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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.

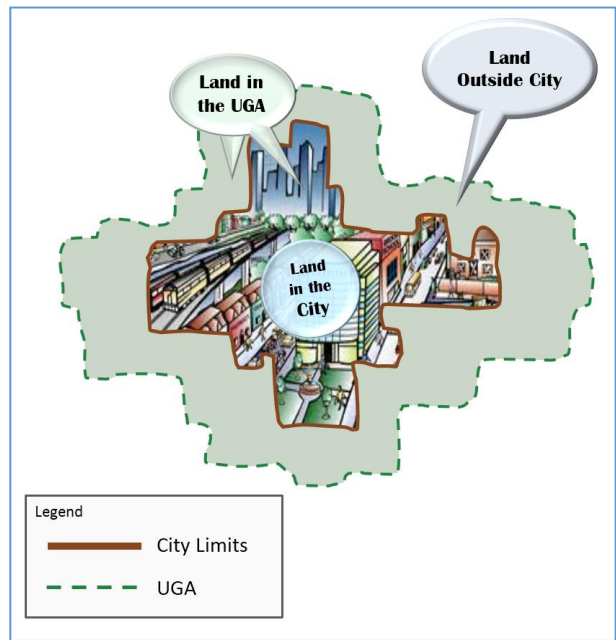
After reviewing OFM's most recent population projections for Yakima County, the Yakima County Planning Division prepared a draft report entitled *Yakima County – Draft 2046 Population Projections and Allocations* that allocated the projected population growth among the county's 14 cities.

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 Naches' 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 Naches’ UGA has enough vacant lands to accommodate its non-industrial growth for 23 years. It has a surplus of 1 residentially zoned vacant acres, a surplus of 25 commercially zoned vacant acres, and a deficit of 31 vacant acres owned by providers of community facilities to accommodate projected growth through 2046, as explained below:

1. **Population and Households Analysis:** Based on Naches’ projected 2024-2046 population growth, this analysis estimates 295 additional households will be added to the city’s population by the year 2046.

2046 population forecast for City (City/County consensus)	1,732 people
2024 population in City (OFM’s April 1 estimate)	1,125 people
Population change: 2024 – 2046	607 people
Average household size in City in 2020 ²	2.06 people
Future Households in the City 2024 – 2046	<u>295 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 (then divided by 43,560 to convert the number to acres):

(8,500 sq. ft. x 295) ÷ 43,560 households per acre =	<u>58 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

607 people x .0356 acres per person =	<u>22 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:

607 people x .0889 acres per person =	<u>54 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	58 acres
(plus) Commercial/retail acreage needed	22 acres
(plus) Community facilities acreage needed	54 acres
Subtotal	<u>134 acres</u>
Street acreage needed (Subtotal x 0.15)	20 acres
Total	<u>154 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	33 acres
(minus) needed residential acreage, including associated streets	67 acres
Subtotal: (Deficit) of vacant residentially zoned land within city	(34) acres
(plus) current vacant residentially zoned land outside the city	42 acres
Equals: Surplus of vacant residentially zoned land in the UGA	8 acres

b) Commercially zoned capacity calculation:

Currently vacant commercial and retail zoned land in city	42 acres
(minus) needed commercial and retail acreage, including associated streets	25 acres
Subtotal: Surplus of vacant commercially zoned land in city	17 acres
(plus) Surplus current vacant commercially zoned land outside the city	1 acre
Equals: Surplus of vacant commercially zoned land in the UGA	18 acres

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

c) Community facilities capacity:

Current vacant community facilities land in city	16 acres
(minus) need community facility acreage, including associated streets	62 acres
Subtotal: (Deficit) of vacant community facilities in City	(46) acres
(plus) Currently vacant community facilities land outside of the city	21 acres
Equals: (Deficit) of vacant community facilities land in UGA	(25) acres

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

Surplus of vacant residentially zoned land	8 acres
(plus) Surplus of vacant commercially zoned land	18 acres
(plus) (Deficit) of land needed for future community facilities	(25) acres
Equals: (Deficit) of vacant land in non-industrially zoned UGA	1 acres

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

(Deficit) of vacant land for residential, commercial, community facilities, and streets	(63) acres
Equals: Years of growth available in City in 2024	13 years

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

Equals: Years of growth available outside City in 2024	9 years
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g) Years of growth in UGA (excluding industrial growth)

(Deficit) of vacant land for residential, commercial, community facilities, & streets within UGA	1 acres
(computed) Market Choice Factor in UGA (MCF) ⁴	1%
Equals: Years of growth available in UGA in 2024	22 years

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

$$(155 \div 154) - 1 = 1\%$$

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

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)).

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

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)	67 acres
(plus) Acres needed for future commercial & retail uses (and associated streets)	25 acres
(plus) Acres needed for future community facilities (and associated streets)	62 acres
Equals: Total vacant acres needed for future non-industrial growth	154 acres
Total amount of currently vacant Non-Industrially Zoned Land in UGA: (vacant residential + vacant commercial/retail uses + vacant community)	155 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 (see below), which are seen as being able to support Naches' industrial needs through 2046.

Currently developed industrially zoned land in city	94 acres
Currently developed industrially zoned land outside city	35 acres
Currently vacant industrially zoned land in city	4 acres
Currently vacant industrially zoned land outside city	12 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 Naches' 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 Town of Naches includes two zoning districts within its limits: R-1 (Single Family Residential), R-2 (Single and Two Family Residential), L-I (Light Industrial), GB (General Business), and PL/I (Public Lands/Institutions).

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

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
Title 17.12	8,200 sq. ft.	Duplex

R-2 (Residential) Title 17.16	5,000 sq. ft. 8,200 sq. ft. 10,200 sq. ft. 12,200 sq. ft.	Single-Family Residence Duplex Triplex Fourplex
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 Above Tables

A portion of the southern part of the Town of Naches and the unincorporated part of the UGA are within FEMA mapped floodplains. This affects subdivision potential for residential lots within these areas. An impactful development standard for subdividing within the floodplain is that new lots within the floodplain must be a minimum of one acre (YCC 16C.3.27(3)(b)(iv)). To accommodate for this, the total number of residential land within the floodplain was totaled. As the standard residential density used is 5.1 dwelling units per acre, the total acreage of land within the floodplain was divided by 5.1. The number derived from this calculation was then added to the total vacant residential designated land. Therefore, the total vacant residential land is divided by 5.1 to calculate the number of dwelling units that could be established with the current vacant residential land within the UGA. This process accurately factors in residential land within the floodplain.

Naches' UGA currently has 33 acres of vacant residential-zoned land. If developed with single-family homes on 7,200 square foot lots within city limits, the area could accommodate 199 new homes. Developing R-2 zoned land at its highest density would increase that number.

Outside city limits, Naches' Urban Growth Area (UGA) contains 42 vacant acres. All residential land in the UGA falls under the County R-1 Zoning District, which allows a maximum density of seven units per acre. If built to capacity, the UGA could support 215 new homes, combining the 199 new homes within the city, the total of 414 exceeds the identified need of 295 homes for the entire area.

Further Staff Findings on the Naches UGA:

The Naches UGA highlights the importance of quantitative and qualitative explanations of LCA reports. The deficit of community facilities stems from the lack of vacant land owned by the Town for future development of new community organization as the population increases. The available land designated for community facilities is owned by the Naches School District, which indicates at this time, the land is expected to be used as community facilities. It is also important to note that based on current numbers from the draft Parks and Recreation Element of Yakima County's comprehensive plan, Naches is projected to have a surplus of 24 acres park parkland to serve its population in 2046. Additional qualitative, on-the-ground factors to consider are the expected completion by fall 2025 of a multi-phased improvement of the sewer treatment facility. Yakima County Fire District #3 (Naches Fire District) is currently in the process of annexing the Town of Naches into their district, which takes into consideration the required fire facilities to serve the population. A review of the Town of Naches' water lines depicts water lines adjacent to the large, residentially zoned lots within the unincorporated and incorporated UGA. Lastly, in 2021 the Town refurbished the Naches Event Center and courts at Clemans View Sports Park, demonstrating support for improvements to existing community facilities.

City/County Collaboration

County staff met with Naches' representatives on June 20, 2024, to discuss proposed future land use designations, evaluate permitted densities, and address Naches' planning issues. Those planning issues are summarized below:

- Discussing and agreeing on the Town's population growth percentage;
- Calculating how the residential areas in the southern part of the UGA and in the floodplain do not count against the Town due to the development constraints caused by the referenced floodplains;
- Expanding the UGA should only occur if it is absolutely necessary to ensure there is 2022 years of growth within the UGA; and,
- Guiding development within the UGA that is in line with the urban design desires of the Town.

County staff met with Naches' representatives on April 17, 2025, to review the current results of the land capacity analysis, reach agreement on the developmental potential and zoning of property within the UGA, and discuss how these fit into the planning goals and issues of the Town.

Major Rezone and Plan Amendment Review Criteria

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 plans, applicable capital facilities plans and official population growth forecasts and allocations;*
- (b) The site is more consistent with the criteria for the proposed map designation than it is with the criteria for the existing map designation;*
- (c) The map amendment or site is suitable for the proposed designation and there is a lack of appropriately designated alternative sites within the vicinity;*
- (d) For a map amendment, substantial evidence or a special study has been furnished that compels a finding that the proposed designation is more consistent with comprehensive plan policies than the current designation;*
- (e) To change a resource designation, the policy plan map amendment must be found to do one of the following:*
 - (i) Respond to a substantial change in conditions beyond the property owner's control applicable to the area within which the subject property lies; or*
 - (ii) Better implement applicable comprehensive plan policies than the current map designation; or*
 - (iii) Correct an obvious mapping error; or*
 - (iv) Address an identified deficiency in the plan. In the case of Resource Lands, the applicable de-designation criteria in the mapping criteria portion of the*

land use subchapter of Yakima County Comprehensive Plan, Volume 1, Chapter I, shall be followed. If the result of the analysis shows that the applicable de-designation criteria has been met, then it will be considered conclusive evidence that one of the four criteria in paragraph (e) has been met. The de-designation criteria are not intended for and shall not be applicable when resource lands are proposed for re-designation to another Economic Resource land use designation;

(f) A full range of necessary public facilities and services can be adequately provided in an efficient and timely manner to serve the proposed designation. Such services may include water, sewage, storm drainage, transportation, fire protection and schools;

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

(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: There are no additional findings to add as the staff's recommendation is to keep the UGA in its current form.

(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: There are no additional findings to add as the staff's recommendation is to keep the UGA in its current form.

- (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: There are no additional findings to add as the staff's recommendation is to keep the UGA in its current form.

- (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: There are no additional findings to add as the staff's recommendation is to keep the UGA in its current form.

- (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: There are no additional findings to add as the staff's recommendation is to keep the UGA in its current form.

Conclusion(s)

1. The County's LCA for Naches calculates a surplus of 8 acres of vacant residentially zoned land, a surplus of 18 acres of vacant commercially zoned land, and a deficit of 25 acres of community facility zoned land within the current UGA for all non-industrial uses through 2046. These surpluses and deficit can accommodate Naches' growth for the next 22 years, warranting no change to the UGA.

Recommendation(s)

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

Attachments:

1. UGA LCA (spreadsheet)
2. County's population projection for Naches
3. *Horizon 2040*'s description of the analytical process for the UGA LCA
4. LCA for City ([Dashboard Link](#))