Review of Densities Permitted in the UGA

In addition to reviewing Naches' UGA, RCW 36.70A.130(3)(a) requires Yakima County to review the densities permitted within both the incorporated and unincorporated portions of the UGA. On the low end of the density range in the residential zoning districts, the following will illustrate the potential minimum density of the existing vacant land in town and land outside of town. Assuming that an average County lot size of 8,500 square feet or 5.1 dwellings per acre and 7,200 square feet for the Town of Naches and no requirements to develop to maximum density, it is unlikely that the residential land within the Naches UGA will develop to the maximum density.

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

The residential zoning districts and corresponding densities are as follows:

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

Yakima County UGA in the Urban Growth Area (Yakima County Code Title 19 Unified Land Development Code)		
Zoning District	Minimum Lot Size	Density
R-1 (Single-Family Residential)	4,000 – 10,000 sq. ft. (depending on use) 7,000 sq. ft. for single-family residence	7 units per acre
R/ELDP-40 (Remote/Extremely Limited Development Potential)	40 or legally described as 1/16 of a section	1 unit per 40 acres

There are currently 49.69 acres of vacant Residential zoned lands in the Town of Naches and 23.83 acres of vacant land outside of town. A total of 19.61 acres are in the “Floodplain Constrained” category; 14.96 acres are lands in town and 4.65 acres are lands outside of town. The Floodplain Constrained means “new lots entirely in the floodplain shall be at least one (1) acre in area” per YCC 16D.03.27(3)(b)(iv). See section 4 “*Town/County Collaboration*” and subsection 5(1)(c) “*Major Rezone and Plan Amendment Review Criteria*” below for more information on floodplain-constrained areas based on the YCC subdivision guidelines. Although this County provision has no bearing on the town’s subdivision guidelines, the town’s code under section 16.16.080 entitled “*Disapproval Due to Flood, Inundation or Swamp Conditions*” states that:

“Pursuant to RCW 58.17 as it now exists or is hereafter amended, the planning commission shall consider the physical characteristics of the proposed subdivision site and may recommend disapproval of a proposed plat because of flood inundation or swamp conditions. Construction of protective improvements may be required as a condition of approval and such improvements shall be noted in the final plat or in the planning commission’s recommendation.”

Therefore, it is uncertain how the town would address density in these areas. However, this analysis will assume that there is some density potential and will apply the County’s one-acre minimum for a density of unit per acre for the 14.96 acres of vacant land in town for a total of 15 dwelling units per acre. The County will also consider 4 more dwelling units with the 4.65 acres of vacant Floodplain Constrained land outside of town. The GIS division reports 2 acres of vacant “R/ELDP-40 Constrained” land outside of town. This category allows for a maximum density of 1 unit per 40 acres. There are currently 9 vacant lots (all various acreages but less than 40 acres) and one partially developed lot under this category. In the LCA analysis, a maximum lot size of 0.20 acres or a density of 5.1 dwelling units per acre was applied to them. Since none of these lots can no longer be divided, there is a potential for 10 dwelling units. This leaves 34.73 acres within the Town of Naches and a potential for 210 dwelling units at 7,200 square feet each. As for the remaining 17.18 County acres of vacant residential land outside of town, there is a potential of 88 dwelling units at 8,500 square feet each. The table below is a summary of the potential density discussed and the total number of dwelling units with the existing vacant land in the Naches UGA if developed at the low end of the maximum density range.

Naches UGA Density		
Vacant Land Category	Acres	Potential No. of Dwelling Units
Floodplain Constrained in Town	14.96	15
Floodplain Constrained Outside of Town	4.65	4
Residential Land Outside Town (R/ELDP-40)	2	10
Residential Land in Town (7,200 sq. ft./unit)	34.73	210
Residential Land Outside Town (8,500 sq. ft/unit)	17.18	88
Total	73.52	327

4. Town/County Collaboration

County staff met with Jeff Ranger, Town Administrator, on May 14, 2021, to review the town’s original emergency request. Mr. Ranger informed staff that the school was showing interest in parcel 171403-22015 for a future expansion and requested that the LCA zoning group be changed

from residential to community facilities. He also requested that the county review the development potential of lands south of the highway within the shoreline jurisdiction of the Naches River.

After a careful review of the County's development standards, County staff applied YCC subsections 19.34.050(5)(a)(vi)(B) "Subdivision" standards and YCC 16D.03.27(3)(b)(iv) "General Critical Areas Protective Measures" standards and applied the lot size restrictions to the LCA calculations. These sections of the code state, "new lots entirely within the floodplain shall be at least one (1) acre in area." For example, a two-acre parcel that is entirely covered in the floodplain can only be divided down to two lots, one-acre minimums. Previously, the County did not consider these restrictions and applied the 8,500 square foot minimum to all vacant lots within the floodplain. The benefits of applying this restriction are for consistency with YCC subdivision guidelines and to accurately reflect the town's vacant land density capacity. In this instance, it showed that the town actually had less vacant land and therefore reducing the number of years of growth. See Attachment 4 for "Residential Floodplain Constrained" areas and acreage.

On June 2, 2022, the Town of Naches submitted a modification request to their original proposal under the BOCC's Resolution 085-2021. This staff report is analyzed and addressed this modification request.

5. Major Rezone and Plan Amendment Review Criteria

YCC 19.36.040 states 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 rezones completed as part of the plan amendment process shall be reviewed against the criteria as for plan amendments in Section 16B.10.095. And 16B.10.095 provides the following approval criteria for proposed amendments to Yakima County's Comprehensive Plan – **Horizon 2040**:

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

(a) The proposed amendment is consistent with the Growth Management Act and requirements, the Yakima County Comprehensive Plan, the Yakima Urban Area Comprehensive Plan and applicable sub-area plans, applicable city comprehensive plans, applicable capital facilities plans and official population growth forecasts and allocations;

Findings: The proposed amendment is consistent with the UGA review criteria and procedural requirements of the County's Comprehensive Plan – **Horizon 2040**, YCC Title 19, GMA, current population growth forecast, and the Town of Naches Capital Facilities Addendum.

(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: There are overwhelming circumstances that the site is more consistent with the criteria for the proposed map designation than the criteria for the existing map designation.

1. The property owner intends to develop the property and the Town of Naches is showing support to provide public utilities to these lots.
2. Parcels 171403-42004 and 171403-42023 have ceased orchard agricultural production since 2013 based on aerial images.

3. Based on the County's LCA guidelines, parcel 171403-42005 is less than one acre and has more than \$10,000 in assessed improvements. Therefore, this lot is considered developed and will not count against the Town's years of growth.
4. The subject parcels are adjacent to the Town of Naches and the lots within the UGA are zoned Single-Family Residential (R-1).

(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: See the above finding for suitability. The Town of Naches' written request, dated March 3, 2021, for consideration of an emergency amendment to their UGA, stated that the town "does not have any residential zoned developable properties available." According to Naches' request letter, the town is currently under contract for a \$1.5 million dollar wastewater improvement project and coordinating with the U.S. Department of Agriculture for \$4.3 million dollar second phase improvements to serve these sites.

The narrative of the June 2, 2022 modification request (Attachment 6) further reiterates that the "town's lack of developable residential land has become even more acute since the public hearing" [on February 15, 2022]. Furthermore, "as of the date of this request, the town has yet to issue any residential building permits for year 2022." The town has completed the \$1.8 million dollar phase 1 upgrade to its wastewater system. Phase 2 will begin in the fall of 2022. The town states that they have been growing in an easterly/southeasterly direction to include several annexations with Clemans View Park, Allan Brothers, and their H2A housing facilities.

The town has considered other parcels. They point out that the school district has purchased the large vacant General Commercial zoned lot (parcel 171403-34008) and the adjacent city lot to the west. The commercial lot is touching the large subject lot (parcel 171403-42023) that is proposed to be added to the UGA. The town's proposed land swap is also referencing a letter received from the State of Washington Department of Commerce (Commerce). However, the letter clearly states that the town's current and proposed years of growth exceeds GMA's 20-year requirement. The letter also requires the town to work with the County to ensure consistency by removing land that is not likely to be developed within the next 20 years, and add land that is ready. Based on the current Naches population projection, the newest LCA shows that the town is at 18 years of growth and under GMA's requirement.

In addition, a review of the available vacant and partially developed residential lots within Naches' UGA has determined that the variable lot sizes are unsuitable for infill development since the large lots are still being used for AG production to include the lack of public utilities and road infrastructure to serve these sites.

Lastly, the lots south of the highway have environmental, floodplain, and minimum lot size constraints. Attachment 4 shows the areas identified and categorized as "Environmentally Constrained," "Residential Floodplain Constrained," and "Residential-R/ELDP Constrained." The environmentally constrained lots cannot be developed due to the Floodway/Channel Migration Zone (CMZ) and taken out of the equation for vacant land. The floodplain constrained means "new lots

entirely in the floodplain shall be at least one (1) acre in area" per YCC 16D.03.27(3)(b)(iv). Furthermore, the Residential-R/ELDP or the Remote/Extremely Limited Development Potential-40 zoning district has a 40-acre minimum lot size. All of these lots are less than 40 acres and are no longer divisible, whether they are vacant or partially developed. For zoning code consistency and LCA calculations, a maximum lot size of 0.20 acres was applied to each of these lots. An improvement greater than or equal to \$10,000 on any of these lots would make them fully developed.

The lots in the floodplain and R/ELDP-40 were previously grouped into a general residential zoning group in the LCA and given maximum consideration for the potential division of land down to 8,500 square feet minimum lot sizes. This overinflated the actual available vacant residential land and the number of years of growth. As a result, the Naches LCA (Attachment 3) has been adjusted for environmental, floodplain, and minimum lot size restrictions to ensure consistency with YCC Titles 19 and 16D.

(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 residential land into the UGA, except the town's request letters highlighting the lack of residential land for development; town's growth patterns; and support of investments to ensure public wastewater systems are available to serve these sites.

(e) To change a resource designation, the policy plan map amendment must be found to do one of the following:

- (i) Respond to a substantial change in conditions beyond the property owner's control applicable to the area within which the subject property lies; or*
- (ii) Better implement applicable comprehensive plan policies than the current map designation; or*
- (iii) Correct an obvious mapping error; or*
- (iv) Address an identified deficiency in the plan. In the case of Resource Lands, the applicable de-designation criteria in the mapping criteria portion of the land use subchapter of Yakima County Comprehensive Plan, Volume 1, Chapter I, shall be followed. If the result of the analysis shows that the applicable de-designation criteria has been met, then it will be considered conclusive evidence that one of the four criteria in paragraph (e) has been met. The de-designation criteria are not intended for and shall not be applicable when resource lands are proposed for redesignation to another Economic Resource land use designation;*

Findings: This proposal has been reviewed with the Agricultural Resource De-Designation Analytical Process criteria (Attachment 7) and did not obtain a score in favor of de-designating the agricultural resource lands. However, there are supporting arguments in favor of de-designation to consider under "Changes in Circumstances" and "Final Determinations" sections of the attachment. The proposed lot to be removed (parcel 171403-22015) was also reviewed under the **Horizon 2040** Agricultural Resource (AR) Designation Mapping Criteria

(Attachment 8) and has met the criteria to be designated AR with a concurrent rezone to the Agriculture (AG) zoning district.

(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, sewer, and public roads are less than 1,000 feet away from the subject sites. As discussed in subsection (c) above, the town is under contract and seeking interagency funding for additional wastewater improvements. As required by YCC 16B.10.095 for UGA amendments, the Town of Naches has submitted an official addendum to their capital facilities plan that adequate facilities and services will be made available to these sites (Attachment 9). Other town public facilities and services available include Fire District #3, Fire Station 16, sheriff, the Naches Library, and Naches Valley School District.

(g) *The proposed policy plan map amendment will not prematurely cause the need for nor increase the pressure for additional policy plan map amendments in the surrounding area.*

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

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

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

(a) *Land Supply:*

- (i) *The amount of buildable land suitable for residential and local commercial development within the incorporated and the unincorporated portions of the Urban Growth Areas will accommodate the adopted population allocation and density targets;*
- (ii) *The amount of buildable land suitable for purposes other than residential and local commercial development within the incorporated and the unincorporated portions of the Urban Growth Areas will accommodate the adopted forecasted urban development density targets within the succeeding twenty-year period;*
- (iii) *The Planning Division will use the definition of buildable land in YCC 16B.02.045, the criteria established in RCW 36.70A.110 and .130, and applicable criteria in the Comprehensive Plan and development regulations;*
- (iv) *The Urban Growth Area boundary incorporates the amount of land determined to be appropriate by the County to support the population density targets;*

(b) *Utilities and services:*

- (i) *The provision of urban services for the Urban Growth Area is prescribed, and funding responsibilities delineated, in conformity with the comprehensive plan, including applicable capital facilities, utilities, and transportation elements, of the municipality;*

(ii) *Designated Ag. resource lands, except for mineral resource lands that will be reclaimed for urban uses, may not be included within the UGA unless it is shown that there are no practicable alternatives and the lands meet the de-designation criteria set forth in the comprehensive plan.*

Findings: Yakima County staff analysis above supports the conclusion that this proposal is consistent with the above criteria.

(3) *Land added to or removed from Urban Growth Areas shall be given appropriate policy plan map designation and zoning by Yakima County, consistent with adopted comprehensive plan(s).*

Findings: Land will be classified according to Yakima County's UGA future land use designation and zoning (see Attachment 10).

(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 modification request is not creating any new impacts that haven't already been reviewed as part of the SEPA analysis (file # SEP2021-00010) and issued a Final Determination of Non-significance on October 22, 2021.

(5) *Plan policy and other text amendments including capital facilities plans must be consistent with the GMA, SMA, CWPP, other comprehensive plan goals and policies, and, where applicable, city comprehensive plans and adopted inter-local agreements.*

Findings: Not applicable. The changes to the Naches UGA are map amendments rather than policy or text amendments.

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

Findings: Not applicable. The changes to the Naches UGA are map amendments rather than policy or text amendments.

6. Conclusions

- a. The Town of Naches is proposing to remove a 28.23 residential zoned lot (parcel 171403-22015) in orchard production from the UGA and add three non-farmed lots (parcels 171403-42004, -42005, and -42023) totaling 23.07 acres into their UGA for residential use.
- b. The property owner of the three subject parcels is interested in developing his properties and does not have any intentions of conducting commercial agriculture.
- c. The Town of Naches supports the addition of these properties and have made investments to its wastewater system.
- d. The required town's capital facilities addendum submittal shows that adequate roads, water and sewer utilities will be provided to these sites.
- e. The three subject parcels have been reviewed under the Agricultural Resource (AR) de-designation criteria of **Horizon 2040**, and have not met the criteria for de-designation.

- f. The subject parcel to be removed has been reviewed under the Agricultural Resource Mapping Criteria and has met the requirements to be designated as Agricultural Resource (AR).
- g. The three subject parcels are adjacent to the town limits and UGA. The town parcels are in residential use and if approved, they would not be inconsistent or conflict with the current uses.
- h. Based on the Naches LCA, the town's current and proposed amendment would remain at 18 years of growth and under GMA's 20-year growth requirement.

7. Staff Recommendation

Therefore, Yakima County planning staff recommends **APPROVAL** of the Town of Naches proposed Emergency UGA modification as outlined in the Table below: (Map showing each area is included in Attachment 10.)

Naches Proposal						
Parcel No(s)	Add to UGA	Current Land Use Designation	Current Zone	Proposed Land Use Designation	Proposed Zone	County Planning Recommendation
171403-42004	7.4	Agricultural Resource (AR)	Agriculture (AG)	Urban Residential (UR)	Single-Family Residential (R-1)	Approve
171403-42005	0.33	Agricultural Resource (AR)	Agriculture (AG)	Urban Residential (UR)	Single-Family Residential (R-1)	Approve
171403-42023	15.34	Agricultural Resource (AR)	Agriculture (AG)	Urban Residential (UR)	Single-Family Residential (R-1)	Approve
171403-22015	28.23	Urban Residential (UR)	Single-Family Residential (R-1)	Agricultural Resource (AR)	Agriculture (AG)	Approve

Attachments:

1. **Horizon 2040**'s Description of the Analytical Process for the UGA Land Capacity Analysis
2. County's 20-Year Population Projection for Naches
3. UGA Land Capacity Analysis (Spreadsheet)
4. Existing Naches UGA Analysis 2022 (GIS Map & Report)
5. Proposed Naches UGA Analysis 2022 (GIS Map & Report)
6. Town of Naches Emergency UGA Modification Request
7. Agricultural Resource De-Designation Analytical Process
8. Agricultural Resource Designation Mapping Criteria
9. Town of Naches Capital Facilities Addendum
10. Naches Proposed Plan Designations and Zoning Map

5.8.1 Urban Lands Sub-Element Purpose

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

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

5.8.2 Urban Lands - Growth Management Act Requirements

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

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

5.8.3 Urban Lands – Urban Growth Areas

General Description Urban lands are the areas located within UGA boundaries, which are established by the County in consultation with the cities and towns. In general, each of Yakima County's UGA's includes one of Yakima County's fourteen cities and towns plus additional area extending beyond the city or town. Since the cities have historically developed in the valley floors, they tend to be surrounded by irrigated agriculture, and are likely to include geologically hazardous areas, wetlands and other wildlife habitat, or river gravels suitable for mining. "Urban growth" means that land is used so intensively for buildings, structures, and impermeable surfaces that viable agriculture, forestry or mining is not feasible. Urban governmental services are either available, or could be provided without excessive public cost. Urban

governmental services typically include water and sewer systems, street cleaning services, fire and police protection services, and public transit services. Based on their respective comprehensive, subarea or neighborhood plans, cities and other service providers must be able to demonstrate both ability and willingness to supply designated urban areas with these services within the twenty-year planning period. The Growth Management Act, RCW 58.17

5.8.3.1 Urban Growth Area Designation Process

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

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

In unincorporated areas within UGA boundaries, Horizon 2040 establishes several urban land use designations to implement the Growth Management Act's Planning Goal 1: "Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner." In determining areas to be set aside for future urbanization, the County and cities mutually endorsed a County-Wide Planning Policy. It states that areas designated for urban growth should be determined by preferred development patterns, residential densities, and the capacity and willingness of the community to provide urban governmental services.

UGAs are intended to include land that is characterized by urban growth or will be needed for urbanization, consistent with forecasted population growth and the ability to extend urban services. UGA boundaries are intended to establish the areas within which incorporated cities and towns may grow and annex over the next twenty years. Yakima County's UGAs are also intended to implement Washington Administrative Code, which states that "the physical area within which that jurisdiction's vision of urban development can be realized over the next twenty years." The process for which Urban Growth Areas are designated is outlined below:

- **Population Allocation**

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

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

- **Land Capacity Analysis**

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

1. Determine how much housing is necessary for 20 years of growth.

Subtract the City's current year population from the projected 20 year population figure to determine the additional number that represents 20 years of growth. Based on a city's average household size, calculate the number of additional dwelling units to allow for.

2. Determine the necessary residential acreage.

Determine the desired and appropriate housing densities in collaboration with the cities. Calculate how many acres are needed to accommodate the number of new dwelling units based on the desired and appropriate densities. A percentage can be added to allow for market choice and location preference.

3. Determine the necessary commercial and retail acreage.

Divide the existing commercial and retail acreage by the current population to arrive at a commercial/retail acreage per capita figure. Multiply this per capita number by the additional population identified in Step #1. This will give you the amount of additional commercial/retail acreage needed. A percentage can be added to allow for market choice and location preference.

4. Determine the net amount of total additional acreage needed for non-industrial uses.

Determine the currently available undeveloped acreage within the existing UGA for both residential and commercial/retail. Subtract these figures from the acreage identified in Steps # 2 and #3 to determine if acreage is needed for UGA expansion for residential or commercial/retail. Factor in additional acreage needed for open space, critical areas, parks, and other public facilities such as schools and libraries based on appropriate level of service standards. Add appropriate acreage to allow for streets.

5. Identify areas needed for Industrial zoning.

Industrial zoning is based on the city's economic development strategy and is not contingent on future population.

6. Identify areas that are desired and appropriate for expansion.

Identify the areas desired for UGA expansion based on the amount of acreage needed as identified in Steps #4 and #5. Ensure the requisite acreage is accurately allocated to residential, commercial/retail,

and industrial. Areas desired for expansion should avoid Agricultural and Mineral Resource areas if possible. If Resource areas are unavoidable, justification for encroaching into the Resource area will be required.

7. Capital Facilities Plan.

Approval of any UGA expansion by Yakima County will be subject to adoption of an adequate and appropriate Capital Facilities Plan by the respective elected legislative body to ensure necessary facilities and services will be provided to the entire expanded UGA within the 20 year period. All capital and public facilities needed for future growth must be included in the Capital Facilities Plan. These needed facilities may be identified in comprehensive plan elements, in the jurisdiction's functional plans, or in the plans of other entities that provide services or facilities.

• Mapping Criteria for New UGA areas:

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

Attachment 2

NACHES 20-YEAR POPULATION PROJECTION (2020-2040)

Town of Naches, WA Dicennial Average Growth Rate %		
Year	Census Population	Growth Rate % Change
2000	643	
2010	795	23.64%
2020	1,084	36.35%
(20 Year) Dicennial Average Growth Rate %		30.00%

Town of Naches, WA 2020-2040 Population Projection			
Year	Census Population	Growth Rate % Change	Population Estimate
2020	1,084		
2030		30.00%	1,409
2040		30.00%	1,832

Source: Population Decennial Census Series 1890-2020 (Decennial Census Counts of Population for the State, Counties, Cities and Towns)

		Units	Naches Current w/ Env. Constraints 9-14-2022	Naches Proposed Modification w/ Env. Constraints 9-14-2022
UGA Land Capacity Analysis				
1 - Population and Households Analysis				
a	2040 population for City (Projection within medium range)	people	1,832	1,832
b	2020 Decennial Census population in City	people	1,084	1,084
c	City's projected population increase, 2020-2040 (a - b)	people	748	748
d	City's average household size (2020 Census)	people per household	2.42	2.42
e	Additional households projected for City, 2020-2040 (c + d)	households	310	310
2 - Future Residential Land Need				
f	Desired average density of future housing, 2020-2040 (5.1 dwelling units per acre)	sq. ft. per dwelling unit	8,500	8,500
g	Land needed for future housing (e • f ÷ 43,560 sq. ft. per acre)	acres	60	60
3 - Future Commercial & Retail Land Need				
h	Current developed commercial & retail land in City (from GIS analysis)	acres	49	49
i	Current developed commercial & retail land in City per person (h ÷ b)	acres per person	0.0456	0.0456
j	Land needed for future commercial & retail (i • c)	acres	34	34
4 - Future Community Facilities* Land Need				
k	Current developed community facilities land in City (from GIS analysis)	acres	104	104
m	Current developed community facilities land in City per person (k ÷ b)	acres per person	0.0962	0.0962
n	Land needed for future community facilities (m • c)	acres	72	72
5 - Future Streets Land Need				
p	Subtotal of land needed for future residential, commercial & retail, and community facilities (g + j + n)	acres	166	166
q	Land needed for future streets (p • 15%)	acres	25	25
6 - Land Capacity Analysis				
Residentially-zoned capacity				
r	Current vacant residentially-zoned land in City (from GIS analysis)	acres	50	50
s	(minus) Land needed for future housing and associated streets (-g • 115%)	acres	(69)	(69)
t	= Surplus (Deficit) of vacant residentially-zoned land in City (r + s)	acres	(19)	(19)
u	Current vacant residentially-zoned land outside City (from GIS analysis)	acres	24	47
v	(plus) Surplus (Deficit) of vacant residentially-zoned land in City (t)	acres	(19)	(19)
w	= Surplus (Deficit) of vacant residentially-zoned land in UGA (u + v)	acres	5	28
Commercially-zoned capacity				
x	Current vacant commercially-zoned land in City (from GIS analysis)	acres	35	35
y	(minus) Land needed for future commercial & retail and associated streets (-j • 115%)	acres	(39)	(39)
z	= Surplus (Deficit) of vacant commercially-zoned land in City (x + y)	acres	(4)	(4)
aa	Current vacant commercially-zoned land outside City (from GIS analysis)	acres	21	21
bb	(plus) Surplus (Deficit) of vacant commercially-zoned land in City (z)	acres	(4)	(4)
cc	= Surplus (Deficit) of vacant commercially-zoned land in UGA (aa + bb)	acres	17	17
Community Facilities capacity				
dd	Current vacant community facilities land in City (from GIS analysis)	acres	19	19
ee	(minus) Land needed for future community facilities and associated streets (-n • 115%)	acres	(83)	(83)
ff	= Surplus (Deficit) of vacant community facilities in City (dd + ee)	acres	(64)	(64)
gg	Current vacant community facilities land outside City (from GIS analysis)	acres	27	0
hh	(plus) Surplus (Deficit) of vacant community facilities land in City (ff)	acres	(64)	(64)
ii	= Surplus (Deficit) of vacant community facilities land in UGA (gg + hh)	acres	(37)	(64)
Capacity for growth in City (excluding Industrial growth)				
jj	Surplus (Deficit) of vacant land for residential, commercial, community facilities, & streets (t + z + ff)	acres	(87)	(87)
kk	Computed Market Choice Factor in City (MCF)**	%	-46%	-46%
mm	Years of growth available in City ((kk + 1) • 20)	years	11	11
Capacity for growth outside City (excluding Industrial growth)				
nn	Years of growth available outside City (rr - mm)	years	7	7
Capacity for growth in UGA (excluding Industrial growth)				
pp	Surplus (Deficit) of vacant land for residential, commercial, community facilities, & streets (w + cc + ii)	acres	(15)	(19)
qq	Computed Market Choice Factor in UGA (MCF)***	%	-8%	-10%
rr	Years of growth available in UGA ((qq + 1) • 20)	years	18	18
7 - Future Industrial Land Need				
ss	Current developed industrially-zoned land in City (from GIS analysis)	acres	96	96
tt	Current developed industrially-zoned land outside City (from GIS analysis)	acres	32	32
uu	Current vacant industrially-zoned land in City (from GIS analysis)	acres	1	1
vv	Current vacant industrially-zoned land outside City (from GIS analysis)	acres	12	12
ww	Industrial acres to add to UGA (based on City's economic development strategy)	acres	0	0
xx	Industrial acres to remove from UGA (based on City's economic development strategy)	acres	0	0

*Community Facilities such as parks, schools, libraries, city halls, fire stations, churches

**(vacant acres in City ÷ needed acres) - 1 = (r + x + dd) ÷ (s - y - ee) - 1

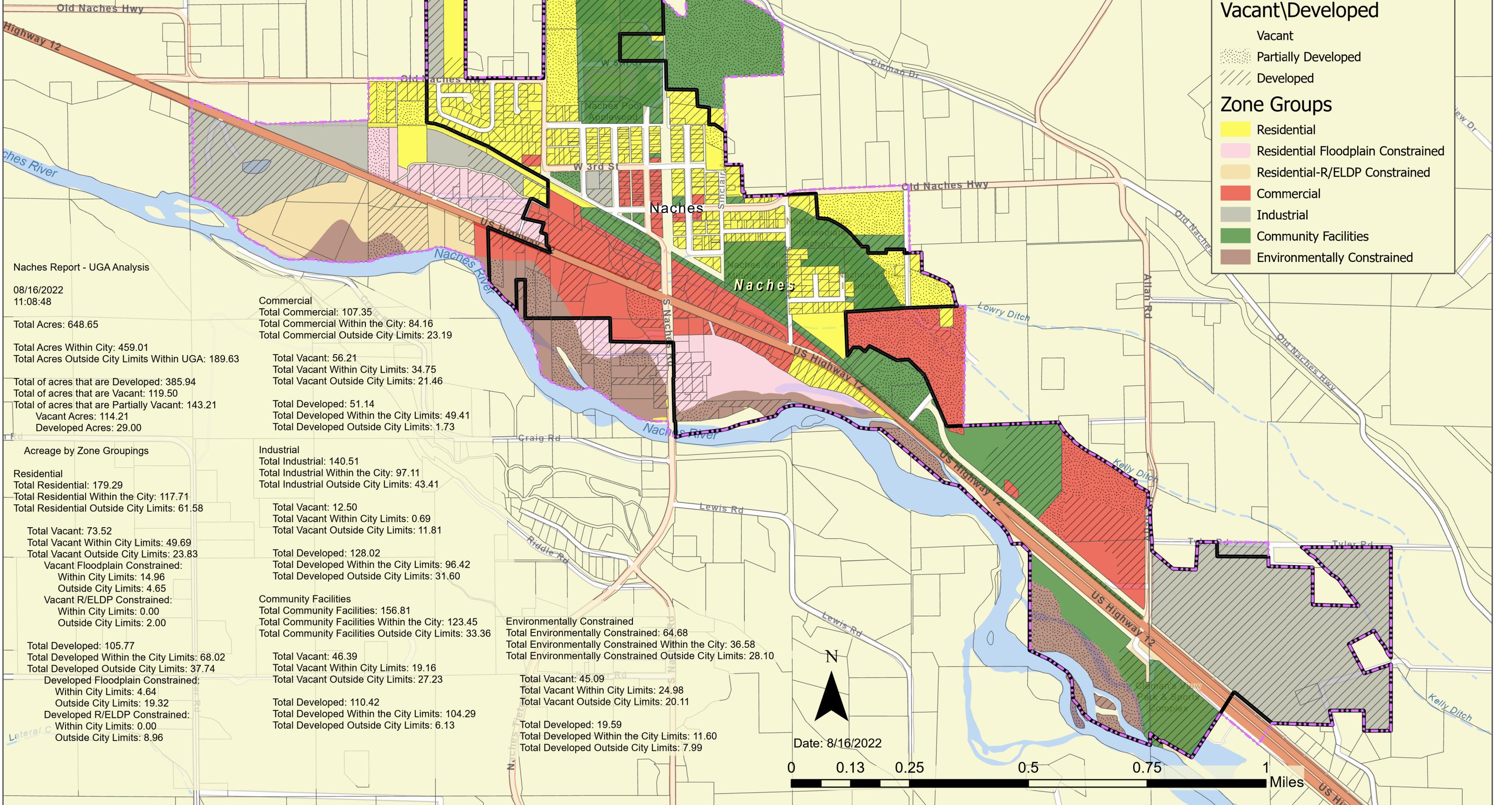
***(vacant acres in UGA ÷ needed acres) - 1 = (r + u + x + aa + dd + gg) ÷ (s - y - ee) - 1

Note: numbers in parentheses are negative

City of Naches

Existing

UGA Analysis 2022



June 2, 2022

Re: Town of Naches' Revised Requests to Amend
Naches' Urban Growth Area
Case: LRN 2021-0001/SEP 2021-0010

Raymond G. Alexander
Alan D. Campbell++
J. Jay Carroll
Paul C. Dempsey**
James S. Elliott
Robert N. Faber
F. Joe Falk, Jr.+
Mark E. Fickes
Carter L. Fjeld+
Frederick N. Halverson~
Lawrence E. Martin*
Terry C. Schmalz+
Linda A. Sellers
Michael F. Shinn
Stephen R. Winfree+

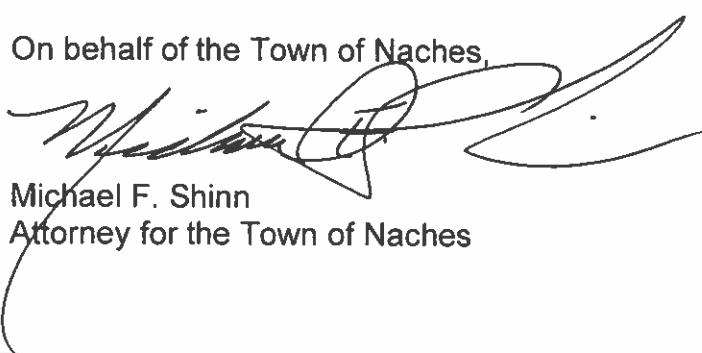
*Also OR Bar Member
**Also State Bar of CA Member
+Of Counsel
~Honorary/Retired
++Retired

To Whom It May Concern:

On behalf of the Town of Naches, its Staff and its land use consultant, Bill Hordan, we are submitting a revised proposal to Amend the Town's Urban Growth Area so as to add 23.66 acres (Yakima County Assessor's Parcel Nos. 171403-42004, 171403-42005 and 171403-42023) while simultaneously removing 28.23 acres (Yakima County Assessor's Parcel No. 171403-22015) from the UGA. While effecting a net reduction in the UGA, the proposal removes property historically put to agricultural use for the sake of adding property which has not been farmed for at least a dozen years and whose owner attests that there is no reasonable likelihood that it will ever become agricultural land, again. In other words, the proposal is to add 23.66 acres to the UGA which does not have long term commercial significance for commercial agriculture.

The Town submits this revised application under the auspices of the previously adopted, and continuing Resolution 085-2021, in which the Board of Yakima County Commissioners found that there exists with regard to the Town of Naches an emergency within the meaning of RCW 36.70A.130(2)(b) insofar as the Town lacked vacant, developable, residential land within in its Town limits and existing UGA. As noted in the revised application, the emergency has become even more acute since the public hearing held on February 15, 2022. The Town is prepared to acknowledge that the application, as revised, may constitute a material modification requiring remand to the Yakima County Planning Commission for further review and comment, but because the emergency has not abated, the Town urges that its revised application be scheduled for such review and comment as expeditiously as possible.

On behalf of the Town of Naches,



Michael F. Shinn
Attorney for the Town of Naches

halversonNW.com

HALVERSON | NORTHWEST LAW GROUP P.C.

Yakima Office: 405 E. Lincoln Avenue | PO Box 22550 | Yakima, WA 98907 | p) 509.248.6030 | f) 509.453.6880

Sunnyside Office: 910 Franklin Avenue, Suite 1 | PO Box 210 | Sunnyside, WA 98944 | p) 509.837.5302 | f) 509.837.2465

The Town of Naches continues to operate in an emergency situation within the meaning of RCW 36.70A.130(2)(b), with no viable opportunity to accommodate residential growth within its existing Town Limits or Urban Growth Boundary. Based on this scenario, the Town desires to amend its current unresolved UGA application to better address the emergent needs of the community under the jointly adopted *Master Interlocal Agreement for Growth Management Act Implementation in Yakima County*. The below proposal is intended to alleviate the emergency and incorporate new lands into the UGA specifically for residential development.

On March 30, 2021, the Board of Yakima County Commissioners adopted Resolution Number 085-2021 (SEE EXHIBIT 1) which, in short, recited that the Board declared an emergency and instructed the Yakima County Planning Division to assess the residential needs of the Town and initiate consideration of the Town of Naches' request as soon as possible.

The Town, in consultation with the Yakima County Planning staff, created a formal request to expand the UGA and presented the request to the Yakima County Planning Commission. The formal request included expansion of the UGA near the northwest corner and southeast corners of the existing UGA. The Planning Commission held public hearings to consider the formal request. During the hearing process, the County Planning staff determined that the Town of Naches has a 20-acre deficiency in lands designated Residential. This fact came to light after close review indicated that a large area of the Town Limits/UGA was within the 100-year floodplain of the Naches River and that there were very few large parcels within the Town Limits/UGA to accommodate residential growth.

After testimony and deliberations were completed, the Planning Commission "recommended" to the Yakima Board of County Commissioners that the proposed expansion near the northwest corner of the UGA be approved. The request in the southeast corner of the UGA was forwarded to the Yakima County Board of Commissioners with "no recommendation" due to a lack of majority quorum vote based on Yakima County Planning Commission "Rules of Procedures".

Almost a year after the March 30, 2021 emergency Resolution 085-2021, on February 15, 2022, the Board of Yakima County Commissioners entertained a public hearing on the recommendation of the Yakima County Planning Commission. At the start of the hearing, the Town withdrew the request to include the proposed expansion near the northwest corner of the UGA. The Town's intent from the very beginning of this process was to include lands near the southeast corner of the UGA because of the new infrastructure improvements underway in that area. Based on this revision to the request, the Town made a presentation to the Board which addressed the benefits of including the southeastern area within the UGA and how it would alleviate the residential housing emergency.

After testimony was heard from the public, the hearing was closed, the Chairman indicating that deliberations and a decision would be forthcoming at a later date. The date for further consideration was set as March 22, 2022. On that date, no deliberations occurred nor was any motion made. Thus, the application was not acted upon. In short, there has been no resolution of the Town's application and the emergency for which Resolution 085-2021 was adopted still persists.

The Town's lack of developable residential land has become even more acute since the public hearing. As of the date of this amended request, the Town has yet to issue any residential building permits for year 2022. The last single-family residential permit was issued in December of 2021. The Naches School District has purchased two parcels near the southeast corner of the Town (SEE EXHIBIT 2 – EMAIL & MAP) which might have previously been considered available for residential development. Specifically, one parcel is 21.09 acres in size, designated Commercial and lies within the existing UGA (171403-34008). The other parcel is 4.19 acres, lies within the Town Limits, and is designated and zoned Multi-family Residential (171403-34007). Since the properties are being used for educational purposes, the purchase of these two properties by the School District eliminates the opportunity to remove one of the properties from a Commercial designation and change it to a Residential designation. The other property is presently zoned and designated for Multi-family residential and is permanently being removed from the Town's residential land inventory, which further reduces the residential lands within the Town Limits/UGA.

During this emergency amendment process, a comment letter was received from Scott Kuhta, Senior Planner, with the Washington State Department of Commerce. Mr. Kuhta identified a possible resolution to the emergency, where the Town would identify property currently within the existing UGA but not likely to develop over the next 20 years. He suggested that property not likely to develop in the next 20 years be removed from the existing UGA in order to add land that is ready for development. A copy of Mr. Kuhta's letter is attached as EXHIBIT 3. Faced with a no growth residential option, the Town desires to pursue this suggestion to solve its residential lands emergency.

Based on the information above the Town desires to amend its current application and continue to pursue those properties originally included near the southeast corner of the UGA. It is now the Town's desire to remove land not ready for development from the existing UGA, in exchange for property currently outside its UGA, that is ready for development and alleviate the residential land use emergency.

Specifically, the Town proposes to remove an existing 28.23 acre parcel (Yakima County Assessor's Parcel Number 171403-22015) designated Residential from the Town UGA's in exchange for three parcels totaling 23.66 acres (Yakima County Assessor's Parcel Numbers 171403-42004, 171403-42005 & 171403-42023) with the intent of designating all three parcels Residential (SEE EXHIBIT 4). A review of the current Yakima County Future Land Use Map indicates that Yakima County Assessor's Parcel Number 171403-22015 is most likely to be designated Agriculture based on the surrounding land use pattern and the current use of the property which is used for orchard and alfalfa (SEE EXHIBIT 5). In this instance, the proposal would slightly reduce the size of the Town's UGA but would add residential property ready for development which is needed, while excluding active agricultural property not ready for development.

Previously, the Town submitted a Capital Facilities Plan Addendum which indicates that the Town has the capability of serving the three parcels proposed to be added to the UGA (SEE EXHIBIT 6). Additionally, the Town recently completed a \$1.8 million dollar upgrade to its waste water treatment plant (Phase 1) and has worked with USDA to fund a \$4.3 million dollar

upgrade for Phase 2 improvements, with construction to begin in the Fall of 2022. To help defray the costs of these waste water improvements, the Town relies on sewer service fees and hook-ups. Residential development is a vital component in establishing these fees and hook-ups. The Town is also in the process of applying for TIB matching money and other monies to extend Kel-Lowry Road, northerly, from Bonlow Drive to the Old Naches Highway. This transportation route will also include domestic water and waste water pipeline routes.

The Town of Naches has been growing in an east/southeast direction for many years. That growth has included several annexations which include Clemans View Park, Allan Bros. office, warehouse and their H2A housing facilities. Bonlow Drive has been constructed and includes water and sewer lines that are ready to be extended to serve this new area of the UGA. The Naches School District has recently constructed a K-4 grade school with frontage on Bonlow Drive. This area of Town is so convenient for the grade school and Naches School District patrons, that the school district has purchased additional abutting lands in anticipation of future educational growth. Unfortunately, as previously indicated in a letter from the Naches School District, the District's enrollment has been declining and the school administration believes that the lack of housing is a contributing factor (SEE EXHIBIT 7). Along with this recent growth has come the improvement of the Naches Valley Trail that connects with the Yakima Greenway, antique-style lighting, landscaping and a lighted read-a-board welcoming the traveling public to the Town of Naches. Clemans View Park was recently outfitted with a Park and Ride and an electric vehicle charging station. The Naches Event Center (located at Clemans View Park) operated by the Town of Naches, received a capital budget grant to upgrade the venue building and park's tennis courts. An additional capital budget grant was awarded in 2022 for a portable concert stage for community events at the park. All of these improvements are located near the southeast corner of the existing town Limits/UGA

As the area described above has developed, properties lying to the north are the next logical location for urban growth to occur. The land is generally flat and can easily accommodate residential growth. This northerly direction of growth also provides for the connection of looped water mains, easy utility line extensions and transportation connections. It is imperative that urban utilities and transportation facilities be designed together, so as to reduce the public cost of installing these improvements, as contemplated by the Growth Management Act. The combination of these services/facilities are most necessary and desirable for urban growth. This proposal demonstrates that contiguous urban growth makes good use of the existing utility services and the existing transportation network. It also prevents sprawl and provides the necessary infrastructure required for proposed properties to be added to the UGA.

The intent of the Washington State Growth Management Act is not to limit urban growth but to encourage well planned growth utilizing best practices, while meeting the goals and policies of the Act. The Town of Naches believes this application accomplishes this goal.

Attachment 7

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

The “Quantitative Analytical Process” of the Agricultural (AG) Resource De-designation Analytical Process is found in the Land Use subchapter of **Horizon 2040**, Chapter 5.10.3, immediately following the mapping criteria for Agricultural Resource Areas. Adopted in 2017, Mapping Criterion #7 states the purpose of the De-designation Analytical Process as follows:

“The agricultural resource de-designation criteria will be used for plan amendments and updates to change a land use from Agricultural Resource to another land use designation.”

The analytical process considers 10 variables listed in WAC 190-365-050 that could adversely impact commercial agriculture. These variables are considered in light of the state’s Growth Management Act (GMA) goal to protect AG land of long-term commercial significance. When *“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”* (**Horizon 2040**, Land Use Element Chapter 5, page 56).

“Commercial agricultural purposes” means the use of farm and agricultural land on a continuous and regular basis, prior to and subsequent to application for classification or reclassification, that demonstrates that the owner or lessee is engaged in and intends to obtain through lawful means, a monetary profit from cash income by producing an agricultural product. (WAC 458-30-200)

The 10 factors in **Horizon 2040** are quoted below *in italics*, followed by the **Staff’s Analysis**.

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:

464 to 330 bu/ac crop yield	0 points [Lowest]
598 to 465 bu/ac crop yield	1 point [Below Average]
732 to 599 bu/ac crop yield	2 points [Average]
866 to 733 bu/ac crop yield	3 points [Above Average]
1000 to 867 bu/ac crop yield	4 points [Highest]

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

Staff Analysis: This first criterion only focuses on analyzing the productivity of soils in relation to the highest yielding crop (irrigated apples) measured by bushels per acre (bu/ac). If the soil results are between a “below average” to “highest” crop yield score, the answer to this criterion would be having “no” impact to agriculture because the soils are productive. If a “lowest” crop yield score is obtained, the answer would be a “yes,” an impact to agriculture because the soils are not in a productive class, yielding little to no crops, and in favor of de-designating from agriculture.

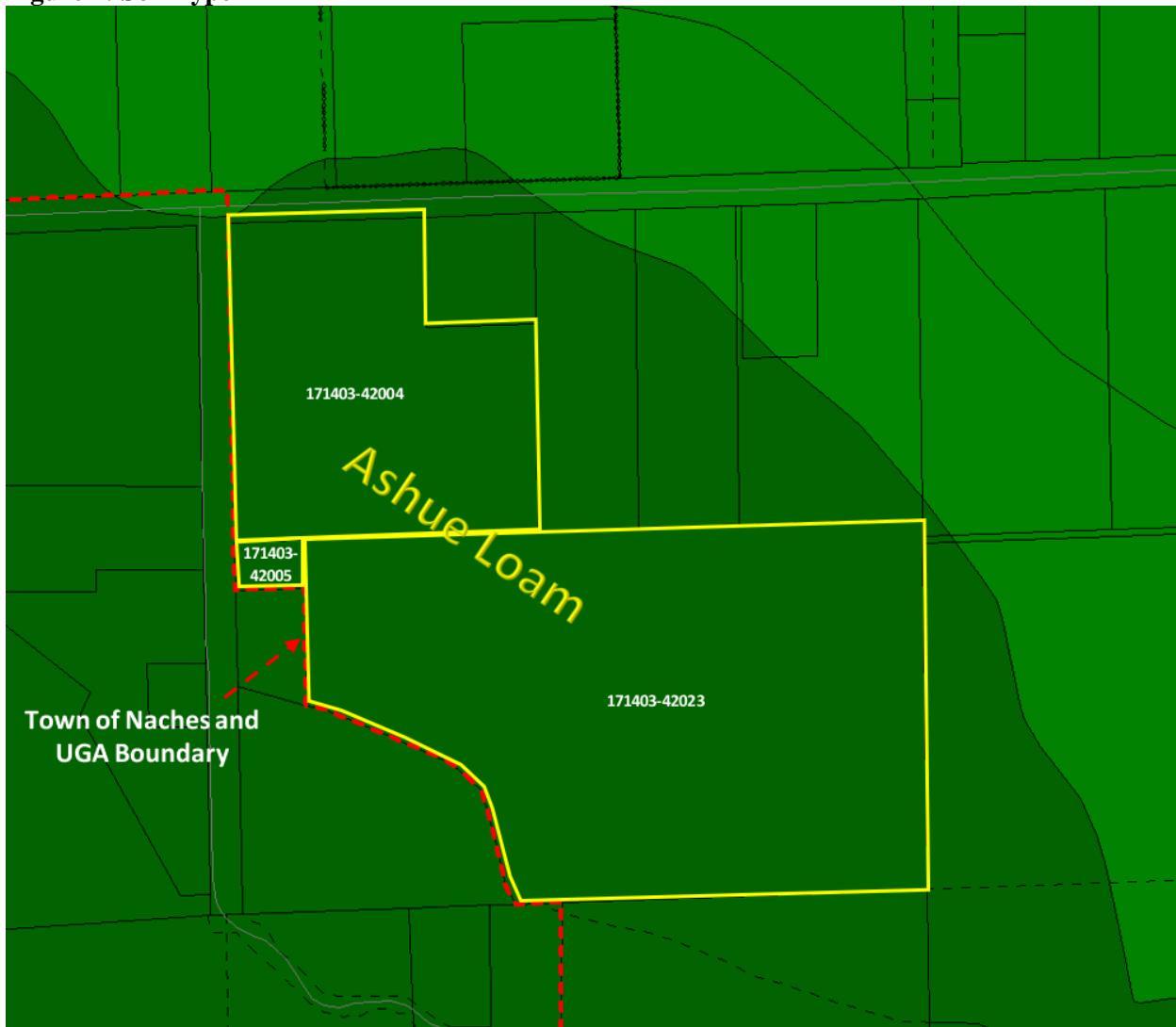
According to the U.S. Department of Agriculture’s “*Soil Survey of Yakima County Area Washington*” (*Soil Survey*):

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

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

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

Figure 1: Soil Type



Parcel Nos. 171403-42004, 171403-42005, and 171403-42023 (AG Zoning District)

Soil Type	bu/ac crop yield	Points
Ashue loam	Irrigated Apples, 735 bu/ac	2 points [Average]

Variable	Review Criteria	Impact to AG - Yes or No
1. Soil	Average crop yield per Soil Survey	No

As reported by Yakima County GIS, Ashue loam is considered “Prime Farmland if Irrigated.” The soil on these parcels scored an “average” crop yield rating and therefore results in a “no” impact to commercial agriculture and “not in favor” of de-designation.

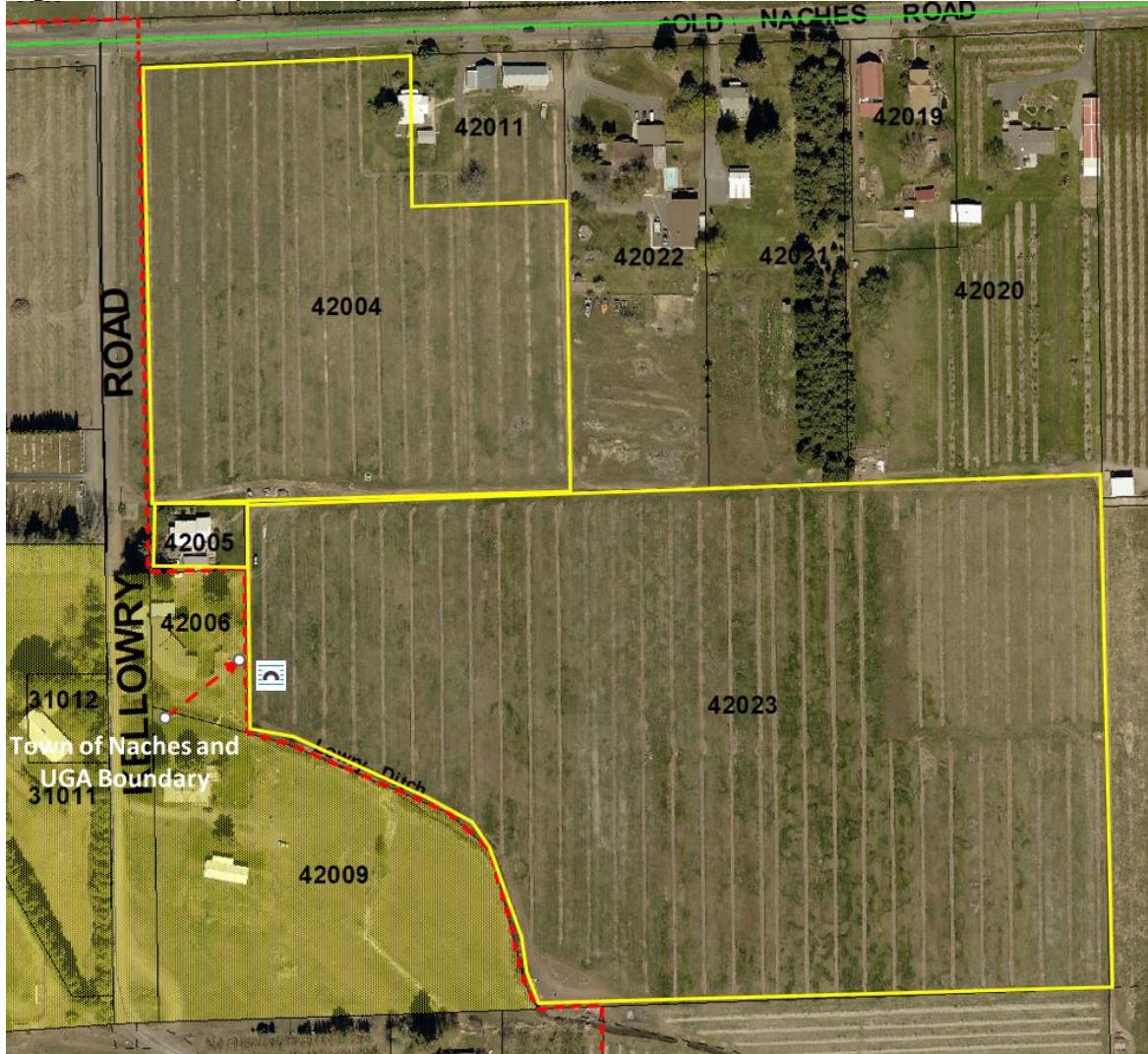
2. Proximity to the Urban Growth Area

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 $\frac{1}{4}$ mile of the UGA
 Between $\frac{1}{4}$ and $\frac{1}{2}$ mile
 Between $\frac{1}{2}$ mile and 1 mile
 Between 1 mile and 2 miles
 Greater than 2 miles from UGA

0 points [Lowest]
 1 point [Below Average]
 2 points [Average]
 3 points [Above Average]
 4 points [Highest]

Figure 2: Proximity to UGA



Variable	Review Criteria	Impact to AG - Yes or No
2. Proximity to Urban Growth Area	Less than $\frac{1}{2}$ mile	Yes

Staff Analysis: As shown in the image above, all of the subject parcels are adjacent to the Naches UGA and/or touching the town limits. Based on the scoring criteria, these parcels would result in 0 Points [lowest] and a “yes” impact to commercial agriculture “in favor” of de-designation due to their location.

3. Predominant Parcel Size

Larger parcels are thought to be more suitable for commercial agriculture. Smaller parcels have a greater pressure to develop as a residential lot or some other higher use. Parcels under contiguous ownership,

while certainly having an effect on the probability for commercial agriculture, ought not be considered during the five-year update process due to the inherent fluidity of property ownership. Contiguous ownership, however, should be a consideration when evaluating property for possible removal from a resource area during the amendment review process. Parcels were assigned a numeric value, with higher values for agriculture given to larger parcels as follows:

Less than 5 acres	0 points [Lowest]
Between 5 and 10 acres	1 point [Below Average]
Between 10 and 20 acres	2 points [Average]
Between 20 and 40 acres	3 points [Above Average]
Greater than 40 acres	4 points [Highest]

Parcel No(s)	Acres	Points
171403-42004	7.4	1 [Below Average]
171403-42005	0.33	0 [Lowest]
171403-42023	15.34	2 [Average]

Variable	Review Criteria	Impact to AG - Yes or No
3. Predominant Parcel Size	Smaller than 10 acres (Parcels 171403-42004 and 171403-42005)	Yes
	Between 10 and 20 acres (Parcel 171403-42023)	No

Staff Analysis: Based on the results in the tables above, parcel 171403-42023 receives an “average” score and results in a “no” impact to commercial agriculture and “not in favor” of de-designation due to its large size. Parcels 171403-42004 and -42005 receives a “below average” and “lowest” scoring which results in a “yes” impact to commercial agriculture and “in favor” of de-designation due to their small sizes. Parcel 171403-42005 is also fully built out and contains a residence and garage.

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.

Variable	Review Criteria	Impact to AG - Yes or No
4. Availability of Public Facilities	Within 1,000’ of water, sewer, or paved road	Yes

Staff Analysis: The subject parcels are not served by public water or sewer utilities. However, all of the parcels are within a reasonable distance of 1,000 feet to these services and meet this criterion. The

availability of these public facilities indicates a “yes” impact to commercial agriculture and “in favor” of de-designation.

5. 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.

Variable	Review Criteria	Impact to AG - Yes or No
5. Availability of Public Services	Presents an adverse impact to AG	Yes

Staff Analysis: The subject parcels are located adjacent to the Town of Naches. The parcels are approximately less than one mile from Naches Fire Station 16, library (Naches Library - Yakima Valley Libraries), Naches Valley School District, and within Yakima County Fire District #3 and Sheriff jurisdiction. The availability of public services presents a “yes” impact to commercial agriculture and “in favor” of de-designation.

6. & 7. 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.

Figure 3: Intensity of Nearby Uses and their Compatibility with Agriculture Practices

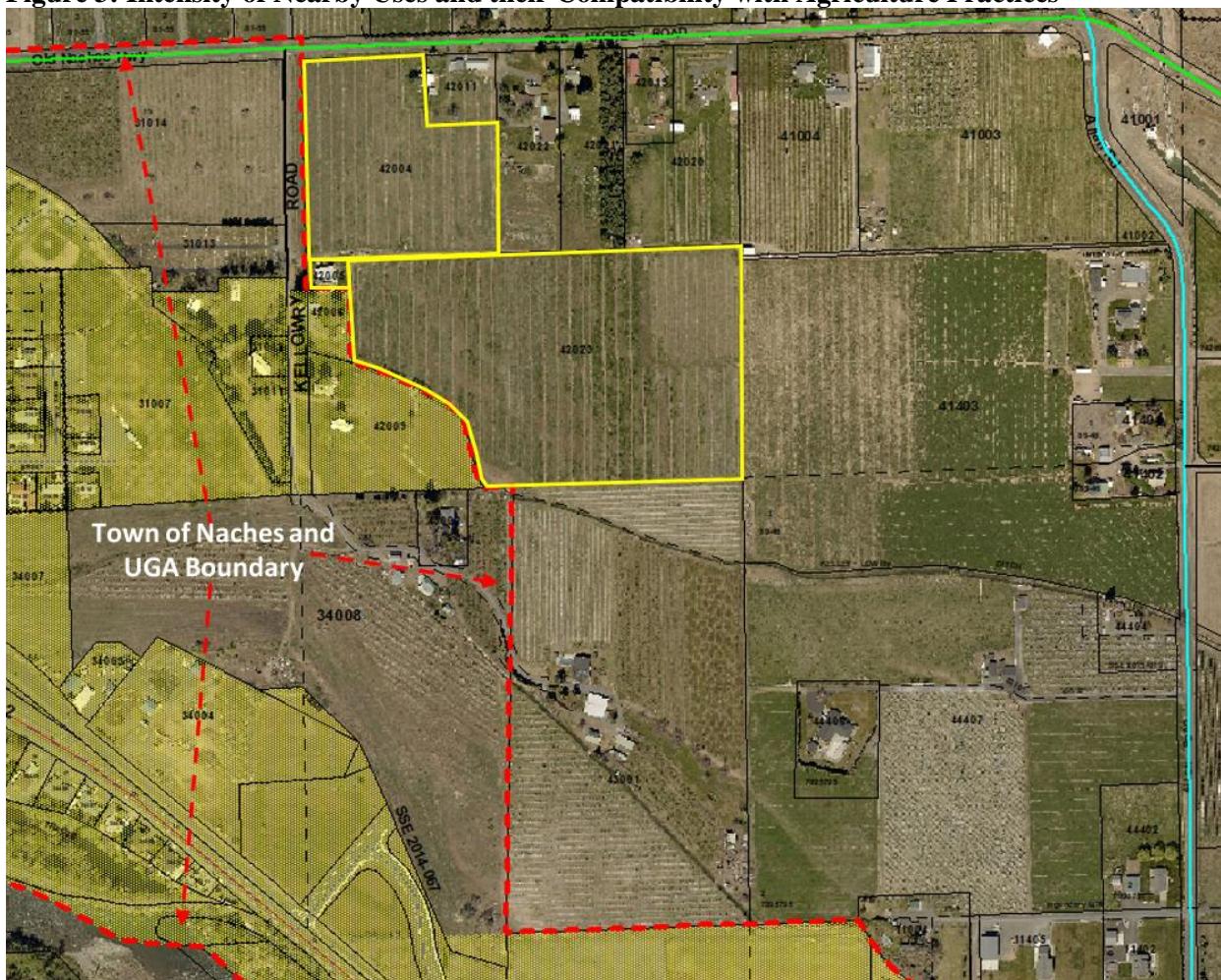
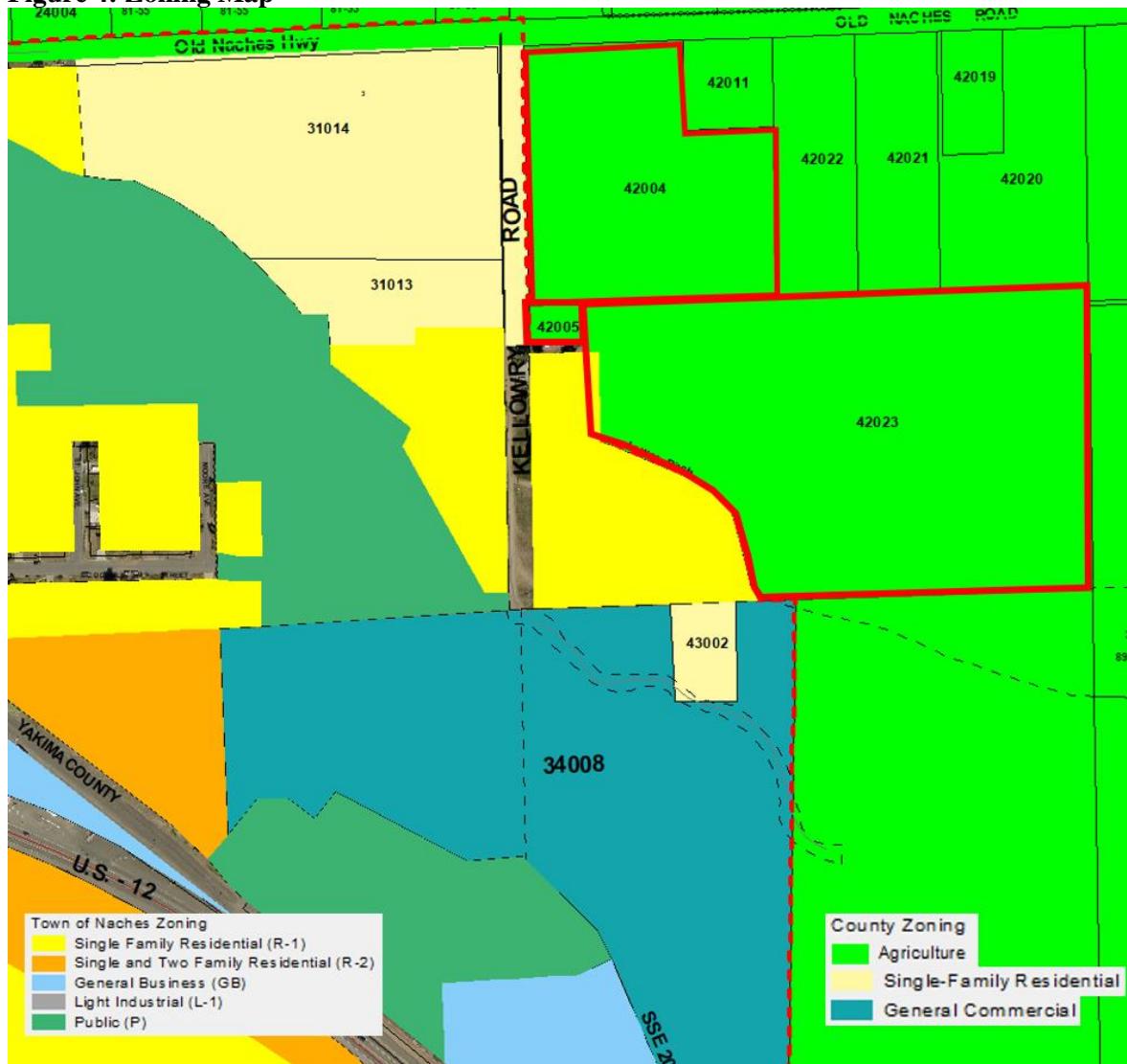


Figure 4: Zoning Map



Variable	Review Criteria	Impact to AG - Yes or No
6. Land Use Settlement Patterns	Impact on AG	Yes

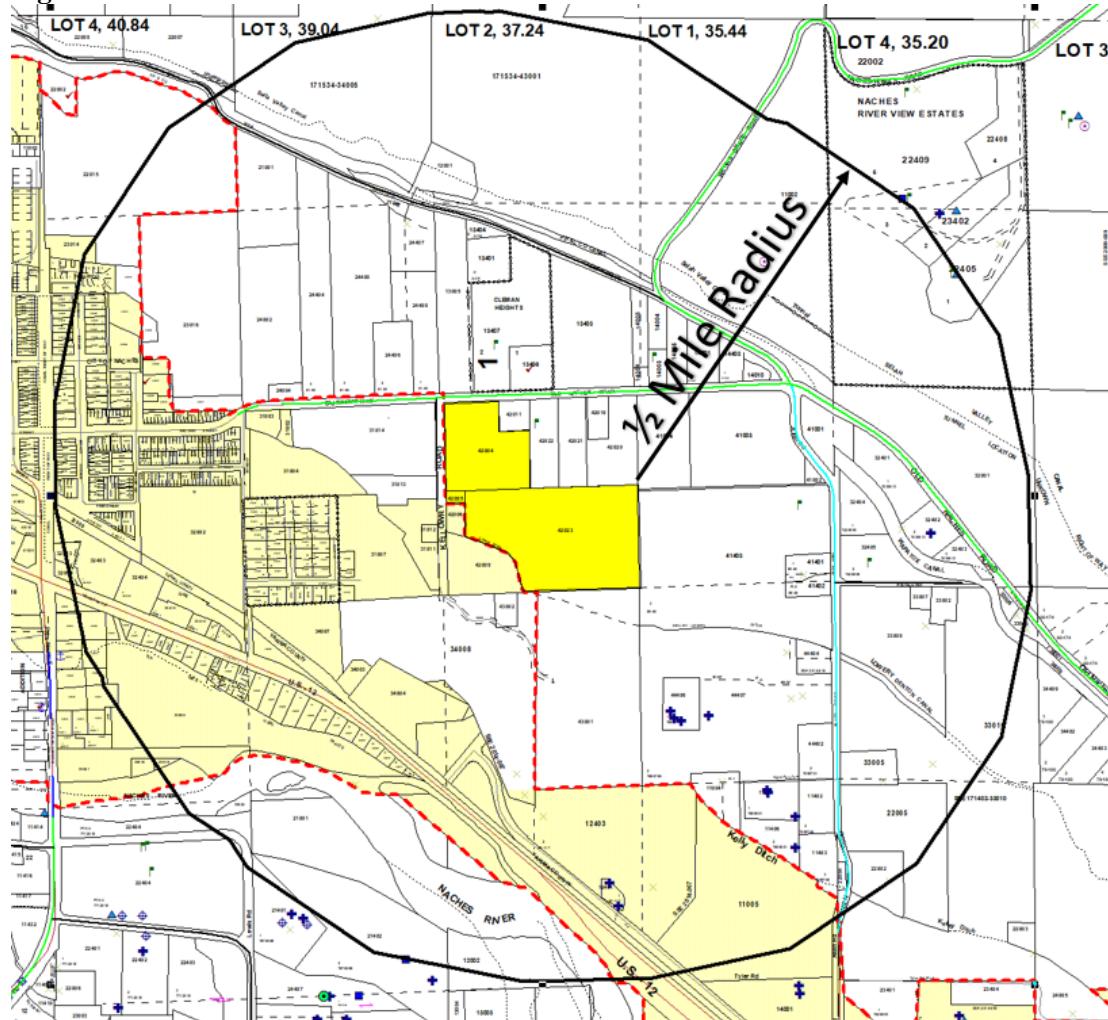
Variable	Review Criteria	Impact to AG - Yes or No
7. Intensity of Nearby Land Uses	Impact on AG	Yes

Staff Analysis: As shown in Figure 3: Intensity of Nearby Uses, there is a mixed-use of adjacent rural and town parcels that range in sizes between 1.78 to 27.10 acres and contain residences or are vacant. The larger residential and vacant lots are being used for either personal or commercial agricultural production. Figure 4 is a zoning map that shows the different types of nearby and adjacent land uses to the subject properties. Directly southwest of parcel 171403-42023 is a 21.09-acre parcel zoned General Commercial in the Naches UGA. This would indicate that both the current land use settlement patterns and intensity of land uses will increase and ultimately generate a “yes” impact to commercial agriculture and “in favor” of de-designation.

8. 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.

Figure 5: Subdivision Permits within 1/2 Mile



Permit Notices and Planning History

+

SUB

- 1: Permit Notices and Planning History - SUB15-033
- 2: Permit Notices and Planning History - SUB2015-00033
- 3: Permit Notices and Planning History - SUB15-067
- 4: Permit Notices and Planning History - SUB2015-00067
- 5: Permit Notices and Planning History - SUB15-035
- 6: Permit Notices and Planning History - SUB2015-00035
- 7: Permit Notices and Planning History - PA252-96
- 8: Permit Notices and Planning History - 7090750
- 9: Permit Notices and Planning History - SP93-117
- 10: Permit Notices and Planning History - PA65-93
- 11: Permit Notices and Planning History - 7030613

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

Staff Analysis: According to the County's GIS Planning History (Figure 5), there has not been more than 15 County subdivision permits within a half-mile radius of the subject parcels. Some of the cases in the table are duplicates (umbrella case numbers), associated preliminary decisions, and their recorded short plat maps.

9. 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 or Long-term Commercial Significance, but may be another indicator of the possibility of a more intense use of the land. When the majority of the parcels within the study area have a tax status other than Agriculture, then it is considered one factor for possible removal of the area from resource designation.

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

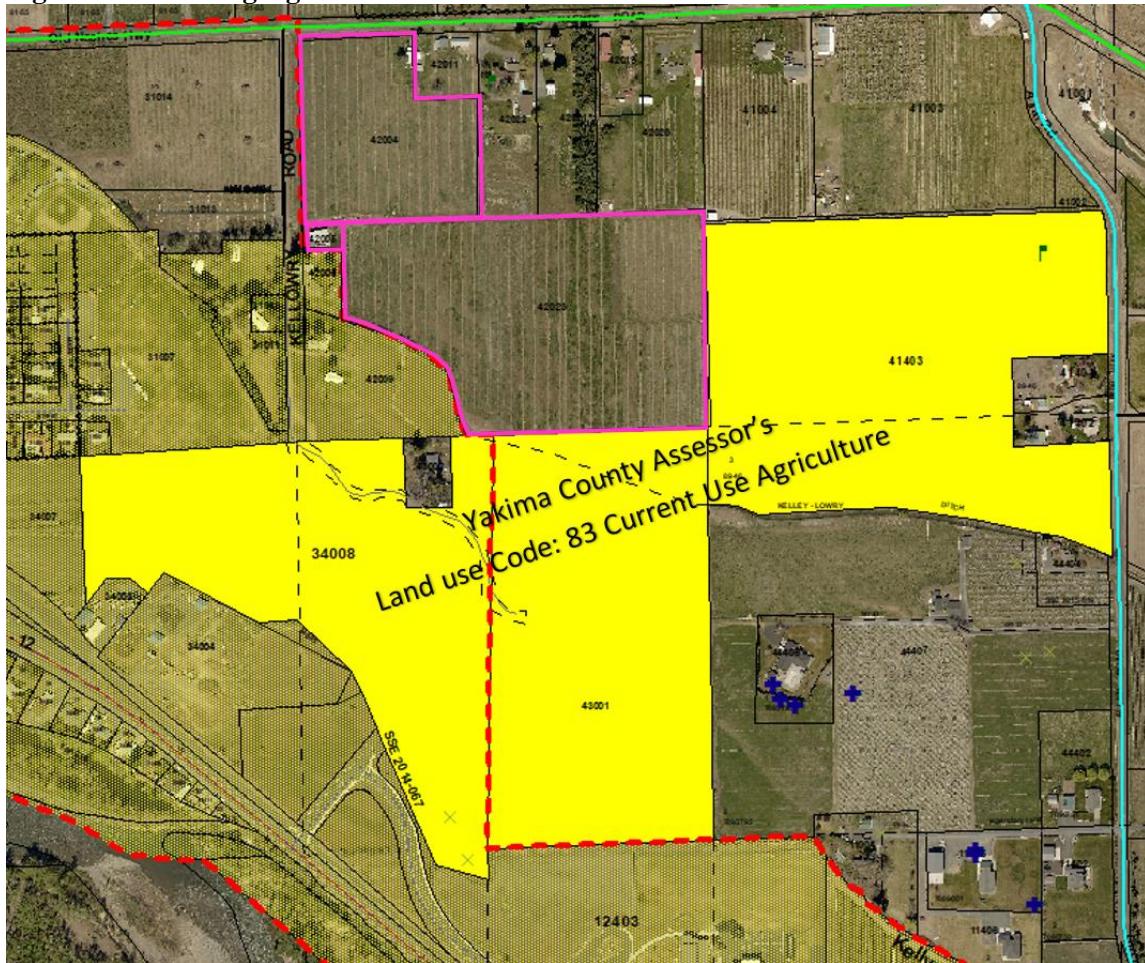
Variable	Review Criteria	Impact to AG - Yes or No
9. Tax Status	Predominance of a tax status other than AG	Yes

Staff Analysis: None of the parcels are assessed as Agricultural "current use." This indicates a "yes" impact to commercial agriculture and "in favor" of de-designation.

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.

Figure 6: Prevailing Agricultural Rate



Variable	Review Criteria	Impact to AG - Yes or No
10. Land Values under Alternative Uses	Assessed value indicates non-AG use	No Decision for or against.

Staff Analysis: As stated above in de-designation criterion #9 “Tax Status,” the three subject parcels to be added are not being taxed as “Agriculture Current Use,” under the Washington State Open Space Taxation Act. However, the three parcels highlighted in yellow in Figure 6 out of the 16 adjacent parcels are designated as “current use” agriculture by the Yakima County Assessor. The smallest residential parcel is 0.68 acres in size. The largest residential parcel with minimal agriculture is 5.96 acres in size. A cemetery is on a 2.02-acre parcel. The smaller parcels equate to roughly 81% of all the parcels and are being assessed at a higher rate. However, the opposing view may consider the size of the larger parcels and designated “current use” agricultural parcels. They are approximately 69.86 acres compared to the 51.44 acres of the small lots. Even though parcel 171403-34008 is zoned General Commercial as discussed in criteria 6 & 7 above, there are minimal to no restrictions from using it for commercial agricultural production. Since this criterion has too many variables for and against de-designation, no decision can be made as to whether there will be an impact to commercial agriculture.

11. Final Assessment

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

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

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

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

When using this basic analytical process for a county-wide or area-wide review, and the answer to whether or not a variable has an effect on commercial agriculture is "yes," the number of "yes" answers must reach a total of eight before the determination can be made that the impacts are overwhelming and significant to the point where the property can no longer be considered agricultural land of long term commercial significance.

Staff Analysis: This proposal is not a county-wide or area-wide proposal to de-designate agricultural lands. It is only intended to de-designate three AG parcels, approximately 23.07 acres in size that are adjacent to the UGA and proposed for residential use.

As seen in the de-designation criteria summary below, all of the AG parcels proposed to be added have not obtained the required number of "yeses," (8 or higher) in favor of removing these parcels from AG land of long term commercial significance.

Variable	Review Criteria	Impact to AG - Yes or No
1. Soil	Average crop yield per USDA's Soil Survey	No
2. Proximity to Urban Growth Area	Less than ½ mile	Yes
3. Predominant Parcel Size	Smaller than 10 acres	Yes to 171403-42004 & 171403-42005 No to 171403-42023
4. Availability of Public Facilities	Within 1000' of water, sewer, or paved road	Yes
5. Availability of Public Services	Presents an adverse impact to AG	Yes
6. Land Use Settlement Patterns	Compatibility of land uses with AG	Yes

7. Intensity of Nearby Land Uses	Impact on AG	Yes
8. History of Land Development	15 or more subdivisions within ½ mile	No
9. Tax Status	Predominance of a tax status other than AG	Yes
10. Land Values under Alternative Uses	Assessed value indicates non-AG use	No Decision
Parcels 171403-42004 & 171403-42005	Total	7
Parcel 171403-4023	Total	6

Change in Circumstances

Mr. John Diener owns the three subject parcels proposed for de-designation. The change in circumstances since the previous UGA update are as follows:

Mr. Diener intends to develop his properties. He appeared at the Board of Yakima County Commissioners hearing on February 15, 2022 for the Town of Naches' original expansion request and provided such testimony.

The Town of Naches has stated that they are growing in an easterly/southeasterly direction and Mr. Diener's properties are in the path of growth and development. Both the town's original and modified UGA expansion requests have repeatedly stated that they are in need of residential land. In result, the town is showing support by approving a required Capital Facilities Addendum to their Capital Facilities Element of their comprehensive plan, and that they will provide and seek funding for public roads, water, and sewer to serve to these properties.

More importantly, it has only been seven years since the County issued their 2015 population projections and allocations to its cities and towns. When the Town of Naches' 2040 population projection is compared to the 2020 U.S. Census Decennial data, the town's projected population of 1,084 has already been obtained or increased by 254 people. A new population projection was conducted using the last three decennial baselines, and as calculated in the Land Capacity Analysis shows 18 years of growth with a deficit of 15 acres in the overall UGA, and below GMA's 20 years of growth requirement. The town's proposed land swap is only an overall difference of 5.16 acres (to be removed) and not changing or reducing the number of years of growth.

Final Determination

The AG de-designation criteria outlined above were 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 UGAs. 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 Naches proposal.

In 2002, Yakima County developed the AG de-designation criteria to protect against the inappropriate conversion of designated agricultural land to rural or other non-resource land uses. The criteria were designed to protect agricultural lands that are producing high-value crops (orchards, 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 do provide a measure to consider the location of an agricultural parcel in relation to a UGA, but that measure is just one of ten

different criterion to consider and each has 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.

Therefore, Yakima County Planning Staff is **recommending de-designation** recognizing the need of the community, in addition to the "circumstances" mentioned in the section above, and Town of Naches emergency UGA "modification" amendment staff report. Secondly, the town is complying with the Washington State Department of Commerce's request to work with the County to add and remove lands that are ready and not ready to be developed within the next 20 years. The Planning Commission will need to make their own recommendation using staff's analysis, findings, and public testimony on this issue during their deliberations.

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Attachment 8

Agricultural Resource Mapping Criteria Naches Proposed Emergency UGA Amendment – Modification

The “Mapping Criteria” of the Agricultural Resource (AR) Designation Analytical Process is found in the Land Use subchapter of **Horizon 2040**, Chapter 5.10.3. Adopted in 2017, the Agricultural Resource Designation Mapping Criteria process is as follows:

Washington Administrative Code (WAC) 365-190-050 (1) states that in classifying and designating agricultural resource lands, counties must approach the effort as a county-wide or area-wide process. Counties should not review resource lands designations solely on a parcel-by-parcel process. Therefore, Yakima County will only consider the Agricultural Resource lands mapping criteria listed below for those site-specific properties requesting inclusion in the Agricultural Resource land use category. Reviews on a county-wide or area-wide basis must meet the Agricultural Resource land mapping criteria.

1. *Generally meets criteria for agricultural resource lands of long-term commercial significance as defined by state laws and regulations.*

Staff Analysis: The AR designation is site-specific for parcel 171403-22015 as identified in the Town of Naches’ Emergency UGA Modification request, case nos. LRN2021-00001/SEP2021-00010. The request is to remove the subject parcel from the UGA with a concurrent rezone to the AG zoning district so that three other parcels may be added. This parcel was zoned General Agriculture (GA) and designated Agricultural prior to the town’s request to Yakima County in 2004 to bring it into their UGA. The parcel has remained in agricultural production since its inclusion. The proposed designation and rezone will be consistent with the surrounding parcels and will not conflict with their uses.

- a. *May contain prime soils according to the Natural Resource Conservation Service.*

Staff Analysis: According to RCW 36.70A.030, the definition of "Long-term commercial significance" "includes the growing capacity, productivity, and soil composition of the land for long-term commercial production, in consideration with the land's proximity to population areas, and the possibility of more intense uses of the land." Yakima County GIS reports that this parcel contains two types of prime soils if irrigated, consisting of "Cleman Very Fine Sandy Loam, 5 to 8 percent slopes" and "Cleman Very Fine Sandy Loam, 0 to 2 percent slopes." The Cleman 5 to 8 percent slopes occupy approximately 22.92 acres and the Cleman 0 to 2 percent slopes occupy approximately 5.31 acres. According to the Soil Survey of Yakima County Area Washington (1985), Cleman Very Fine Sandy Loam, 5 to 8 percent slopes has the potential to yield 950 bushels per acre if irrigated and the 0 to 2 percent has to the potential for 1,000 bushels per acre if irrigated. Therefore, the review of this parcel’s soil types meets this criterion.

- b. *May include "pockets" of non-agricultural land uses.*

Staff Analysis: Based on the oldest Yakima County GIS aerial images to the most current, this parcel has been historically farmed since 1947 to produce orchards, hay, and alfalfa.

- c. *May contain high-value crops; specifically, areas where tree fruits vineyards, hopyards, specialty field crops, and dairies are located.*

Staff Analysis: See sections above for soil type potential yield and current agricultural use.

d. *May include a variety of residential uses related to agricultural activities including farm worker housing and family farm dwellings.*

Staff Analysis: If the subject parcel is approved for the AG resource designation with a concurrent rezone, the YCC 19.14-1 “Allowable Land Use Table” allows for a variety of residential uses related to agricultural activities including: an attached or detached accessory dwelling unit, manufactured or mobile home of any size in approved or existing mobile/manufactured home parks, multi-wide manufactured home on an individual lot, second farm dwelling on a parcel at least 20 acres in size in addition to the single-family residence that is in active agricultural use, single-family, and farm worker housing.

e. *May include compatible uses such as the marketing of regional agricultural products from one or more producers; the production, marketing and distribution of value added agricultural products; or packing and cold storage plants.*

Staff Analysis: YCC 19.14-1 “Allowable Land Use Table,” provides for a variety of agricultural related uses including the ones mentioned above. The intensity of agricultural uses will vary with the level of review, comments received, and conditions of approval (see attached YCC 19.14-1 Allowable Land Use Table).

f. *May include non-agricultural accessory uses or activities as long as they are consistent with the size, scale and intensity of the existing agricultural use on a property.*

Staff Analysis: See attached YCC 19.14-1 Allowable Land Use Table for all AG zoning district uses and levels of reviews.

2. *Lands historically zoned Exclusive Agricultural or General Agricultural.*

Staff Analysis: The subject parcel was zoned General Agricultural (GA) prior to the adoption of the Yakima County Comprehensive Plan in 1997, which designated the subject property Agricultural. In February 2000, the subject parcel’s zoning remained Agriculture (AG) to be consistent with and implement the Comprehensive Plan. On December 15, 2005, the subject parcel was brought into the UGA at the request of the town for an expansion and zoned to One-Family Residential (R-1) and designated Urban. In May 2015, the subject parcel’s zoning remained R-1 as part of the development of the new Yakima County Code (YCC) Title 19 – Unified Land Development Code. On January 1, 2016, Ordinance 8-2015 became effective and assigned new Urban Designations to Yakima County’s UGAs which redesignated the subject parcel from Urban to Urban Residential (UR). According to Yakima County GIS, the earliest aerial images show that this parcel has been in agricultural production since 1947.

3. *Lands located within an irrigation district and receiving water, or*

Staff Analysis: The subject parcel is not in an irrigation district; however, it is receiving irrigation water.

4. *Lands where dryland farming, pasture or grazing outside of irrigation districts is predominant.*

Staff Analysis: This area is not used for dryland farming.

5. *Lands enrolled in one of the current use assessment programs.*

Staff Analysis: The subject parcel is not currently enrolled in one of the current use assessment programs.

6. *Lands located outside established Urban Growth Areas.*

Staff Analysis: The lands located outside the Naches UGA and adjacent to the subject parcel are currently zoned AG and designated AR.

Staff Analysis: Based on the review criteria above, there are no findings in the analysis that do not support the subject parcel from being designated Agricultural Resource (AR) with a concurrent rezone to Agriculture (AG) if approved.

Attachment: YCC 19.14-1 Allowable Land Use Table (AG)

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RESOLUTION 2021-15

**A RESOLUTION OF THE TOWN OF NACHES, WASHINGTON,
APPROVING THE AMENDMENT TO THE TOWN'S CAPITAL
FACILITIES PLAN RELATING TO SERVICES TO THE
PROPOSED UGA EXPANSION**

WHEREAS, the Town of Naches received and reviewed notice dated August 9, 2021 from Yakima County regarding the required Capital Facilities Plan Addendum for the Urban Growth Area (UGA) addition to be considered; and,

WHEREAS, the letter requested the submittal of a Capital Facilities Plan or Capital Facilities Plan Addendum regarding the Town's plan to serve the proposed Urban Growth Area; and,

WHEREAS, a Public Hearing on the amendment has been held at the regular council meeting on November 8, 2021, no public testimony was taken, no members of the public spoke regarding the amendment during the Public Hearing.

**BE IT RESOLVED BY THE TOWN COUNCIL OF THE TOWN OF NACHES,
WASHINGTON, AS FOLLOWS:**

The amendments to the Town of Naches Capital Facilities Plan as set forth in the attached amendment are hereby adopted by the Town of Naches and shall become a part of the Capital Facilities Plan of the Town of Naches.

**PASSED BY THE TOWN COUNCIL OF THE TOWN OF NACHES,
WASHINGTON, this 13th day of December, 2021.**



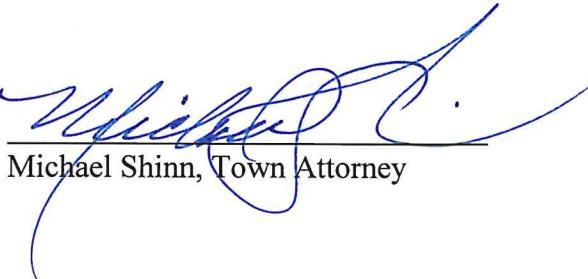
Paul Williams, Mayor

ATTEST:



Elvira Birrueta, Clerk

Approved as to Form:



Michael Shinn, Town Attorney



September 1, 2021

Town of Naches
P.O. Box 95
Naches, WA 98937

Attn: Jeff Ranger, Town Administrator

Re: Town of Naches – General Services
Capital Facilities Plan Addendum for Proposed UGA Additions
HLA Project No. 21001G

Dear Jeff:

We have received and reviewed your letter dated August 9, 2021, from Yakima County regarding the required Capital Facilities Plan Addendum for the Urban Growth Area (UGA) addition. To be considered, the letter indicates the Town must provide updated information for the following items:

1. Expansion Area (location)
2. Cost to Serve (sewer, water, and road including type of service)
3. Identify Funding Source (i.e., city/grant/developer funded)
4. Narrative for Stormwater (generally to retain on-site)
5. Narrative for Timeline
6. Capacity for Water and Sewer (availability to serve)
7. Resolution/Ordinance showing the Addendum was adopted as part of the Capital Facility Plan.

Expansion Area

As seen in the attached exhibit, the Town of Naches is proposing to include the following Tax Parcel Nos. in the expansion of the UGA:

- 171403-42004
- 171403-42005
- 171403-42006
- 171403-42023
- 171533-43005
- 171404-12404
- 171404-12403
- 171404-12402
- 171404-12401

Cost to Serve

Cost Estimates have been prepared for roadway and civil infrastructure improvements within the proposed UGA expansion area. Improvements would include infrastructure for water, sewer, stormwater, and roadway, including curb, gutter, and sidewalk. Cost estimates have been prepared for anticipated improvements and are included as an attachment to this letter. Proposed infrastructure improvements would be completed at:

- a. Kel Lowry Road (South of Old Naches Highway) – \$1,172,000 (2021 dollars)
- b. Simmons Road (Old Naches Highway to Bridge) – \$1,791,000 (2021 dollars)

Estimates outlining the anticipated improvement types and costs along Kel Lowry Road and Simmons Road are attached for reference. Improvement connecting the existing road south of Old Naches Highway into Kel Lowry Road near Bonlow Drive and US-12 are not included in the estimated cost previously shown. These improvements have been evaluated and would increase the cost of Kel Lowry Road construction by \$1,286,000 to a total of \$2,458,000.

Funding Sources

There are a variety of available funding sources that could be used to complete the proposed improvements. The Town should expect all applications to be competitively evaluated and success dependent on many factors.

- a. Transportation Improvement Board (TIB) funding could be used to construct road and sidewalk improvements along all these corridors. TIB generally funds projects that have logical termini and connect existing segments of roadway; however, with the proposed improvements, these roads would fit within the parameters to be considered for funding. Typically, successful Small City Arterial Program (SCAP) projects in the region receive less than \$1 million. The next call for TIB projects is anticipated in August 2022, with award notifications being provided in November 2022. Utility-related construction is not eligible for TIB funding but could be completed concurrently with TIB-funded improvements under a separate schedule of work.
- b. Complete Streets funding could be utilized to construct pedestrian and/or multi-modal facilities along any of the two proposed corridors. Complete Streets projects are most successful when filling a connectivity gap between existing infrastructure or serving a significant number of residents in the area and could be included as part of a development plan.
- c. The option of developer-funded improvements would require the developer to construct at least half street improvements in conjunction with the proposed short or long plat.
- d. The Washington State Public Works Board (PWB) loans money for counties, cities, towns, and special purpose districts to repair, replace, or create infrastructure. Loans are awarded competitively based on applications. Funding is anticipated to be available in April 2022, with applications due in June 2022 and award notifications in August 2022. Design project loans can be up to \$1 million and construction loans up to \$10 million. Interest rates are approximately half the market rate (1.3% in October 2019); however, they will fluctuate based on market conditions. These interest rates are among the best available for public construction projects.
- e. The United States Department of Agriculture (USDA) provides loans and grants for installation of water and wastewater utilities. USDA funding has no application deadline, but interest rates will continue to fluctuate until after an application has been submitted. While the interest rates are dependent on a comparative analysis performed by USDA staff, rates are typically less than 3% and have terms up to 40 years. Grants are dependent on many factors, including poverty rate and costs of similar systems, which are analyzed by USDA staff.

Storm Water

Stormwater associated with the proposed improvements will be collected and retained on site. Stormwater is planned to be collected through a series of catch basins and injected into the ground through subsurface infiltration galleries meeting the requirements of the current Stormwater Management Manual for Eastern Washington (SWMMEW).

Timeline

The Town is currently evaluating opportunities for funding sources. All identified funding sources are under consideration and may be utilized to complete the proposed improvements. If a successful application were submitted through one of the funding sources identified above, it is expected the earliest these improvements could be constructed is spring 2023.

The Town also understands the addition of these areas with the UGA may attract developers who would consider funding the improvements with private dollars. If a developer were to fund, design, and construct these improvements, they could potentially be constructed as early as fall 2022.

Capacity for Water and Sewer (availability to serve)

In 2015, HLA performed analysis of the water and sewer service for the Town of Naches proposed UGA amendment. At that time, the Town had recently completed the 2014 Water System Plan update. This plan found the water distribution system is generally sufficient to meet system demands. Needed improvements recommended in the Water System Plan can be adequately funded, and payment for extension of service is typically the responsibility of the developer.

The limiting factor in meeting future demands is the Certificated Annual Water Rights. Currently, the Town of Naches has 200 acre-feet per year of certificated right and instantaneous rights of 900 GPM. Based on utilization data obtained for the 2020 calendar year, the water right limits the system capacity to 870 ERUs. The Town currently serves 408 ERUs, so there are 462 ERUs available for growth. Using the numbers provided in the "UGA Land Capacity Analysis" of 5.1 dwelling units per acre (which we believe to be high), the 40.85 acres of residential area in the new UGA would equal about 209 ERUs, leaving an additional 253 ERUs for future development. The ERU demand of other uses within the expanded UGA will depend on the type of development.

A General Sewer Plan was prepared for the Town in 1997. The Town limits and UGA at that time encompassed 394 acres and has been increased to a current area of 689 acres. Although the UGA has expanded, the collection system capacity is sufficient to carry flow from the new UGA. In addition, the Town is in the process of significantly expanding the capacity of the wastewater treatment plant. The additional service required for the proposed UGA is within the growth projections for the wastewater treatment plant, which will be capable of serving current and future demands. Like the water system, payment for extension of service is the responsibility of the developer, if necessary.

Resolution/Ordinance Showing the Addendum was Adopted

A resolution adopting the proposed addendum as a part of the Capital Facility Plan will be provided by the Town.

Should you have any questions or need more information regarding our review, please contact our office.

Very truly yours,



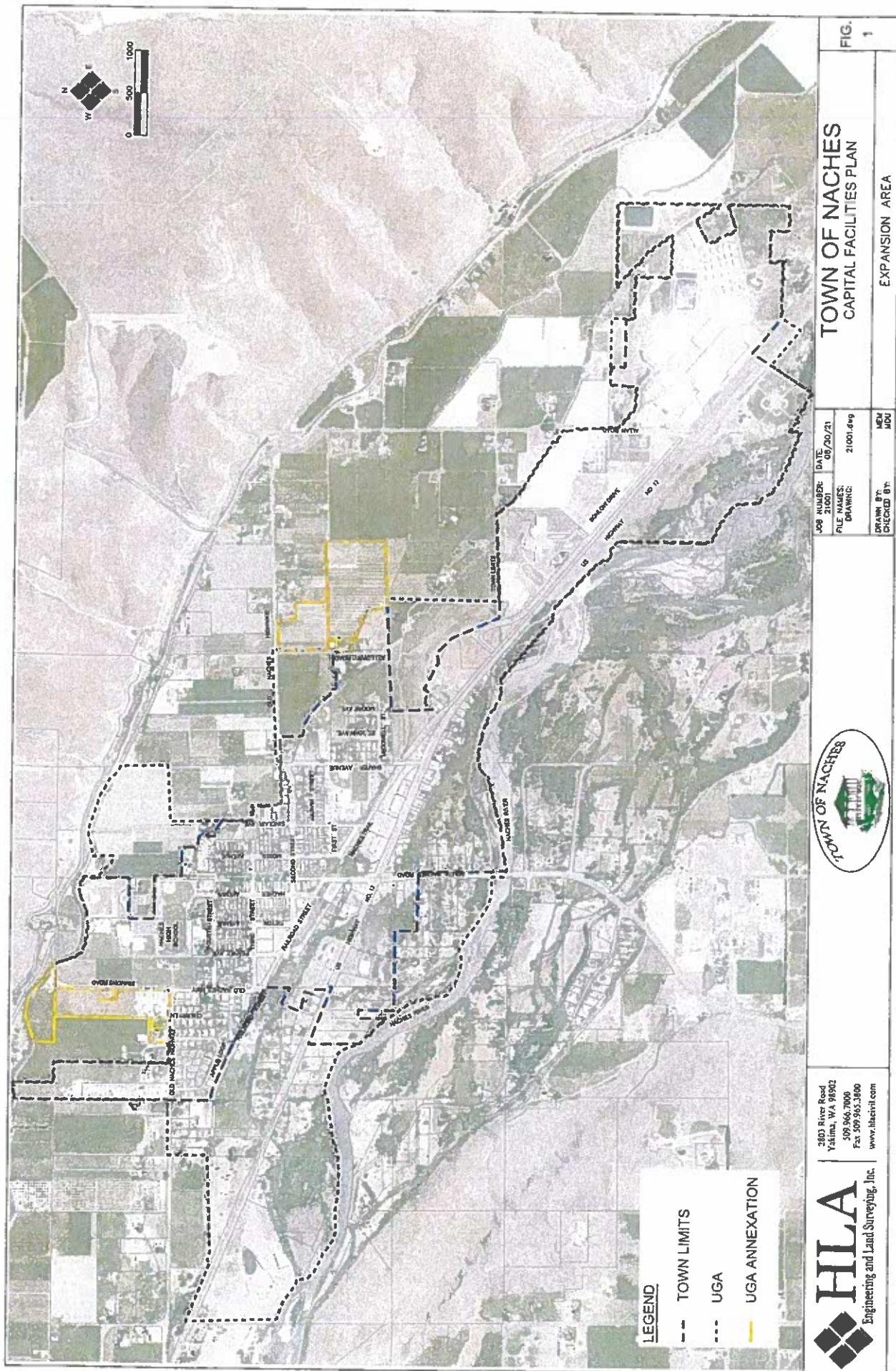
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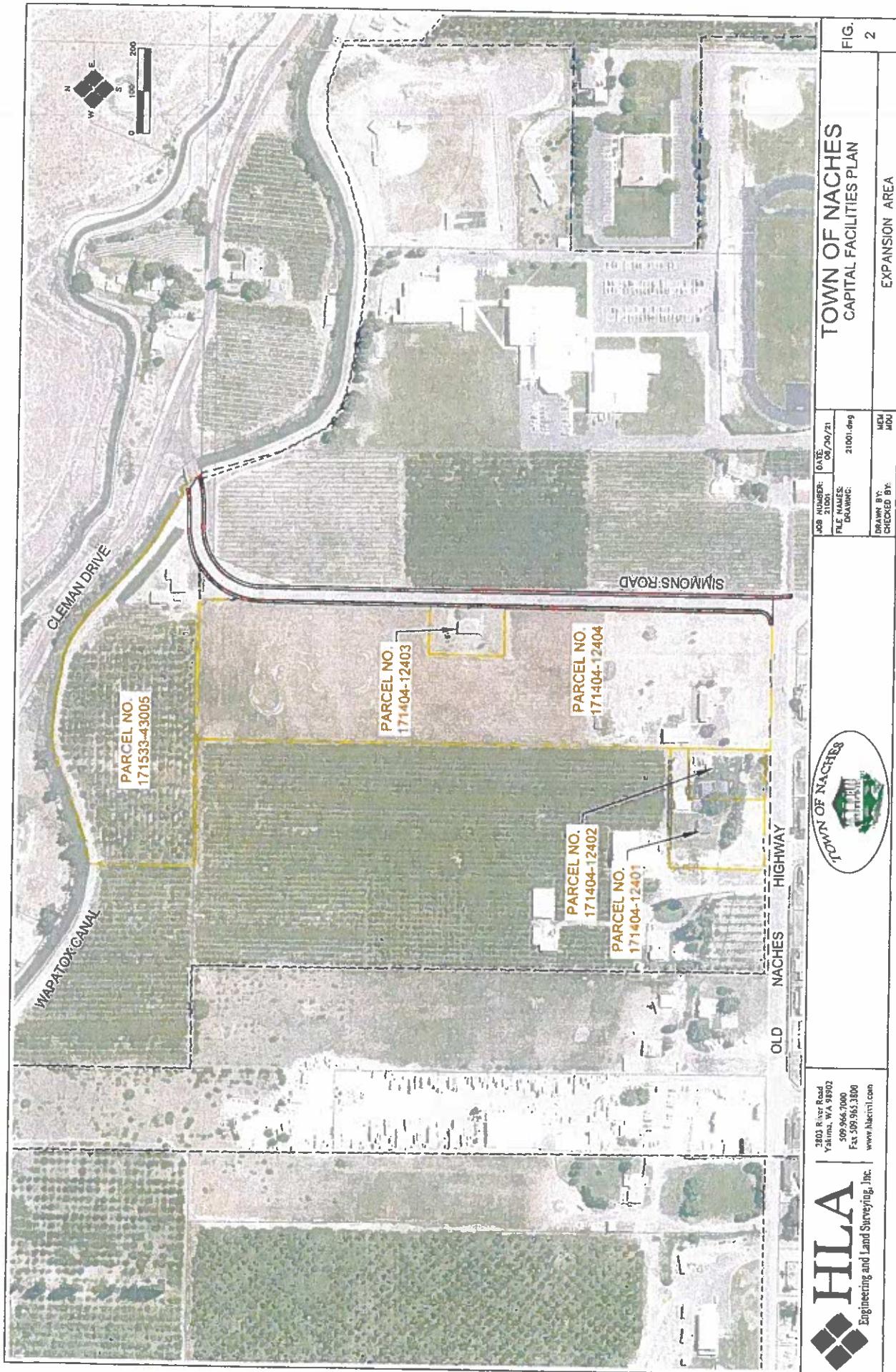
Michael D. Uhlman, PE

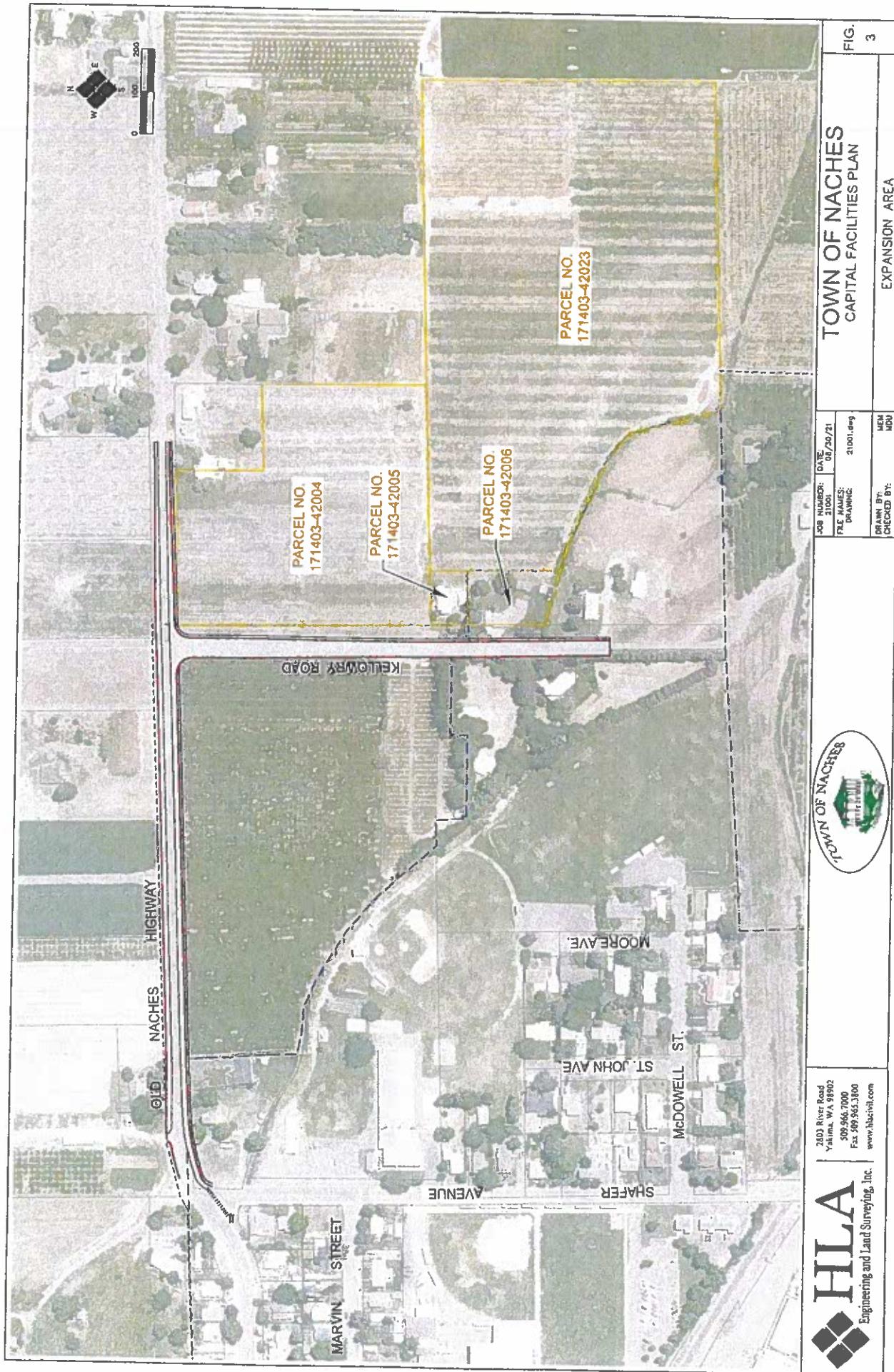
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Enclosures

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TOWN OF NACHES
Kel Lowry Road
Engineer's Opinion of Construction Cost

9/1/2021

HLA Project No. 21001

Item No.	Description	Payment Specification	Unit	Unit Cost	Overall Quantity	Overall Cost
Schedule B - Kel Lowry Rd						
1	Minor Change	1-04.4(1)	FA	\$5,000.00	1	\$5,000.00
2	SPCC Plan	1-07.15(1)	LS	\$1,000.00	1	\$1,000.00
3	Mobilization	1-09.7	LS	\$57,000.00	1	\$57,000.00
4	Project Temporary Traffic Control	1-10.5	LS	\$5,000.00	1	\$5,000.00
5	Unclassified Excavation Incl. Haul	2-03.5	CY	\$40.00	1,500	\$60,000.00
6	Crushed Surfacing Base Course	4-04.5	TON	\$50.00	1,550	\$77,500.00
7	Crushed Surfacing Top Course	4-04.5	TON	\$60.00	700	\$42,000.00
8	HMA Cl. 1/2-Inch PG 64S-28	5-04.5	TON	\$100.00	750	\$75,000.00
9	Storm Sewer Pipe 12 In. Diam.	7-04.5	LF	\$70.00	170	\$11,900.00
10	Underdrain Pipe Infiltration Trench System 12 In. Diam.	7-04.5	LF	\$150.00	180	\$27,000.00
11	Catch Basin Type 2 48 In. Diam.	7-05.5	EA	\$4,500.00	3	\$13,500.00
12	Catch Basin Type 1	7-05.5	EA	\$2,000.00	6	\$12,000.00
13	Manhole 48 In. Diam. Type 1	7-05.5	EA	\$800.00	3	\$2,400.00
14	Shoring or Extra Excavation	7-08.5	LF	\$1.00	3,350	\$3,350.00
15	Select Backfill, as Directed	7-08.5	CY	\$60.00	60	\$3,600.00
16	D.I. Pipe for Water Main 6 In. Diam.	7-09.5	LF	\$65.00	1,000	\$65,000.00
17	Service Connection 3/4 In. Diam.	7-15.5	EA	\$1,500.00	5	\$7,500.00
18	PVC Sanitary Sewer Pipe 4 In. Diam.	7-17.5	EA	\$2,000.00	5	\$10,000.00
19	PVC Sanitary Sewer Pipe 8 In. Diam.	7-17.5	LF	\$70.00	2,000	\$140,000.00
20	Cement Conc. Traffic Curb and Gutter	8-04.5	LF	\$35.00	2,000	\$70,000.00
21	Cement Conc. Sidewalk 6-Inch Thick	8-14.5	SY	\$80.00	50	\$4,000.00
22	Cement Conc. Sidewalk 4-Inch Thick	8-14.5	SY	\$70.00	650	\$45,500.00
23	Illumination System, Complete	8-20.5	LS	\$25,000.00	1	\$25,000.00
24	Permanent Signing	8-21.5	LS	\$5,000.00	1	\$5,000.00
25	Pavement Markings	8-22.5	LS	\$5,000.00	1	\$5,000.00
Subtotal						\$773,000.00
Contingency 15%						\$116,000.00
Total Estimated Construction Cost						\$889,000.00
Assumptions:						
1. 45' and 34' wide TBC to TBC roadway section (3" HMA, 3" CSTC, 6" CSBC) 2. 6' wide sidewalk east side 3. 5' bike lanes on east and west side 4. Existing road is unpaved 5. 60 LF of infiltration trench per catch basin pairing every 350'± 6. Right of way acquisition and services not included 7. Illumination space at ±300' 8. Estimated Improvements terminate near end of existing roadway 9. Connecting near Bonlow Drive would add \$1,258,000 to shown project cost						
Design Engineering 15%						\$133,350.00
Construction Engineering 15%						\$133,350.00
Total Estimated Project Cost						\$1,155,700.00

TOWN OF NACHES
Simmons Road
8/30/2021
Engineer's Opinion of Construction Cost

HLA Project No. 21001

Item No.	Description	Payment Specification	Unit	Unit Cost	Overall Quantity	Overall Cost
Simmons Road						
1	Minor Change	1-04.4(1)	FA	\$5,000.00	1	\$5,000.00
2	SPCC Plan	1-07.15(1)	LS	\$1,000.00	1	\$1,000.00
3	Mobilization	1-09.7	LS	\$89,000.00	1	\$89,000.00
4	Project Temporary Traffic Control	1-10.5	LS	\$5,000.00	1	\$5,000.00
5	Unclassified Excavation Incl. Haul	2-03.5	CY	\$40.00	1,800	\$72,000.00
6	Crushed Surfacing Base Course	4-04.5	TON	\$50.00	2,160	\$108,000.00
7	Crushed Surfacing Top Course	4-04.5	TON	\$60.00	810	\$48,600.00
8	HMA Cl. 1/2-Inch PG 64S-28	5-04.5	TON	\$100.00	910	\$91,000.00
9	Segmental Block Wall	6-02.5	SF	\$35.00	1,300	\$45,500.00
10	Gravel Backfill for Wall	6-02.5	CY	\$60.00	110	\$6,600.00
11	Storm Sewer Pipe 12 In. Diam.	7-04.5	LF	\$70.00	150	\$10,500.00
12	Underdrain Pipe Infiltration Trench System 12 In. Diam.	7-04.5	LF	\$150.00	240	\$36,000.00
13	Catch Basin Type 2 48 In. Diam.	7-05.5	EA	\$4,000.00	4	\$16,000.00
14	Catch Basin Type 1	7-05.5	EA	\$2,000.00	8	\$16,000.00
15	Manhole 48 In. Diam. Type 1	7-05.5	EA	\$4,000.00	8	\$32,000.00
16	Shoring or Extra Excavation	7-08.5	LF	\$1.00	4,450	\$4,450.00
17	Select Backfill, as Directed	7-08.5	CY	\$60.00	45	\$2,700.00
18	D.J. Pipe for Water Main 8 In. Diam.	7-09.5	LF	\$80.00	1,540	\$123,200.00
19	Gate Valve 8 In.	7-12.5	EA	\$1,800.00	3	\$5,400.00
20	Service Connection 3/4 In. Diam.	7-15.5	EA	\$1,500.00	5	\$7,500.00
21	PVC Sanitary Sewer Pipe 4 In. Diam.	7-17.5	EA	\$2,000.00	5	\$10,000.00
22	PVC Sanitary Sewer Pipe 8 In. Diam.	7-17.5	LF	\$70.00	2,510	\$175,700.00
23	Cement Conc. Traffic Curb and Gutter	8-04.5	LF	\$30.00	3,250	\$97,500.00
24	Cement Conc. Sidewalk 6-Inch Thick	8-14.5	SY	\$80.00	110	\$8,800.00
25	Cement Conc. Sidewalk 4-Inch Thick	8-14.5	SY	\$60.00	2,030	\$121,800.00
26	Cement Conc. Curb Ramp	8-14.5	EA	\$2,000.00	1	\$2,000.00
27	Mailbox Support, Type 1	8-18.5	EA	\$40.00	1	\$40.00
28	Illumination System, Complete	8-20.5	LS	\$50,000.00	1	\$50,000.00
29	Permanent Signing	8-21.5	LS	\$2,000.00	1	\$2,000.00
30	Pavement Markings	8-22.5	LS	\$5,000.00	1	\$5,000.00
						Subtotal \$1,198,000.00
						Contingency 15% \$179,700.00
						Total Estimated Construction Cost \$1,377,700.00
						Design Engineering 15% \$206,660.00
						Construction Engineering 15% \$206,660.00
						Total Estimated Project Cost \$1,791,020.00

Attachment 10

