

1 **Yakima County**
2 **Public Services Department**
3 **Planning Division**

4
5 **Yakima County’s 2025 Review of its UGAs and Permitted Densities**
6 **(as required by the Growth Management Act)**

7
8 **Urban Growth Area for**
9 **City of Moxee**

10
11 **Staff Report**
12 **July 23, 2025**

13 Staff contact: Olivia Story, Long Range Planning Manager
14 Olivia.story@co.yakima.wa.us (509) 574-2300
15

16 **Introduction**

17
18
19 The Growth Management Act (GMA) provides:

20
21 “(a) Each county that designates urban growth areas under RCW 36.70A.110 shall review,
22 according to the schedules* established in [RCW 36.70A.130(5)(c)], its designated urban growth
23 area or areas, patterns of development occurring within the urban growth area or areas, and the
24 densities permitted within both the incorporated and unincorporated portions of each urban growth
25 area. In conjunction with this review by the county, each city located within an urban growth area
26 shall review the densities permitted within its boundaries, and the extent to which the urban growth
27 occurring within the county has located within each city and the unincorporated portions of the
28 urban growth areas.
29

30 “(b) The county comprehensive plan designating urban growth areas, and the densities
31 permitted in the urban growth areas by the comprehensive plans of the county and each city located
32 within the urban growth areas, shall be revised to accommodate the urban growth projected to occur
33 in the county for the succeeding 20-year period ...”
34 [RCW 36.70A.130(3)]
35

36 *The GMA requires Yakima County and its cities to complete the UGA reviews and revisions by
37 December 31, 2026.
38

39 This report is part of Yakima County’s efforts to meet its obligations under the RCWs cited above. It
40 constitutes a recommendation to the County Planning Commission as well as the County’s initial
41 “show-your-work” exhibit as required by the GMA. A draft was shared with the City of Moxee to
42 improve accuracy and foster a collaborative approach, and to assist Moxee in meeting its
43 responsibilities under these RCWs.
44

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

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

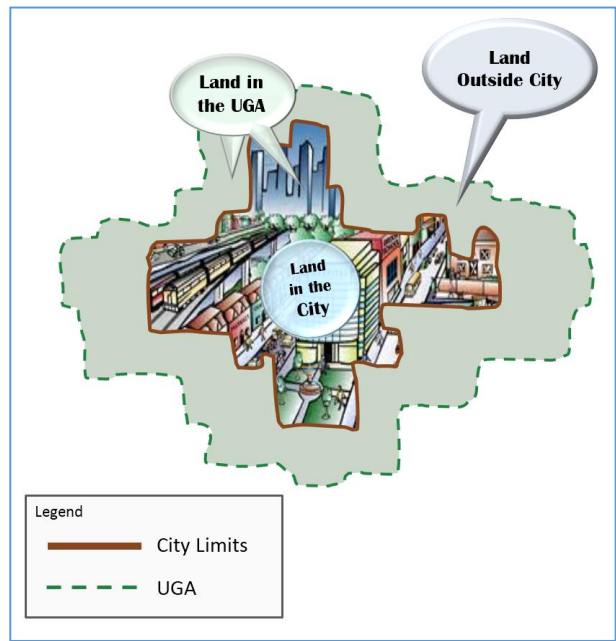
After reviewing OFM's most recent population projections for Yakima County, the Yakima County Planning Division prepared a draft report entitled *Yakima County – Draft 2046 Population Projections and Allocations* that allocated the projected population growth among the county's 14 cities.

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

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

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

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



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

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

Acres needed for future residential
(plus) Acres needed for future commercial
(plus) Acres needed for future community facilities
(plus) Acres needed for future Streets

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

(plus) Acres needed for future industrial

Subtotal: the total acreage needed for UGA Growth

Acres of currently vacant residentially zoned land

(plus) Acres of currently vacant commercially zoned land

(plus) Acres of currently vacant community facilities land

(plus) Acres of currently vacant industrially zoned land

Subtotal: the vacant acreage available for growth within the current UGA

Subtotal: total acreage needed for UGA growth

(minus) Subtotal: the vacant acreage available for growth within the current UGA

Total: Net Acreage Available in the UGA for Future Growth.

Quantity of land calculations for non-industrial uses

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

In summary, this analysis finds that Moxee's UGA has enough vacant lands to accommodate its non-industrial growth for 39 years. It has a surplus of 283 residentially zoned vacant acres, a surplus of 4 commercially zoned vacant acres, and a deficit of 36 vacant acres owned by providers of community facilities to accommodate projected growth through 2046, as explained below:

- 1. Population and Households Analysis:** Based on Moxee's projected 2024-2046 population growth, this analysis estimates that 1,152 additional households will be added to the city's population by the year 2046.

2046 population forecast for City (City/County consensus)		People 9,076
2024 population in City (OFM's April 1 estimate)		People 4,820
Population change: 2024 – 2046		People 4,256
Average household size in City: 2020 ²		People 3.83
Future Households in the City 2024 – 2046		<u>1,111 households</u>

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

(8,500 sq. ft. x 1,111 households) ÷ 43,560 sq. ft. per acre =	<u>217 acres</u>
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- 3. Future Commercial & Retail Land Need:** The acreage needed for future commercial and retail growth through 2046 was calculated by multiplying the projected population increase by the current per person acreage of developed commercial lands within the city.

² Taken from Table S1101 – 5-Year American Community Survey

4,256 people x .0035 acres per person =	<u>15 acres</u>
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4. **Future Community Facilities Land Need:** The acreage needed for future community facilities growth through 2046 was calculated by multiplying the projected population increase by the current per person acreage of developed community facilities land within the city:

4,256 people x .0108 acres per person =	<u>46 acres</u>
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5. **Future Streets Land Need:** The acreage needed for future rights-of-way to accommodate streets and utilities through 2046 was calculated by multiplying the acreage needed for future residential, commercial and retail, and community facilities by 15%:

Residential acreage needed	217 acres
(plus) Commercial/retail acreage needed	15 acres
(plus) Community facilities acreage needed	46 acres
Subtotal	278 acres
Equals: Total streets acreage needed (Subtotal x .15)	<u>42 acres</u>

6. Land Capacity Analysis (LCA)³

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

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

a) Residentially zoned capacity calculation:

Currently vacant residentially zoned land in the city	232 acres
(minus) needed residential acreage, including associated streets	250 acres
Subtotal: Deficit of vacant residentially zoned land within city	<u>(18) acres</u>
(plus) current vacant residentially zoned land outside the city	301 acres
Equals: Surplus of vacant residentially zoned land in the UGA	<u>283 acres</u>

b) Commercially zoned capacity calculation:

Currently vacant commercial and retail zoned land in city	6 acres
(minus) needed commercial and retail acreage, including associated streets	17 acres
Subtotal: Deficit of vacant commercially zoned land in city	<u>(11) acres</u>
(plus) Surplus current vacant commercially zoned land outside the city	15 acres
Equals: Surplus of vacant commercially zoned land in the UGA	<u>4 acres</u>

c) Community facilities capacity calculation:

Current vacant community facilities land in city	17 acres
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³ The spreadsheet in Attachment 1 provides the LCA steps and expanded descriptions for assumptions and calculations.

(minus) need community facility acreage, including associated streets	53 acres
Subtotal: Deficit of vacant community facilities in City	<u>(36) acres</u>
(plus) Currently vacant community facilities land outside of the city	0 acres
Equals: Deficit of vacant community facilities land in UGA	<u>36 acres</u>

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

Surplus of vacant residentially zoned land	283 acres
(plus) Surplus of vacant commercially zoned land	4 acres
(plus) Deficit of land needed for future community facilities	(36) acres
Equals: Surplus of vacant land in non-industrially zoned UGA	<u>251 acres</u>

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

Deficit of vacant land for residential, commercial, community facilities, and streets	(65) acres
Equals: Years of growth available in City in 2024	<u>18 years</u>

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

Equals: Years of growth available outside City in 2024	<u>21 years</u>
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g) Years of growth in UGA (excluding industrial growth)

Surplus of vacant land for residential, commercial, community facilities, & streets within UGA	251 acres
(computed) Market Choice Factor in UGA (MCF) ⁴	78 percent
Equals: Years of growth available in UGA in 2024	<u>39 years</u>

Years of growth for non-industrially zoned UGA calculation

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

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

 Inserting Moxee's numbers (from the table below) in the formula provides the following percentage for Moxee's MCF:

$$(571 \div 320) - 1 = 78\%$$

The MCF% is then utilized in the final calculations to result in the years of growth available in the UGA (see below). The County's 2046 UGA Update calculated the amount of vacant land needed for the next 22 years of growth as Yakima County's land capacity analysis spans 2024 to 2046 (RCW 36.70A.130(b)).

⁴ MCF Use and Calculations Summary are found below under Conclusion of Above Tables

$$\text{MCF in Years} = (78\% + 1) \times 22 = 39 \text{ years of growth}$$

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

Acres needed for future residential uses (and associated streets)	250 acres
(plus) Acres needed for future commercial & retail uses (and associated streets)	17 acres
(plus) Acres needed for future community facilities (and associated streets)	53 acres
Equals: Total vacant acres needed for future non-industrial growth	<u>320 acres</u>
Total amount of currently vacant Non-Industrially Zoned Land in UGA: (vacant residential + vacant commercial/retail uses + vacant community)	571 acres

7. Future industrial land needs:

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

Currently developed industrially zoned land in city	214 acres
Currently developed industrially zoned land outside city	0 acres
Currently vacant industrially zoned land in city	489 acres
Currently vacant industrially zoned land outside city	0 acres
Additionally vacant industrially zoned land need in city	0 acres
Additionally vacant industrially zoned land need outside city	0 acres

Review of Patterns of Development and Densities Permitted in the UGA

In addition to reviewing Moxee's UGA as shown above, Yakima County must also review the densities permitted within both the incorporated and unincorporated portions of the UGA, and the patterns of development occurring within the UGA, as required by RCW 36.70A.130(3)(a).

The City of Moxee includes 8 zoning districts within its limits: R-1 (Single-family, manufactured or modular home on a single lot), R-2 (Single-family and two-family), R-3 (Multifamily), RR (Rural residential), C-1 (Central business district), C-2 (General commercial), I (Light industrial/manufacturing), and P (Public).

The densities permitted in the residential zones are analyzed below. The residential zoning districts and their allowed densities are:

City of Moxee Zoning (Title 16 Land Use and Development)		
Zoning District	Minimum Lot Size	Density
R-1 (Single-family, manufactured or modular home on a single lot)	7,000 sq ft	6 dwelling units (du)/acre
R-2 (Single-family and two-family)	5,000 sq ft to 7,000 sq ft	7.26 to 12 du/acre

R-3 (Multifamily)	4,000 sq ft to 7,000 sq ft	7.26 to 20 du/acre
RR (Rural residential)	21,780 sq ft to 7,000 sq ft	2 to 6 du/acre
Yakima County Zoning in the Urban Growth Area (Yakima County Code Title 19)		
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

Conclusions of the Above Tables

Within its city limits, Moxee currently has 232 acres of vacant residential-zoned land. If developed with single-family homes on 7,000 square foot lots within city limits, the area could accommodate 1,444 new homes.

Outside city limits, Moxees' Urban Growth Area (UGA) contains 301 vacant acres. All residential land in the UGA falls under the County R-1 zone, which allows a maximum density of seven units per acre. If built to capacity at an 8,500 square foot lot/5.1 du density, the UGA could support 1,535 new homes, far exceeding the identified need of 1,111 homes for the entire area.

City/County Collaboration

County staff met with City of Moxee representatives on June 11, 2024, and again on January 16, 2025, to collaboratively review the population projections and Yakima County's Land Capacity Analysis for the Moxee Urban Growth Area. During these meetings, staff reviewed parcel-level GIS data, discussed the City's recent residential growth trends, and evaluated permitted densities under the County's R-1 zoning. The conversations focused on verifying the accuracy of identified vacant and partially vacant parcels, confirming infrastructure availability for future development, and comparing land supply with the projected housing need through 2046. City staff expressed support for the County's approach and emphasized the importance of maintaining a mix of housing types, while also ensuring future development aligns with Moxee's housing plans. These meetings provided essential local insight and ensured that the land capacity assumptions used in the analysis reflect the City's current conditions and future growth objectives.

Major Rezone and Plan Amendment Review Criteria

County staff have had, and will continue to have, collaborative discussions with the City of Moxee regarding any potential changes to future land use designations or zoning within Moxee's unincorporated UGA. Should any rezones be proposed, the criteria outlined in this section would need to be carefully evaluated as part of that ongoing coordination.

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

(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

- 1 *plans, applicable capital facilities plans and official population growth forecasts and*
2 *allocations;*
- 3 *(b) The site is more consistent with the criteria for the proposed map designation than it is*
4 *with the criteria for the existing map designation;*
- 5 *(c) The map amendment or site is suitable for the proposed designation and there is a lack of*
6 *appropriately designated alternative sites within the vicinity;*
- 7 *(d) For a map amendment, substantial evidence or a special study has been furnished that*
8 *compels a finding that the proposed designation is more consistent with comprehensive*
9 *plan policies than the current designation;*
- 10 *(e) To change a resource designation, the policy plan map amendment must be found to do*
11 *one of the following:*
- 12 *(i) Respond to a substantial change in conditions beyond the property owner's*
13 *control applicable to the area within which the subject property lies; or*
- 14 *(ii) Better implement applicable comprehensive plan policies than the current map*
15 *designation; or*
- 16 *(iii) Correct an obvious mapping error; or*
- 17 *(iv) Address an identified deficiency in the plan. In the case of Resource Lands, the*
18 *applicable de-designation criteria in the mapping criteria portion of the land use*
19 *subchapter of Yakima County Comprehensive Plan, Volume I, Chapter I, shall be*
20 *followed. If the result of the analysis shows that the applicable de-designation*
21 *criteria has been met, then it will be considered conclusive evidence that one of*
22 *the four criteria in paragraph (e) has been met. The de-designation criteria are*
23 *not intended for and shall not be applicable when resource lands are proposed*
24 *for re-designation to another Economic Resource land use designation;*
- 25 *(f) A full range of necessary public facilities and services can be adequately provided in an*
26 *efficient and timely manner to serve the proposed designation. Such services may include*
27 *water, sewage, storm drainage, transportation, fire protection and schools;*
- 28 *(g) The proposed policy plan map amendment will not prematurely cause the need for nor*
29 *increase the pressure for additional policy plan map amendments in the surrounding*
30 *area.*

31
32 Findings: Any zoning map amendments will be processed as a major rezone in accordance with
33 YCC Chapter 16B.10, and all applicable review criteria, including consistency with the Growth
34 Management Act and the Comprehensive Plan, will be fully addressed during the amendment
35 process.

- 36
37 *(2) The following criteria shall be considered in any review and approval of changes to Urban*
38 *Growth Area (UGA) boundaries:*

39 *(a) Land Supply:*

- 40 *(i) The amount of buildable land suitable for residential and local commercial*
41 *development within the incorporated and the unincorporated portions of the*
42 *Urban Growth Areas will accommodate the adopted population allocation and*
43 *density targets;*
- 44 *(ii) The amount of buildable land suitable for purposes other than residential and*
45 *local commercial development within the incorporated and the unincorporated*
46 *portions of the Urban Growth Areas will accommodate the adopted forecasted*
47 *urban development density targets within the succeeding twenty-year period;*
- 48 *(iii) The Planning Division will use the definition of buildable land in YCC*
49 *[16B.02.045](#), the criteria established in RCW [36.70A.110](#) and .130 and applicable*
50 *criteria in the Comprehensive Plan and development regulations;*

- 1 (iv) *The Urban Growth Area boundary incorporates the amount of land determined to*
2 *be appropriate by the County to support the population density targets;*
3 (b) *Utilities and services:*
4 (i) *The provision of urban services for the Urban Growth Area is prescribed, and*
5 *funding responsibilities delineated, in conformity with the comprehensive plan,*
6 *including applicable capital facilities, utilities, and transportation elements, of*
7 *the municipality;*
8 (ii) *Designated Ag. resource lands, except for mineral resource lands that will be*
9 *reclaimed for urban uses, may not be included within the UGA unless it is shown*
10 *that there are no practicable alternatives, and the lands meet the de-designation*
11 *criteria set forth in the comprehensive plan.*
12

13 Findings: Any proposal to amend the Urban Growth Area boundary will be reviewed in
14 accordance with YCC Chapter 16B.10 and applicable state and local requirements. All criteria
15 related to land supply, urban service provision, and resource land protections will be addressed to
16 ensure consistency with the Growth Management Act, the County Comprehensive Plan, and
17 supporting capital facility plans. In accordance with Countywide Planning Policy A.3.11, the
18 County and City will identify capital improvement requirements to ensure urban services can be
19 provided within the forecast period. Any expansion of the UGA will also trigger require
20 necessary updates to the Capital Facilities, Utilities, and Transportation Elements of the
21 Comprehensive Plan to demonstrate availability of services to the proposed area.
22

- 23 (3) *Land added to or removed from Urban Growth Areas shall be given appropriate policy plan map*
24 *designation and zoning by Yakima County, consistent with adopted comprehensive plan(s).*
25

26 Findings: Any land added to or removed from an Urban Growth Area as part of this amendment
27 will be assigned appropriate Comprehensive Plan map designations and zoning consistent with
28 Yakima County's adopted Comprehensive Plan and applicable city plans.
29

- 30 (4) *Cumulative impacts of all plan amendments, including those approved since the original*
31 *adoption of the plan, shall be considered in the evaluation of proposed plan amendments.*
32

33 Findings: The cumulative impacts of the proposed amendment, along with those of previously
34 approved plan amendments since the original adoption of the Comprehensive Plan, will be
35 evaluated to ensure consistency with countywide planning goals and to avoid adverse impacts on
36 land supply, public services, and infrastructure capacity. The cumulative impacts will be
37 addressed in the Planning Commission's findings.
38

- 39 (5) *Plan policy and other text amendments including capital facilities plans must be consistent with*
40 *the GMA, SMA, CWPP, other comprehensive plan goals and policies, and, where applicable, city*
41 *comprehensive plans and adopted inter-local agreements.*
42

43 Findings: This criterion is not applicable. Any modifications to Moxee's Urban Growth Area
44 would be addressed through map amendments rather than through changes to comprehensive
45 plan policies or text.
46

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

Findings: This criterion is not applicable. Any modifications to Moxee's Urban Growth Area would be addressed through map amendments rather than through changes to comprehensive plan policies or text.

Conclusion(s)

1. The County's LCA for Moxee calculates a surplus of 301 acres of vacant residentially zoned land, a surplus of 4 acres of vacant commercially zoned land, and a deficit of 36 acres of vacant land for community facilities and all associated streets within the current UGA for all non-industrial uses through 2046. Overall, this is a surplus of 251 acres over what is needed, which can accommodate Moxee's growth for the next 39 years (from 2024).
2. This Land Capacity Analysis finds that Moxee's current city limits would accommodate the City's growth for 18 years (from 2024) and that the UGA could accommodate the City's growth for 39 years (from 2024). Because the GMA requires the UGA to accommodate growth for only 22 years (i.e., from 2024 to 2046), the UGA should not be expanded but could be reduced in size.

Recommendation(s)

1. County Planning staff recommends no additions or removals to the City of Moxee's UGA at this time, as staff aims to continue examining and engaging with the City on areas to remove from the UGA when more time can be spent on public engagement and planning for water, sewers, and streets.
2. County Planning staff recommends no changes to the comprehensive plan designations or zoning in Moxee's unincorporated UGA.

Attachments:

1. UGA LCA (spreadsheet)
2. County's population projection for Moxee
3. *Horizon 2040*'s description of the analytical process for the UGA LCA
4. LCA for City (map) Forthcoming