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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.

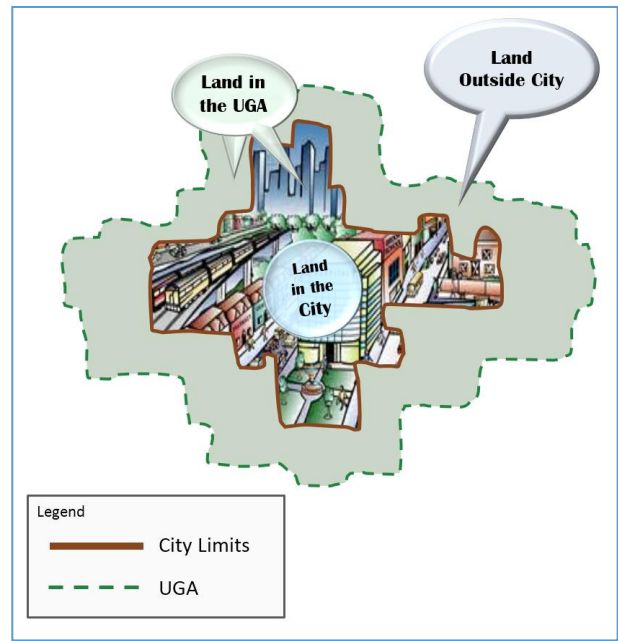
After reviewing OFM's most recent population projections for Yakima County, the Yakima County Planning Division prepared a draft report entitled *Yakima County – Draft 2046 Population Projections and Allocations* that allocated the projected population growth among the county's 14 cities.

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 Toppenish'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 Toppenish's UGA has enough vacant lands to accommodate its non-industrial growth for 329 years. It has a surplus of 385 residentially zoned vacant acres, a surplus of 65 commercially zoned vacant acres, and a surplus of 39 vacant acres owned by providers of community facilities to accommodate projected growth through 2046, as explained below:

1. **Population and Households Analysis:** Based on the City's projected 2024-2046 population growth, this analysis estimates 93 additional households will be added to the city's population by the year 2046.

2046 population forecast for City (City/County consensus)	9,254	people
2024 population in City (OFM's April 1 estimate)	8,915	people
Population change: 2024 – 2046	339	people
Average household size in City: 2020 ²	3.66	people
Future Households in the City 2024 – 2046	93	households

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 93 households) ÷ 43,560 sq. ft. per acre =	<u>18 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

339 people x .0157 acres per person =	<u>5 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:

339 people x 0.0202 acres per person =	<u>7 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	18 acres
(plus) Commercial/retail acreage needed	5 acres
(plus) Community facilities acreage needed	7 acres
Subtotal	30 acres
Equals: Total streets acreage needed (Subtotal x 0.15)	<u>5 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	23 acres
(minus) needed residential acreage, including associated streets	21 acres
Subtotal: Surplus of vacant residentially zoned land within city	<u>2 acres</u>
(plus) current vacant residentially zoned land outside the city	383 acres
Equals: Surplus of vacant residentially zoned land in the UGA	<u>385 acres</u>

b) **Commercially zoned capacity calculation:**

Currently vacant commercial and retail zoned land in city	57 acres
(minus) needed commercial and retail acreage, including associated streets	6 acres
Subtotal: Surplus of vacant commercially zoned land in city	<u>51 acres</u>
(plus) current vacant commercially zoned land outside the city	14 acres
Equals: Surplus of vacant commercially zoned land in the UGA	<u>65 acres</u>

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	47 acres
(minus) need community facility acreage, including associated streets	8 acres
Subtotal: Surplus of vacant community facilities in City	39 acres
(plus) Current vacant community facilities land outside of the city	0 acres
Equals: Surplus of vacant community facilities land in UGA	39 acres

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

Surplus of vacant residentially zoned land	385 acres
(plus) Surplus of vacant commercially zoned land	65 acres
(plus) Surplus of land needed for future community facilities	39 acres
Equals: Surplus of vacant land in non-industrially zoned UGA	489 acres

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

Surplus of vacant land for residential, commercial, community facilities, and streets	92 acres
Equals: Years of growth available in City in 2046	80 years

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

Equals: Years of growth available outside City in 2046	249 years
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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	489 acres
(computed) Market Choice Factor in UGA (MCF)	1397 %
Equals: Years of growth available in UGA in 2046	329 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 UGA has 125 vacant acres but only needs 100 acres for future growth, it has 25% more vacant land than required. This number is the Market Choice Factor.

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

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

$$(524 \div 35) - 1 = 1397\%$$

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 through because Yakima County's land capacity analysis spans 2024–2046 (RCW 36.70A.130(b)).

$$\text{MCF in Years} = (1397\% + 1) \times 22 = 329 \text{ years of growth}$$

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)	21 acres
(plus) Acres needed for future commercial & retail uses (and associated streets)	6 acres
(plus) Acres needed for future community facilities (and associated streets)	8 acres
Equals: Total vacant acres needed for future non-industrial	<u>35 acres</u>
<u>Total amount of currently vacant Non-Industrially Zoned Land in UGA:</u> (vacant residential + vacant commercial/retail uses + vacant community)	<u>524 acres</u>

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	<u>117 acres</u>
Currently developed industrially zoned land outside city	<u>121 acres</u>
Currently vacant industrially zoned land in city	<u>131 acres</u>
Currently vacant industrially zoned land outside city	<u>236 acres</u>
Additionally vacant industrially zoned land need in city	<u>0 acres</u>
Additionally vacant industrially zoned land need outside city	<u>0 acres</u>

Review of Patterns of Development and Densities Permitted in the UGA

The City reported is seeking to attract new businesses within existing industrial and commercial facilities that could then be annexed into the City. However, there are no formal or informal plans within the City department or Council, or discussions with industry ownership, that would warrant a change to the prospective planning and development future for the 2046 Periodic Update.

In addition to reviewing Toppenish'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 Toppenish includes 8 zoning districts within its limits: Residential District (R1), Residential District (R2), Public and Semipublic District (SP), Local Business District (B1), General Business District (B2), Professional Office District (B3), Light Industrial District (M1) and Heavy Industrial District (M2)

Yakima County applies five of its zoning districts to lands in the unincorporated UGA: Single-Family Residential (R-1), Multi-Family Residential (R-3), General Commercial (GC), Highway/Tourist Commercial (HTC), and Light-Industrial (M-1).

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

Toppenish Zoning – Ch. 17 Municipal Code		
Zoning District	Minimum Lot Size	Density
R-1 (Residential)	7,200 sq. ft. lot for single-family dwelling	6 dwelling units per acre
	8,200 sq. ft. lot for two-family dwelling	10 dwelling units per acre
R-2 (Residential)	7,200 sq. ft. lot for single-family dwelling	6 dwelling units per acre
	8,200 sq. ft. lot for two-family dwelling	10 dwelling units per acre
	9,200 sq. ft. lot for multi-family dwelling	12 dwelling units per 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. lot for single-family dwelling	7 dwelling units per acre
R-3 (Multi-Family Residential)	5,250 – 10,000 sq. ft. (depending on use) two-family/multi-family dwelling	12 to 24 dwelling units per acre

Conclusions of the Above Tables

Portions of the City of Toppenish and the unincorporated 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 this, the total number of residential acres within the floodplain was divided by 5.1 (the same number used to calculate the amount of residential acreage needed for future growth). The number derived from this calculation was then added to the total vacant residential designated land. This process accurately factors in residential land within the floodplain.

Within the city limits, Toppenish currently has 13 vacant residential acres outside the floodplain and 49 vacant residential acres located within the floodplain, for a total of 23 vacant residential acres. If developed with single-family residences on 7,200 square foot lots within city limits, the area could accommodate 138 new homes. Developing any R2 zoned property at its highest density would increase that number.

The unincorporated portion of Toppenish's UGA currently has 312 vacant residential acres outside the floodplain and 361 vacant residential acres within the floodplain, for a total of 383 vacant residential acres. Utilizing a density of 5.1 dwelling units per acre and using similar LCA processes that calculate additional residential acreage, the unincorporated UGA could accommodate 1,953 dwelling units.

Under Yakima County Code, the R-1 residential zone permits a maximum density of 7 units per acre, while properties in the R-3 zoning district allow between 12 and 24 dwelling units per acre. Based on these density standards, the existing vacant residential lands within Toppenish have adequate capacity to readily accommodate the additional dwelling units identified in the growth analysis.

To support projected growth over the next 22 years, the analysis determined that 93 additional residential units will be needed to meet anticipated population increases. The current Urban Growth Area (UGA) has sufficient capacity to support this level of development.

1 **City/County Collaboration**

2
3 On Wednesday, July 17, 2024, County staff met with Toppenish representatives to coordinate the
4 City and County planning efforts required by the GMA's 10-year Periodic Update. The agenda
5 included UGA) review with discussions on boundary adjustments and rezone opportunities. Staff
6 presented draft population projections and discussed the Land Capacity Analysis process, including
7 how the County produces maps for LCA model calculations. Additional discussions addressed water
8 and sewer infrastructure planning and appropriate UGA sizing to accommodate projected growth.
9

10 On Tuesday, July 15, 2025, County and City staff reconvened to review the County's land capacity
11 analysis based upon the final, agreed-upon population projections and existing conditions, discuss
12 proposed future land use designations, evaluate and ground-truth zoning categories, and address
13 relevant planning issues. County staff provided the City with access to the Toppenish UGA GIS
14 Dashboard and discussed how this tool can support their ongoing internal discussions and
15 deliberations as they complete their Comprehensive Plan and continue to participate in County
16 Planning Commission and Board of County Commissioners work sessions and hearings.
17

18 County staff presented a comprehensive summary of the 2046 Horizon Periodic Update for the
19 Growth Management Act, including current progress and the schedule for upcoming Planning
20 Commission and Board of County Commissioners work sessions, meetings, and public hearings.
21 Staff emphasized that all proceedings are open to the public and encouraged city participation and
22 input throughout the process. The discussion reiterated coordination requirements between the
23 County and its cities and towns, highlighting the County's commitment to transparency through
24 detailed analytical tools, including the Land Capacity Analysis, Population Allocation and
25 Projections, and city-specific projected growth rates.
26

27 The meeting concluded with a comprehensive review of the LCA/UGA Dashboard, where staff
28 verified analysis totals and conducted mapping reviews to ensure data accuracy and currency. Staff
29 explained and reviewed changes to zone groups within the 100-year floodplain—specifically, lands
30 southwest of the BNSF rail line that were updated to either "residential floodplain constrained" or
31 "environmentally constrained" for non-residential lands. These zoning updates do not preclude
32 development; rather, they establish supplemental building code requirements and flood-resistant
33 construction standards.
34

35 **Major Rezone and Plan Amendment Review Criteria**

36
37 County staff will continue to have collaborative discussions with the City regarding any potential
38 changes to future land use designations or zoning within the unincorporated UGA. Should rezones be
39 proposed, the criteria outlined in this section would be used in joint and ongoing coordination.
40

41 Amendments to the zoning map that are contingent upon legislative approval of a comprehensive
42 plan shall be considered major rezones that are subject to the procedures outlined in YCC Chapter
43 16B.10. Amendments to the zoning map that are contingent upon legislative approval of a
44 comprehensive plan amendment are deemed to be legislative and shall be considered major rezones
45 that are subject to the procedures outlined in YCC Chapter [16B.10](#).
46

47 *(1) The following criteria shall be considered in any review and approval of amendments to Yakima*
48 *County Comprehensive Plan Policy Plan Maps:*
49

50 *(a) The proposed amendment is consistent with the Growth Management Act and*
51 *requirements, the Yakima County Comprehensive Plan, the Yakima Urban Area*

- 1 *Comprehensive Plan and applicable sub-area plans, applicable city comprehensive*
2 *plans, applicable capital facilities plans and official population growth forecasts and*
3 *allocations;*
4 (b) *The site is more consistent with the criteria for the proposed map designation than it is*
5 *with the criteria for the existing map designation;*
6 (c) *The map amendment or site is suitable for the proposed designation and there is a lack of*
7 *appropriately designated alternative sites within the vicinity;*
8 (d) *For a map amendment, substantial evidence or a special study has been furnished that*
9 *compels a finding that the proposed designation is more consistent with comprehensive*
10 *plan policies than the current designation;*
11 (e) *To change a resource designation, the policy plan map amendment must be found to do*
12 *one of the following:*
13 (i) *Respond to a substantial change in conditions beyond the property owner's*
14 *control applicable to the area within which the subject property lies; or*
15 (ii) *Better implement applicable comprehensive plan policies than the current map*
16 *designation; or*
17 (iii) *Correct an obvious mapping error; or*
18 (iv) *Address an identified deficiency in the plan. In the case of Resource Lands, the*
19 *applicable de-designation criteria in the mapping criteria portion of the land use*
20 *subchapter of Yakima County Comprehensive Plan, Volume I, Chapter I, shall be*
21 *followed. If the result of the analysis shows that the applicable de-designation*
22 *criteria has been met, then it will be considered conclusive evidence that one of*
23 *the four criteria in paragraph (e) has been met. The de-designation criteria are*
24 *not intended for and shall not be applicable when resource lands are proposed*
25 *for re-designation to another Economic Resource land use designation;*
26 (f) *A full range of necessary public facilities and services can be adequately provided in an*
27 *efficient and timely manner to serve the proposed designation. Such services may include*
28 *water, sewage, storm drainage, transportation, fire protection and schools;*
29 (g) *The proposed policy plan map amendment will not prematurely cause the need for nor*
30 *increase the pressure for additional policy plan map amendments in the surrounding*
31 *area.*
32

33 Findings: Any zoning map amendments will be processed as a major rezone in accordance with
34 YCC Chapter 16B.10, and all applicable review criteria, including consistency with the Growth
35 Management Act and the Comprehensive Plan, will be fully addressed during the amendment
36 process.
37

- 38 (2) *The following criteria shall be considered in any review and approval of changes to Urban*
39 *Growth Area (UGA) boundaries:*
40 (a) *Land Supply:*
41 (i) *The amount of buildable land suitable for residential and local commercial*
42 *development within the incorporated and the unincorporated portions of the*
43 *Urban Growth Areas will accommodate the adopted population allocation and*
44 *density targets;*
45 (ii) *The amount of buildable land suitable for purposes other than residential and*
46 *local commercial development within the incorporated and the unincorporated*
47 *portions of the Urban Growth Areas will accommodate the adopted forecasted*
48 *urban development density targets within the succeeding twenty-year period;*
49 (iii) *The Planning Division will use the definition of buildable land in YCC*
50 *[16B.02.045](#), the criteria established in RCW [36.70A.110](#) and .130 and applicable*
51 *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. A table showing the cumulative impacts of
38 all proposed amendments being considered in 2025 will also be provided as part of the SEPA
39 analysis.
40

- 41 (5) *Plan policy and other text amendments including capital facilities plans must be consistent with*
42 *the GMA, SMA, CWPP, other comprehensive plan goals and policies, and, where applicable, city*
43 *comprehensive plans and adopted inter-local agreements.*
44

45 Findings: This criterion is not applicable. Any modifications to Toppenish's Urban Growth Area
46 would be addressed through map amendments rather than through changes to comprehensive
47 plan policies or text.
48

- 49 (6) *Prior to forwarding a proposed development regulation text amendment to the Planning*
50 *Commission for its docketing consideration, the Administrative Official must make a*
51 *determination that the proposed amendment is consistent with the GMA, CWPP, other*

1 *comprehensive plan goals and policies, and, where applicable, city comprehensive plans and*
2 *adopted inter-local agreements.*

3
4 Findings: This criterion is not applicable. Any modifications to Toppenish's Urban Growth Area
5 would be addressed through map amendments rather than through changes to comprehensive
6 plan policies or text.
7

8 9 **Conclusion(s)**

- 10 1. The County's LCA for Toppenish calculates a surplus of 385 acres of vacant residentially
11 zoned land, a surplus of 65 acres of vacant commercially zoned land, and a surplus of 39
12 vacant land for community facilities and all associated streets in the current UGA for all
13 non-industrial uses through 2046. Overall, this represents a surplus of 489 acres beyond
14 what is needed to accommodate the City's projected growth through 2046, providing
15 capacity for approximately 329 years of development (from 2024).
16
17 2. This Land Capacity Analysis finds that Toppenish's current city limits would
18 accommodate the City's growth for 80 years (from 2024) and that the UGA could
19 accommodate the City's growth for 329 years (from 2024). Because the GMA requires the
20 UGA to accommodate growth for only 22 years (i.e., from 2024 to 2046), the UGA should
21 not be expanded but could be reduced in size.
22

23 **Recommendation(s)**

- 24
25 1. County Planning staff recommends no additions or removals to the City of Toppenish's
26 UGA at this time, as staff aims to continue examining and engaging with the City on
27 areas to remove from the UGA when and or where adequate can be spent on public
28 engagement and planning for water, sewers, and streets.
29
30 2. County Planning staff recommends no changes to the comprehensive plan designations or
31 zoning in Toppenish's unincorporated UGA.
32

33 **Attachments:**

- 34
35 1. UGA LCA (spreadsheet)
36 2. County's population projection for Toppenish
37 3. *Horizon 2040's* description of the analytical process for the UGA LCA
38 4. LCA for City (map) Forthcoming
39