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

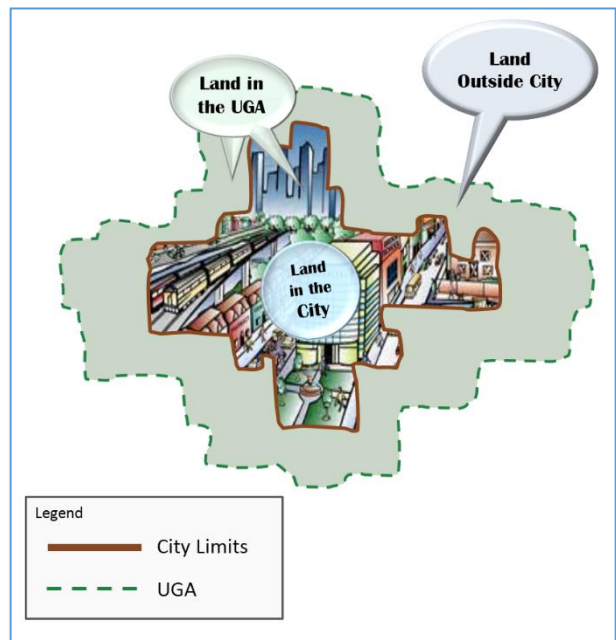
A Land Capacity Analysis (LCA) is an essential component in reviewing a UGA. An LCA is a quantitative estimate of how much land a Town or City will require as it grows over the succeeding 20-year period. It begins with consultation between a county and its cities and towns to select a population growth 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 Town or 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 Town or City:** This is used to describe lands within the Town limit.
- 2) **Land outside Town or 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 Town's current area plus the areas the Town 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 Harrah'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
(plus) Acres needed for future industrial

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.

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 Harrah’s UGA has enough vacant lands to accommodate its non-industrial growth for 510 years. It has a surplus of 244 residentially zoned vacant acres, a surplus of 55 commercially zoned vacant acres, and a surplus of 37 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 Town’s projected 2024-2046 population growth, this analysis estimates 93 additional households will be added to the Town’s population by the year 2046.

2046 population forecast for Town (Town/County consensus)	618 people
2024 population in Town (OFM’s April 1 estimate)	585 people
Population change: 2024 – 2046	33 people
Average household size in Town: 2020 ²	3.08 people
Future Households in the Town 2024 – 2046	11 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 11) ÷ 43,560 households per acre =	2 acres
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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 Town.

33 people x 0.0051 acres per person =	0.17 acres
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² Taken from Table S1101 – 5-Year American Community Survey

- 1 **4. Future Community Facilities Land Need:** The acreage needed for future community
2 facilities growth through 2046 was calculated by multiplying the projected population
3 increase by the current per person acreage of developed community facilities land within
4 the Town:
5

33 people x 0.0855 acres per person =	3 acres
---------------------------------------	----------------

- 6
7 **5. Future Streets Land Need:** The acreage needed for future rights-of-way to accommodate
8 streets and utilities through 2046 was calculated by multiplying the acreage needed for
9 future residential, commercial and retail, and community facilities by 15%:
10

Residential acreage needed	2 acres
(plus) Commercial/retail acreage needed	0 acres
(plus) Community facilities acreage needed	1 acres
Subtotal	3 acres
Equals: Total streets acreage needed (Subtotal x 0.15)	3.45 acres

11
12 **6. Land Capacity Analysis (LCA)**³
13

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

17
18 The current acreage of vacant non-industrially zoned land is compared to the calculated needs
19 for future non-industrial land uses.

20 **a) Residentially zoned capacity calculation:**
21

Currently vacant residentially zoned in the Town (excluding floodplains)	8 acres
(minus) needed residential acreage, including associated streets	(2) acres
Subtotal: Surplus of vacant residentially zoned land within Town	6 acres
(plus) current vacant residentially zoned land outside the Town	31 acres
Equals: Surplus of vacant residentially zoned land in the UGA	37 acres

22 **b) Commercially zoned capacity calculation:**
23

Currently vacant commercial and retail zoned land in Town	1 acres
(minus) needed commercial and retail acreage, including associated streets	0.17 acres
Subtotal: Surplus of vacant commercially zoned land in Town	1 acres
(plus) Surplus current vacant commercially zoned land outside the Town	0 acres
Equals: Surplus of vacant commercially zoned land in the UGA	.83 acres

24 **c) Community facilities capacity:**
25

Current vacant community facilities land in Town	3 acres
(minus) need community facility acreage, including associated streets	(3) acres
Subtotal: Surplus of vacant community facilities in Town	0 acres

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

(plus) Currently vacant community facilities land outside of the Town	0 acres
Equals: Surplus of vacant community facilities land in UGA	0 acres

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

Surplus of vacant residentially zoned land	37 acres
(plus) Surplus of vacant commercially zoned land	1 acres
(plus) (Surplus) of land needed for future community facilities	0 acres
Equals: Surplus of vacant land in non-industrially zoned UGA	38 acres

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

Surplus of vacant land for residential, commercial, community facilities, and streets	7 acres
Equals: Years of growth available in Town in 2046	53 years

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

Equals: Years of growth available outside Town in 2046	136 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	38 acres
(computed) Market Choice Factor in UGA (MCF)	760 %
Equals: Years of growth available in UGA in 2046	189 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 25% is the Market Choice Factor.

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

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

$$(38 \div 3) - 1 = 760\%$$

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)).

$$\text{MCF in Years} = (760\% + 1) \times 22 = 189 \text{ years of growth}$$

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)	2 acres
(plus) Acres needed for future commercial & retail uses (and associated streets)	0 acres
(plus) Acres needed for future community facilities (and associated streets)	1 acres
Equals: Total vacant acres needed for future non-industrial	<u>3 acres</u>
<u>Total amount of currently vacant Non-Industrially Zoned Land in UGA:</u> (vacant residential + vacant commercial/retail uses + vacant community)	<u>47 acres</u>

7. Future industrial land needs:

As outlined in the "Urban Lands" section of the Land Use Element, the Town 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 Town	7 acres
Currently developed industrially zoned land outside Town	0 acres
Currently vacant industrially zoned land in Town	2 acres
Currently vacant industrially zoned land outside Town	0 acres
Additionally vacant industrially zoned land need in Town	0 acres
Additionally vacant industrially zoned land need outside Town	0 acres

Review of Patterns of Development and Densities Permitted in the UGA

In addition to reviewing Harrah'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 Town of Harrah is in the process of codifying and publishing their municipal codes. The full rendition of these codes are not available at the time of writing this staff report. Harrah's zoning district that allows residential used is "Residential Zoning (R-1). The zoning districts and their corresponding minimum lot sizes and maximum densities are as follows and analyzed below.

Yakama Nation land within the Town limits is not subject to Yakima County's or Harrah's jurisdiction, and therefore, is not included in the LCA.

Zoning District	Minimum Lot Size	Notes
Residential	7,200 sq. ft., 6 DU/acre max.	Max. lot coverage is 40%
	Minimum area per dwelling = 850 sq. ft. for single family; 500 sq. ft. for multi-family	Multi-family up to 4 dwelling units, 1 structure / lot.
		Conditional Use, Multifamily containing 5 or more dwelling units

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-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 Above Tables

The Town of Harrah currently has 6 acres of surplus vacant residential-zoned land. If developed with single-family homes on 7,000 square foot lots within Town limits, the area could accommodate 31 new homes. Developing multi-family zoned land at its highest density would increase that number.

$$6 \text{ acres} \times .85 \text{ (i.e., .15 is computed for streets)} = 5.1 \text{ acres available for DU's}$$

$$5.1 \text{ acres} \times 6 \text{ DU/acre} = 31 \text{ dwelling units}$$

Therefore, the 11 units projected through 2046 could be accommodated by the Town's current development regulations, and provided that urban water and sewer services are concurrently provided.

The unincorporated portion of Harrah's UGA currently has 37 vacant residential acres outside Town's limits. Utilizing a density of 5.1 dwelling units per acre, the same density that calculates additional residential acreage needed for development, the unincorporated UGA could accommodate 160 dwelling units.

$$37 \text{ acres} \times .85 \text{ (i.e., .15 is computed for streets)} = 31.4 \text{ acres available for DU's}$$

$$31.4 \text{ acres} \times 5.1 \text{ DU/acre} = 160 \text{ dwelling units}$$

Under Yakima County Code, the R-1 residential zone permits a maximum density of 7 units per acre. Based on these density standards, the existing vacant residential lands within Harrah 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 11 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. If built to capacity the UGA could support 189 new homes—far exceeding the identified need for the entire area.

Town/County Collaboration

County staff met with Harrah's representatives on June 13, 2024, and again on August 21, 2025. The Yakima Valley Conference of Governments Organization (YVCOG) was present at the August 2025 meeting, where County staff laid out the steps in the LCA/UGA process. In 2024, a 0.25 growth rate was agreed upon based on discussions and review of the projected population estimates, ultimately providing the basis for the growth projections in this report and in the April 4, 2025 "2046 Population Projects and Allocations" report

The meetings were structured to review the County's land capacity analysis, discuss proposed future land use designations, growth and patterns of development, evaluate permitted densities, and address community and utility planning issues. Population projections were discussed with some questioning by the Town about methods and draft numbers. Community lands comprising an area in the Town Square (Park) were discussed and reviewed for future development, along with Yakama Nation ownership and both infill and UGA vacancies.

Throughout the summer of 2025, collaborative efforts continued to review and analyze the LCA results. One issue that arose was the potential to expand the Harrah UGA by adding three adjacent parcels owned by the Mount Adams School District, located east of the District's K-8 school on Branch and Field roads. However, these parcels are designated as agricultural resource lands of long-term significance in Yakima County's Comprehensive Plan, Horizon 2040. Because the Harrah UGA has sufficient capacity to accommodate growth for the 22-year planning period, conducting a swap with these agricultural lands is not currently allowed under RCW 36.70A.130(3)(c)(ii).

While Harrah has sufficient capacity for growth through the 2046 planning horizon, the current GMA restrictions on UGA expansion into agricultural lands can create barriers for many jurisdictions. This limitation is particularly relevant for towns and cities in Yakima County that are surrounded by adjacent agricultural lands. Over time, the inability to consider targeted swaps can effectively prevent jurisdictions from expanding, even when expansion may be critical to their economic stability, long-term viability, and practicable development patterns.

Further Staff Findings on Harrah's UGA

On August 21, 2025, County and Town participants addressed the deficit of vacant properties within the current Town limits since large areas are in tribal trust or Yakama Nation ownership. These lands are not factored into the calculations and jurisdiction on land-use rests with the Nation. This underscores the need for continued collaboration with the tribes and comprehensive analysis on both costs and opportunities of providing urban-level services to properties, future zoning schemes, and UGA decisions.

Finally, ~15 vacant parcels represent 7.8 acres of residential infill opportunities within Town limits. Two vacant parcels, each ~15 acres, make up the bulk of the vacant residentially zoned development opportunity in the southern portion of the unincorporated UGA.

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 Town 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;*

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

3 (i) Respond to a substantial change in conditions beyond the property owner's
4 control applicable to the area within which the subject property lies; or

5 (ii) Better implement applicable comprehensive plan policies than the current map
6 designation; or

7 (iii) Correct an obvious mapping error; or

8 (iv) Address an identified deficiency in the plan. In the case of Resource Lands, the
9 applicable de-designation criteria in the mapping criteria portion of the land
10 use subchapter of Yakima County Comprehensive Plan, Volume 1, Chapter I,
11 shall be followed. If the result of the analysis shows that the applicable de-
12 designation criteria has been met, then it will be considered conclusive
13 evidence that one of the four criteria in paragraph (e) has been met. The de-
14 designation criteria are not intended for and shall not be applicable when
15 resource lands are proposed for re-designation to another Economic Resource
16 land use designation;

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

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

23
24 Findings: There are no additional findings to add as the staff's recommendation is to keep the
25 UGA in its current form.

26
27 (2) The following criteria shall be considered in any review and approval of changes to Urban
28 Growth Area (UGA) boundaries:

29 (a) Land Supply:

30 (i) The amount of buildable land suitable for residential and local commercial
31 development within the incorporated and the unincorporated portions of the
32 Urban Growth Areas will accommodate the adopted population allocation and
33 density targets;

34 (ii) The amount of buildable land suitable for purposes other than residential and
35 local commercial development within the incorporated and the unincorporated
36 portions of the Urban Growth Areas will accommodate the adopted forecasted
37 urban development density targets within the succeeding twenty-year period;

38 (iii) The Planning Division will use the definition of buildable land in YCC
39 [16B.02.045](#), the criteria established in RCW [36.70A.110](#) and .130 and
40 applicable criteria in the Comprehensive Plan and development regulations;

41 (iv) The Urban Growth Area boundary incorporates the amount of land determined
42 to be appropriate by the County to support the population density targets;

43 (b) Utilities and services:

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

48 (ii) Designated Ag. resource lands, except for mineral resource lands that will be
49 reclaimed for urban uses, may not be included within the UGA unless it is

1 *shown that there are no practicable alternatives, and the lands meet the de-*
2 *designation criteria set forth in the comprehensive plan.*

3
4 Findings: There are no additional findings to add as the staff's recommendation is to keep the
5 UGA in its current form.

- 6
7 (3) *Land added to or removed from Urban Growth Areas shall be given appropriate policy plan*
8 *map designation and zoning by Yakima County, consistent with adopted comprehensive*
9 *plan(s).*

10
11 Findings: There are no additional findings to add as the staff's recommendation is to keep the
12 UGA in its current form.

- 13
14 (4) *Cumulative impacts of all plan amendments, including those approved since the original*
15 *adoption of the plan, shall be considered in the evaluation of proposed plan amendments.*

16
17 Findings: A table showing the cumulative impacts of all proposed amendments being
18 considered in 2025 will be provided as part of the SEPA analysis.

- 19
20 (5) *Plan policy and other text amendments including capital facilities plans must be consistent*
21 *with the GMA, SMA, CWPP, other comprehensive plan goals and policies, and, where*
22 *applicable, Town comprehensive plans and adopted inter-local agreements.*

23
24 Findings: Not applicable, as the staff's recommendation is to keep the UGA in its current form.

25
26 **Conclusion(s)**

- 27
28 1. The County's LCA for Harrah represents a surplus of 40 acres of vacant residentially zoned land
29 and a surplus of 4.5 acres of vacant commercially zoned land within the current UGA for all non-
30 industrial uses through 2046. These surpluses create a 1,567% MCF, warranting a potential
31 reduction in the town's UGA.

32
33 **Recommendation(s)**

- 34
35 1. County Planning staff recommends no additions or removals to the Town of Harrah's UGA at this
36 time, as staff aims to continue examining and engaging with the Town on areas to add, rezone, and
37 remove from the UGA when more time can be spent on public engagement and planning for water,
38 sewers, and streets.
39
40 2. County Planning staff recommends no changes to the comprehensive plan designations or zoning
41 in Harrah's unincorporated UGA.

42
43 **Attachments:**

- 44
45 1. UGA LCA (spreadsheet)
46 2. County's population projection for Town
47 3. ***Horizon 2040***'s description of the analytical process for the UGA LCA
48 4. Map A: Town of Harrah - Current and Proposed Zoning
49 5. Map B: Town of Harrah - Current and Proposed Land-Use Designations
50 6. Map C: Town of Harrah – Staff Recommended UGA Proposal

	Units	Harrah
1 - Population and Households Analysis		
2046 population for City (County's preferred alternative medium projection)	people	618
2024 population in City (OFM's April 1 estimate)	people	585
City's projected population increase, 2024-46 (a - b)	people	33
City's average household size (2020 Census - 5 Year Estimates) Table S1101	people per household	3.08
Additional households projected for City, 2024-46 (c + d)	households	11
2 - Future Residential Land Need		
Desired average density of future housing, 2024-46 (5.1 dwelling units per acre)	per dwelling acre	8,500
Land needed for future housing, 2024-2046 (e • f + 43,560 sq. ft. per acre)	acres	2
3 - Future Commercial & Retail Land Need		
Current developed commercial & retail land in City (from GIS analysis)	acres	4
Current developed commercial & retail land in City per person (h + b)	acres per person	0.0068
Land needed for future commercial & retail, 2024-46 (i • c)	acres	0.17
4 - Future Community Facilities* Land Need		
Current developed community facilities land in City (from GIS analysis)	acres	50
Current developed community facilities land in City per person (k + b)	acres per person	0.0855
Land needed for future community facilities, 2024-46 (m • c)	acres	3
5 - Future Streets Land Need		
Subtotal of land needed for future residential, commercial & retail, and community facilities 2024-46 (g + j + n)	acres	5
Land needed for future streets (p • 15%)	acres	0.45
6 - Land Capacity Analysis		
Residentially-zoned capacity		
Current vacant residentially-zoned land in City, excluding floodplains (from GIS analysis)	acres	8
(plus) Current vacant residentially-zoned land in City, only including floodplains (from GIS analysis)	acres	0
= Current vacant residentially-zoned land in City (r + (s/5.1))	acres	8
(minus) Land needed for future housing and associated streets, 2024-46 (-g • 115%)	acres	(2)
= Surplus (Deficit) of vacant residentially-zoned land in City (t + u)	acres	6
Current vacant residentially-zoned land outside City, excluding floodplains (from GIS analysis)	acres	31
(plus) Current vacant residentially-zoned land outside City, only in floodplains (from GIS analysis)	acres	0
= Current vacant residentially-zoned land outside City (w + (x/5.1))	acres	31
(plus) Surplus (Deficit) of vacant residentially-zoned land in City (v)	acres	6
= Surplus (Deficit) of vacant residentially-zoned land in UGA in 2046 (y + z)	acres	37
Commercially-zoned capacity		
Current vacant commercially-zoned land in City (from GIS analysis)	acres	1
(minus) Land needed for future commercial & retail and associated streets, 2024-46 (-j • 115%)	acres	0
= Surplus (Deficit) of vacant commercially-zoned land in City (bb + cc)	acres	1
Current vacant commercially-zoned land outside City (from GIS analysis)	acres	0
(plus) Surplus (Deficit) of vacant commercially-zoned land in City in 2046 (dd)	acres	1
= Surplus (Deficit) of vacant commercially-zoned land in UGA in 2046 (ee + ff)	acres	1
Community Facilities capacity		
Current vacant community facilities land in City (from GIS analysis)	acres	3
(minus) Land needed for future community facilities and associated streets, 2024-46 (-n • 115%)	acres	(3)
= Surplus (Deficit) of vacant community facilities in City (hh + ii)	acres	0
Current vacant community facilities land outside City (from GIS analysis)	acres	0
(plus) Surplus (Deficit) of vacant community facilities land in City in 2046 (jj)	acres	0
= Surplus (Deficit) of vacant community facilities land in UGA in 2046 (kk + mm)	acres	0
Capacity for growth in City (excluding Industrial growth)		
Surplus (Deficit) of vacant land for residential, commercial, community facilities, & streets (v + dd + jj)	acres	7
Computed Market Choice Factor in City (MCF)**	%	140%
Years of growth available in City in 2046 ((qq + 1) • 22)	years	53
Capacity for growth outside City (excluding Industrial growth)		
Years of growth available outside City in 2046 (vv - rr)	years	136
Capacity for growth in UGA (excluding Industrial growth)		
Surplus (Deficit) of vacant land for residential, commercial, community facilities, & streets (aa + gg + nn)	acres	38
Computed Market Choice Factor in UGA (MCF)***	%	760%
Years of growth available in UGA in 2046 ((rr + 1) • 22)	years	189
7 - Future Industrial Land Need		
Current developed industrially-zoned land in City (from GIS analysis)	acres	7
Current developed industrially-zoned land outside City (from GIS analysis)	acres	0
Current vacant industrially-zoned land in City (from GIS analysis)	acres	2
Current vacant industrially-zoned land outside City (from GIS analysis)	acres	0
Industrial acres to add to UGA (based on City's economic development strategy) (from GIS analysis)	acres	0
Industrial acres to remove from UGA (based on City's economic development strategy) (from GIS analysis)	acres	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

Table 8. Cities, Towns, & County Consensus Population Projections and Allocations, 2025-2046

	2020 Census	Cities, Towns, & County Consensus Annual Growth Rates (2025-2046) ⁴	2021 OFM April 1 Estimate	2022 OFM April 1 Estimate	2023 OFM April 1 Estimate	2024 OFM April 1 Estimate	2025	2026	2027	2028	2029	2030	2031	2032
Yakima County (Preferred Alt.)	256,728	0.56%	258,100	259,950	261,200	263,200	264,662	266,133	267,611	269,098	270,593	272,097	273,608	275,129
Unincorporated	88,147		88,240	88,955	89,155	89,635	89,742	89,840	89,931	90,013	90,087	90,153	90,209	90,257
Incorporated	168,581		169,860	170,995	172,045	173,565	174,921	176,293	177,680	179,085	180,506	181,944	183,399	184,872
Grandview	10,910	1.00%	10,960	11,020	11,250	11,680	11,797	11,915	12,034	12,154	12,276	12,399	12,523	12,648
Granger	3,624	1.21%	3,690	3,740	3,775	3,815	3,861	3,908	3,956	4,004	4,052	4,101	4,151	4,202
Harrah	585	0.25%	580	580	580	585	586	588	589	591	592	594	595	597
Mabton	1,959	-1.21%	1,975	1,975	1,965	1,965	1,941	1,918	1,895	1,872	1,849	1,827	1,805	1,783
Moxee	4,326	2.92%	4,405	4,665	4,785	4,820	4,961	5,105	5,254	5,408	5,566	5,728	5,895	6,067
Naches	1,084	1.98%	1,110	1,125	1,120	1,125	1,147	1,170	1,193	1,217	1,241	1,265	1,290	1,316
Selah	8,153	1.75%	8,235	8,365	8,450	8,620	8,771	8,924	9,081	9,239	9,401	9,566	9,733	9,903
Sunnyside	16,375	0.80%	16,400	16,500	16,530	16,570	16,703	16,836	16,971	17,107	17,243	17,381	17,520	17,661
Tieton	1,389	2.50%	1,430	1,505	1,545	1,600	1,640	1,681	1,723	1,766	1,810	1,856	1,902	1,949
Toppenish	8,854	0.17%	8,870	8,870	8,900	8,915	8,930	8,945	8,961	8,976	8,991	9,006	9,022	9,037
Union Gap	6,568	1.00%	6,595	6,640	6,660	6,660	6,727	6,794	6,862	6,930	7,000	7,070	7,140	7,212
Wapato	4,607	0.25%	4,610	4,615	4,620	4,625	4,637	4,648	4,660	4,671	4,683	4,695	4,707	4,718
Yakima	96,968	0.62%	97,810	98,200	98,650	99,370	99,985	100,604	101,227	101,853	102,484	103,118	103,756	104,398
Zillah	3,179	0.63%	3,190	3,195	3,215	3,215	3,235	3,256	3,276	3,297	3,318	3,339	3,360	3,381

⁴ These annual growth rates are applied to the 2024 population figures and to each subsequent year.

Table 8 (cont.). Cities, Towns, & County Consensus Population Projections and Allocations, 2025-2046														
	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046
Yakima County (Preferred Alt.)	276,657	278,194	279,740	281,294	282,857	284,428	286,009	287,598	289,196	290,802	292,418	294,043	295,676	297,319
Unincorporated	90,295	90,323	90,341	90,350	90,348	90,335	90,311	90,276	90,229	90,171	90,100	90,017	89,921	89,812
Incorporated	186,363	187,871	189,398	190,944	192,509	194,094	195,698	197,322	198,966	200,632	202,318	204,026	205,756	207,508
Grandview	12,774	12,902	13,031	13,161	13,293	13,426	13,560	13,696	13,833	13,971	14,111	14,252	14,394	14,538
Granger	4,253	4,304	4,356	4,409	4,463	4,517	4,572	4,627	4,684	4,740	4,798	4,856	4,915	4,975
Harrah	598	600	601	603	604	606	607	609	610	612	613	615	616	618
Mabton	1,761	1,740	1,719	1,698	1,678	1,657	1,637	1,618	1,598	1,579	1,560	1,541	1,522	1,504
Moxee	6,244	6,426	6,614	6,807	7,006	7,210	7,420	7,637	7,860	8,089	8,325	8,568	8,818	9,076
Naches	1,342	1,369	1,396	1,423	1,452	1,480	1,510	1,540	1,570	1,601	1,633	1,665	1,698	1,732
Selah	10,077	10,253	10,432	10,615	10,801	10,990	11,182	11,378	11,577	11,779	11,986	12,195	12,409	12,626
Sunnyside	17,802	17,944	18,088	18,233	18,378	18,526	18,674	18,823	18,974	19,125	19,278	19,433	19,588	19,745
Tieton	1,998	2,048	2,099	2,152	2,206	2,261	2,317	2,375	2,435	2,495	2,558	2,622	2,687	2,755
Toppenish	9,052	9,068	9,083	9,099	9,114	9,130	9,145	9,161	9,176	9,192	9,207	9,223	9,239	9,254
Union Gap	7,284	7,357	7,430	7,505	7,580	7,655	7,732	7,809	7,887	7,966	8,046	8,126	8,208	8,290
Wapato	4,730	4,742	4,754	4,766	4,778	4,790	4,802	4,814	4,826	4,838	4,850	4,862	4,874	4,886
Yakima	105,044	105,695	106,349	107,007	107,669	108,336	109,006	109,681	110,360	111,043	111,730	112,422	113,118	113,818
Zillah	3,402	3,424	3,445	3,467	3,489	3,511	3,533	3,555	3,577	3,600	3,623	3,646	3,669	3,692

~~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.

5.8.3.2 Urban Land Use Categories

The Urban land use categories for the unincorporated UGAs are determined in a coordinated process between the County and each of the fourteen cities and towns during the Growth

5.8.5 Urban Land Lands – Future Land Use Needs

To ensure Yakima County has not restricted the supply of urban land through its population allocations, the OFM 2040 medium projection of 318,494 is used throughout the entire Land Use Element to calculate the adequacy of the available land supply. If recent trends continue, approximately 63 percent of this figure, or 200,511 people, will be living in the cities or towns by the year 2040. Based on these same trends, approximately 11 percent of the population in the year 2040, or 38,359 people, will be living within the unincorporated UGAs. If these figures hold, the total urban population in 2040 will equal 238,870. Once the population has been projected the Growth Management Act requires Yakima County to determine the necessary amount of land needed for future growth. The Land Capacity Analysis (LCA), is the tool for which Yakima County sizes UGA boundaries.

5.8.5.1 Countywide Urban Growth Area Land Capacity Analysis

The Land Capacity Analysis (LCA), as outlined in subsection 5.8.3.1 above, is a quantitative estimate of how much vacant land (i.e., land available for future urban development) a city (and unincorporated UGA) currently has and will require as it grows over the succeeding 20-year period. It begins with consultation between Yakima County and each of its cities and towns to select a population growth projection from a range of population growth projections provided by 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. The LCA quantifies the amount of vacant land needed for each city and town's growth then compares those results to the amount of vacant land currently within the UGA. This will determine if there is a surplus or a deficit of vacant land for future growth to year 2040. A more detailed description of the LCA is outlined in the example below:

- **Quantity of Land Calculations for Non-Industrial Uses**

1. **Population and Households Analysis:** Using a city's projected 2015-2040 population growth, this analysis estimates the number of additional households that will be added to the city's population by the year 2040. An example city is described below:

2040 population forecast for city (County Planning)	Example 1000 people
2015 population in city (OFM's April 1 estimate)	Example 500 people
Population increase in city 2015-2040	Example 500 people
<u>Average household size in city (2010 Census)</u>	<u>Example 2.87 people</u>
Additional households in city 2015-2040 (500 ÷ 2.87)	Example 174 households

2. **Future Residential Land Need:** The acreage needed for future residential growth through 2040 is 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:

$$8,500 \text{ sq. ft.} \times 174 \text{ households} = 1,479,000 \text{ sq. ft.} / 43,560 \text{ sq. ft. (1 acre)} = 34 \text{ acres}$$

3. Future Commercial & Retail Land Need: The acreage needed for future commercial and retail growth through 2040 is calculated by multiplying the projected population increase by the current per capita acreage of developed commercially-zoned lands within the city after subtracting the acreage classified for community facilities (as determined by GIS analysis):

$$500 \text{ people} \times 0.0169 \text{ acres per capita} = 8 \text{ Acres}$$

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

$$500 \text{ people} \times 0.0494 \text{ acres per capita} = 25 \text{ Acres}$$

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

Residential acreage needed	34 Acres +	5.1 Acres for streets
+ Commercial/retail acreage needed	8 Acres +	1.2 Acres for streets
+ Community facilities acreage needed	<u>25 Acres +</u>	<u>3.75 Acres for streets</u>
= Subtotal of total streets acreage	(67 Acres x 0.15) = 10.05 Acres for streets	

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

Total amount of vacant land needed in UGA for future growth (excluding industrial growth): Adding the needed acres from the categories above results (including streets) in the total acreage calculated below:

Acres needed for future residential uses	39.1 Acres
+Acres needed for future commercial & retail uses	9.2 Acres
+Acres needed for future community facilities	<u>28.75 Acres</u>
=Total vacant acres needed for future non-industrial uses	77.05 Acres

7. Current Vacant Land Analysis:

Yakima County's Division of Geographic Information Services (GIS) determines the current acreage of developed residential, commercial & retail, and community facilities. GIS also determines the acreage of current vacant land and partially vacant land in each zoning district. In this example city, summaries of whether each zoning

group has a surplus or a deficit of vacant land to accommodate the projected growth through 2040 are listed in Table below:

Table 5.8.5.1-1 Example Land Capacity Analyses (LCA) Summary – Excluding Industrially-zoned Land					
Zoning Group	Total Acres Within City Limits	Outside City Limits & Within Current UGA	Total: Within City Limits and Within Current UGA	Total Acres needed from Step 6 above	Determination of Surplus or Deficit
Residential	Vacant: 13 acres	Vacant: 51 acres	Vacant: 64 Acres	39.1 acres	<i>Surplus: 24.9 acres</i>
Commercial	Vacant: 18 acres	Vacant: 34 acres	Vacant: 52 Acres	9.2 acres	<i>Surplus: 42.8 acres</i>
Community Facilities	Vacant: 0 acres	Vacant: 0 acres	Vacant: 0 Acres	28.75 acres	<i>Deficit: 28.75 acres</i>
Total of above Zoning Groups	Vacant: 31 acres	Vacant: 85 acres	Vacant: 116 Acres	77.05 acres	<i>Surplus: 38.95 acres</i>

Based on the example shown in the Table above, there is roughly a total of 116 vacant acres inside the UGA and based on the LCA in steps 1 through 6 the example city needed roughly 77.05 acres for next twenty plus years of growth, which means there is a surplus of 38.95 acres available in the current UGA to accommodate growth through 2040.

8. 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 city and within its UGA is to express the surplus (or deficit) as a percentage of the amount of vacant land that is needed for growth over the 25-year period from 2015 to 2040. In our example above, the city has 116 vacant acres and needs 77.05 vacant acres for future growth, it has 51% more vacant land than needed for growth. So the Computed MCF is 51%, as calculated below:

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

Example: $[116 \text{ acres} \div 77.05 \text{ acres}] - 1.00 = 0.51 = 51\%$

The example city has a 51% MCF, which means that there is 51% more vacant land than needed for growth over the twenty-five year period from 2015 to 2040. In Yakima County, the MCF is set by policy within **Horizon 2040** at 10%. 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. The calculation below outlines how to determine the years of growth for our example city.

$$(\text{Computed MCF} + 1) \times 25 \text{ years} = \text{years of growth available}$$

Example 1: $(51\% \text{ MCF} + 1) \times 25 \text{ years} = 37.75 \text{ years of growth available}$

Table 5.8.5.1-2 Example MCF and Years of Growth	
	Within the Current UGA
	Vacant: 116 acres
Market Choice Factor	51%
Years of Growth	37.75 years

The figures for both the “MCF” and “years of growth” metrics for the example city show that the MCF of 51% exceeds the plan policy standard of 10% and the years of growth of 37.75 also exceed the GMA mandate of twenty years. Thus, the example city does not need to have its UGA boundary expanded and more importantly, the current UGA appears large enough to accommodate the next twenty plus years of growth.

9. Future Industrial Land Needs:

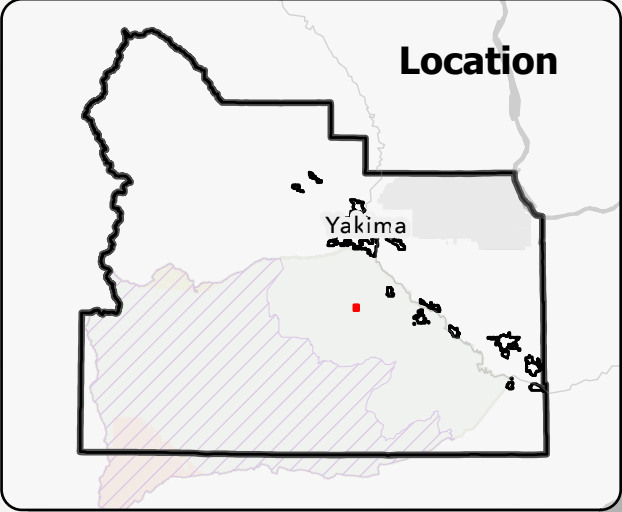
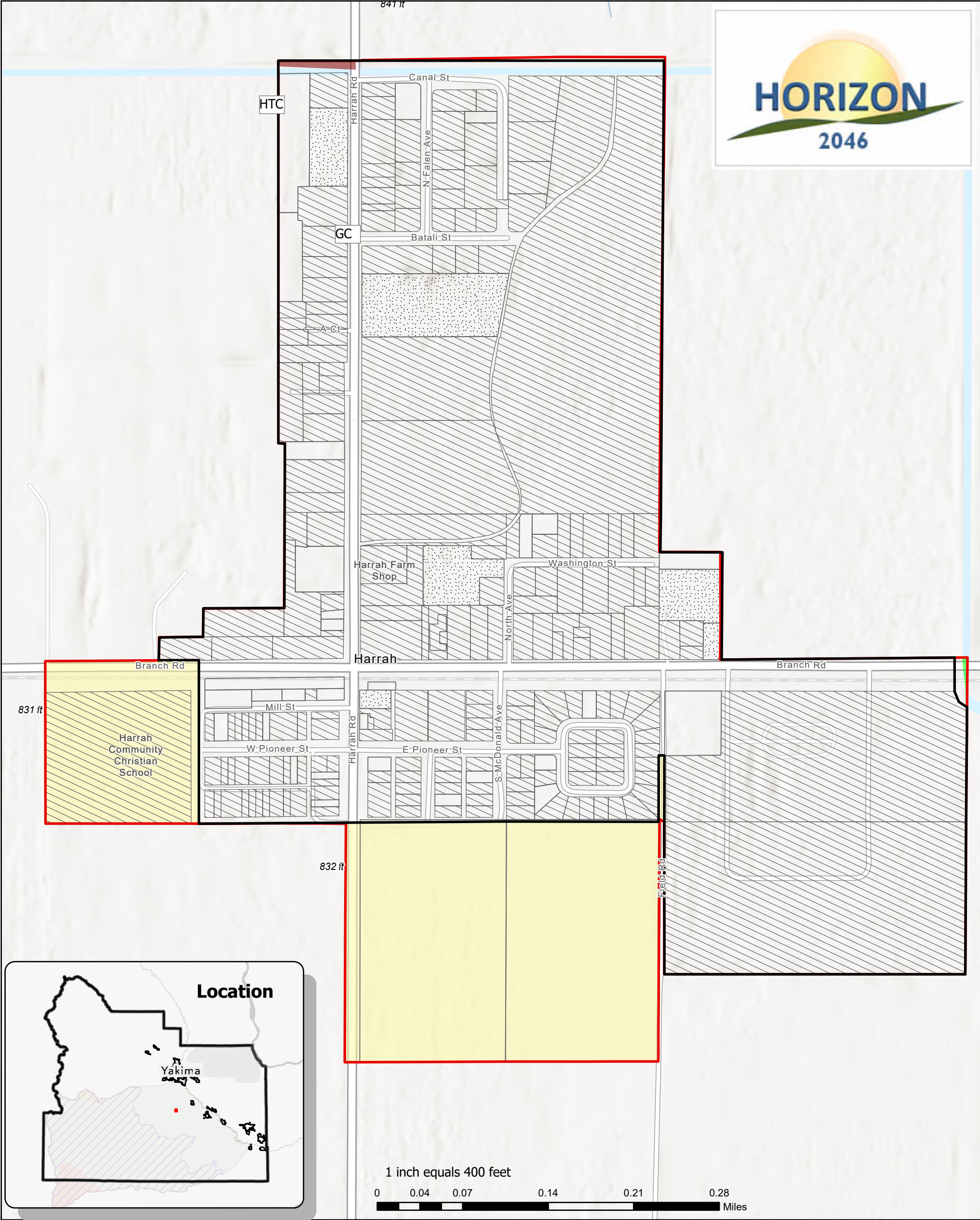
As provided by the analytical process outlined in the “Urban Lands” section in the Land Use Element of Yakima County’s Comprehensive Plan - **Horizon 2040** the amount of land needed for future industrial uses “is based on the city’s economic development strategy and is not contingent on future population.”

5.8.5.2 Countywide Urban Growth Area Land Capacity Analysis Results

The Growth Management Act (GMA) requires Yakima County to review the UGAs of each of the County’s fourteen cities and towns as part of the 2017 period comprehensive plan update. GMA requires this update once every eight years. In coordination with those cities and towns, the County conducted a Land Capacity Analysis (LCA) to determine the amount of urban lands needed for twenty years of growth. The land needed to accommodate that growth is broken down into four categories: Residential, Commercial/Retail, Community Facilities and Streets. The estimated amount of land needed to accommodate future growth is outlined in Table 5.8.5.2-1 below.

Table 5.8.5.2-1 Land Capacity Analysis (LCA) – Land Needed For Future Growth							
Yakima Cities	Projected Pop Increase From 2015-2040	Person Per Household (Census)	Number Households needed	Land Needed For Residential (Acres)	Land Needed For Commercial & Retail (Acres)	Land Needed For Community Facilities (Acres)	Land Needed For Streets (Acres)
Grandview	2,289	2.97	794	155	19	245	63
Granger	1,923	4.14	464	87	10	62	24
Harrah	123	3.53	35	7	1	4	2
Mabton	339	4.31	79	15	2	7	4
Moxee	3,870	3.26	1,187	233	18	74	49
Naches	254	2.51	101	20	13	30	9
Selah	2,410	2.64	913	178	29	115	48
Sunnyside	3,117	3.60	866	169	82	107	54
Tieton	451	3.33	135	26	3	3	5
Toppenish	990	3.33	297	58	14	21	14
Union Gap	1,001	2.90	345	67	43	32	21
Wapato	677	3.88	174	36	6	23	10
Yakima	17,167	2.68	6,406	1,250	297	271	273
Zillah	1,876	2.87	654	128	32	93	38

Source: Yakima County GIS – UGA Analysis 2015-2016



Staff Recommendation
Harrah UGA Current and Proposed Zoning

- Current City Limits

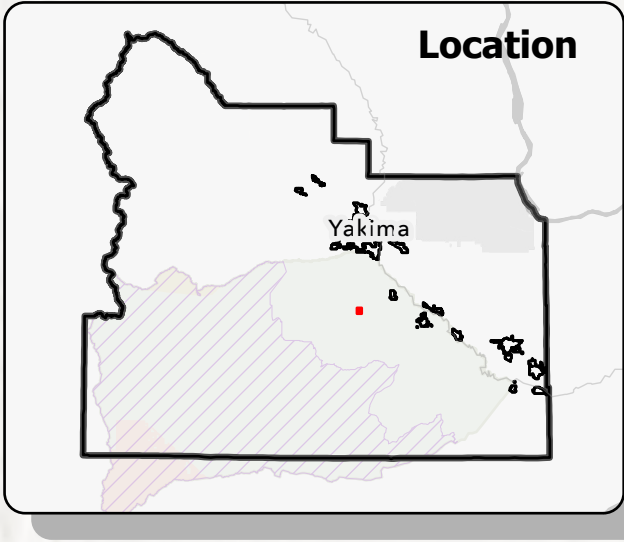
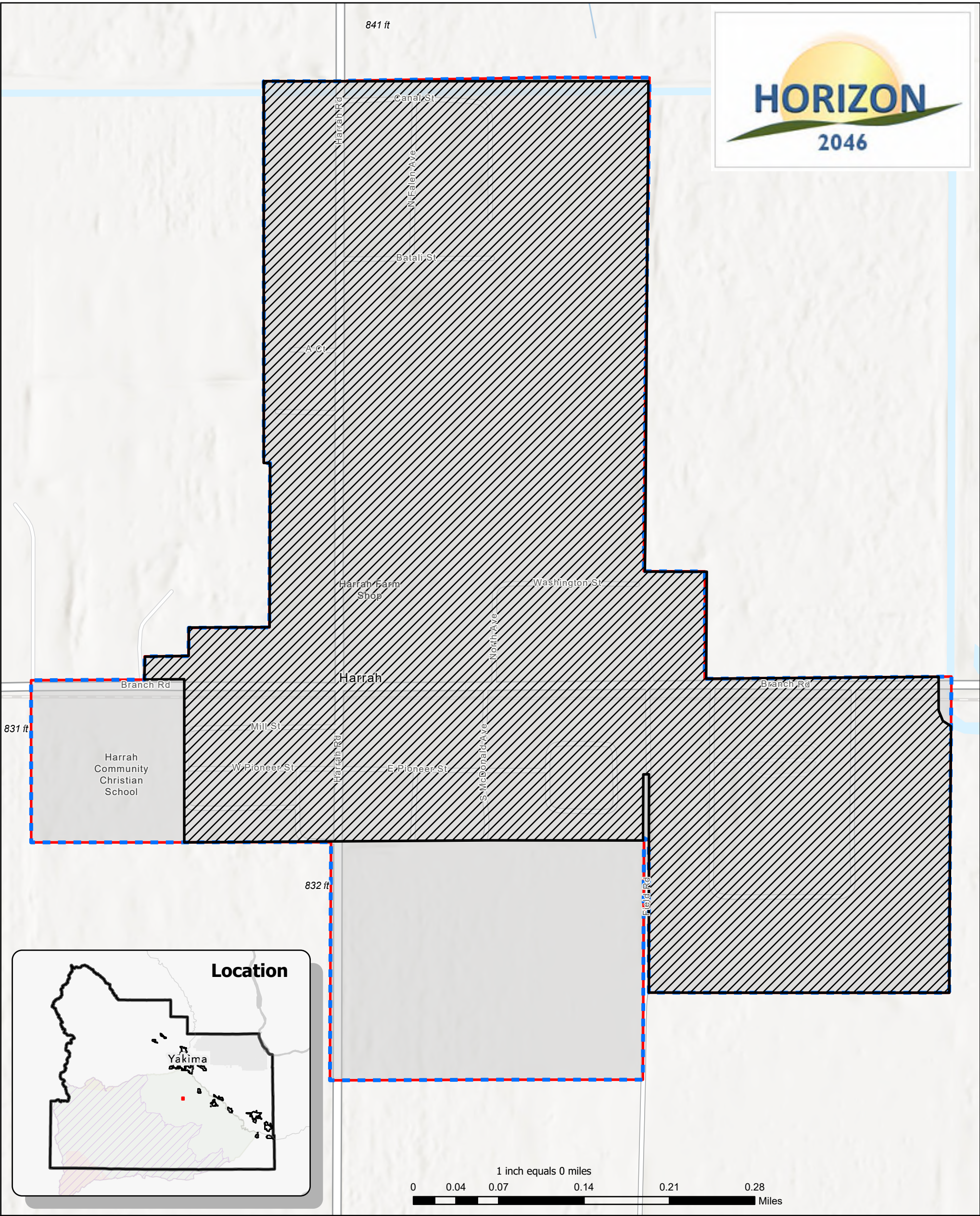
Current Urban Growth Boundary
- County Zoning**

(R-1) Single-Family Residential

- Potential Development**
- Developed
- Vacant
- Partially Developed



Date: 10/2/2025
Parcel Lot lines are for visual display only. Do not use for legal purposes.



Staff Recommendation
Harrah UGA Changes - No Change

- Current City Limits
- Proposed Urban Growth Boundary Change
- Current Urban Growth Boundary



Date: 10/2/2025
Parcel Lot lines are for visual display only. Do not use for legal purposes.