

SEP 25 2025

Union Gap UGA "Area One" Property Owners
Jacquelyn Wonner
Ken and Inez McAllister
Kerry and Gina Martin

Case No.: LRN2025-0001
Assigned To: Aaron

September 25, 2025

Mr. Aaron Cohen
Yakima County Planning Division
128 N. Second St., 4th Floor Courthouse
Yakima, WA 98901

Yakima County Planning Commission
128 N. Second St., Room 232
Yakima, WA 98901

Mr. Jason Cavanaugh
City of Union Gap, Community Development Department
102 W. Ahtanum Road
Union Gap, WA 98903

Mr. Albert Miller
Yakima Valley Conference of Governments
311 North 4th Street, Suite 204
Yakima, WA 98901

EXHIBIT NO. 4
DATE: 10/22/2025
FILE NO. LRN25-019

RE: Union Gap Urban Growth Area (UGA) Proposed Changes

Dear Mr. Cohen, Planning Commission members, Mr. Cavanaugh, and Mr. Miller:

This letter responds to the Yakima County Staff Report dated August 27, 2025 concerning possible changes to the City of Union Gap Urban Growth Area (UGA) affecting our properties, and to Mr. Cohen's August 19, 2025 letter to property owners. Unfortunately, we landowners were not contacted and included in discussions concerning our properties prior to finalization of the Staff Report, so we had no opportunity to reach agreement on Staff Report content prior to its release. Instead, we are left in the undesirable position of now being adversarial, in strong opposition to the Staff Report assumptions, conclusions, and recommendations concerning our properties.

Introduction to Area One

The Staff Report refers to our properties collectively as "Area One". Area One is 80.71 acres of Ahtanum foothill view property comprised of 8 parcels in size from 6.48 acres to 13.28 acres located inside the Union Gap UGA, served by well and septic systems, power, telecom, and a private road connected to Meadowbrook Drive. There are three owners. Wonner owns six parcels,

McAllister owns one parcel, and Martin owns one parcel. On the McAllister parcel, McAllister built their personal residence, with 4 potential homesites remaining. On the Martin parcel, there are 3 potential homesites, and a wireless internet access point used by Gigabeam Internet, LLC. On the Wonner parcels, there are 22 potential homesites. Area One is suitable and intended for subdivision into estate-size lots (2.5 acre minimum) for higher-end view homes, and is currently zoned Single-Family Residential (R-1). Assessed values for homes already built are \$810,400 (McAllister residence), and \$858,500 (Simon residence, abutting Wonner parcels, not within Area One). At the intended density of 1 dwelling unit per 2.5 acres (0.40 dwelling units per acre), there is one existing home and 29 potential homesites within Area One. A cluster subdivision approach is anticipated for some parcels.

Area One Zoning History and Development Plan

Prior to establishment of the Union Gap UGA and inclusion of Area One in the UGA, the Area One zoning was General Rural (GR) under previous Yakima County Ordinance 8-1974, Chapter 15.23. The GR zoning district was intended to protect and maintain the openness and rural character of outlying areas while allowing low density and cluster residential development. Lot size was determined by the amount of land required for an approved domestic water supply and sewage disposal system, per Yakima Health District standards. Any lot created had to be at least 0.50 acre in size, and the average size of the parcels created had to be at least 1 acre (1 dwelling unit per acre).

After establishment of the Union Gap UGA and inclusion of Area One in the UGA, the Area One zoning changed to One-Family Residential (R-1) under previous Yakima County Ordinance 1-2000, Chapter 15.33. At Chapter 15.33.030, when public water and public sewer services were not available, minimum lot size was 2.5 acres (0.40 dwelling units per acre). Cluster developments excepted. The 2.5 acre minimum land area provided for on-site septic systems under all six soil types, per WAC 246-272A-0320.

Although the current Single-Family Residential R-1 zoning (max. 7 dwelling units per acre) allows higher density than previous zoning, we never intended to develop our properties to the maximum currently allowed density and always had plans for development under prior (lower) zoning densities. The current highest R-1 density is not the vision and plan we have for the property, and well and septic systems are planned instead of extension of public water and public sewer services as they exist now. Our planned development density is 0.40 dwelling units per acre, at 2.5 acre minimum lot size.

Response to Staff Report

There are no conditions existing that by law require Area One to be excluded from the UGA. The Staff Report proposal to exclude Area One from the UGA is the Staff Report writer's initiative and creation, not a legal requirement nor otherwise necessary. The City of Union Gap UGA Staff Report unfortunately contains opinions, assumptions, conclusions, and recommendations concerning Area One that are objectionable and incorrect, and need to be revisited and corrected.

The following issues are presented in the order existing in the Staff Report, identified by Staff Report page (P) and line (L) number:

P4, L23: To be consistent with Land Capacity Analysis (LCA) results later in the report (Page 5, Line 22, and elsewhere), the surplus of residentially zoned vacant acres should be 174 (not 201).

P4, L32: The Land Capacity Analysis (LCA) assumes future residential growth at 5.1 dwelling units per acre of vacant land, or 8,500 s.f. of land needed per future household. Staff Report Attachment 1 (LCA) describes this assumption input as “Desired average density of future housing (2024-46)”. Other than “desired”, there is no explanation of how the 8,500 s.f. value was established.

Question: Is the 5.1 dwelling units per acre (8,500 s.f. per household) an actual value calculated from historical residential single-family and multi-family land development data from the area, or is it simply just what’s desired?

If it is just a desired value, then it appears that the Future Residential Land Need is being significantly underestimated. Of course, not every home to be constructed over the next 20 years will be on a small city-size 8,500 sf. lot, especially considering the suburban pastoral character of the west UGA where land is consumed in parcel sizes that buyers actually want, typically much larger than 8,500 sf per residence. Even when averaging-in multi-family developments, the average should not be that low.

We and others impacted by or relying on LCA conclusions would have a lot more confidence in the future residential growth input assumption and resulting Future Residential Land Need estimate if it was based on actual data. (For example, an analysis of actual data from new residential building permits in the subject geographic area from the past 20 years, resulting in a data set including the parcel size for each residential permit, the number of residences permitted, and calculated averages. The yearly average parcel size per residence values from that data would then calculate a more realistic Future Residential Land Need projection.)

P5, L8: The LCA assumes that 15% of residential development land will be used for streets and utilities, and so will not be contributory to building lot area. Compensating for this, the residential acreage needed is increased by 15%, increasing the acreage by 12 acres, from 82 to 94 acres ($82 \times 1.15 = 94.3$). The 15% value is the low side of the typical 15% - 30% range, and there is no explanation of how the LCA 15% value was established. The percent deduction for land not contributory to lots in a residential subdivision typically averages around 20% - 22% considering street dedications, land for storm drainage facilities, utility tracts, park /open-space tracts, and other common area tracts managed by the community HOA (e.g. entry monument/landscaping tract, etc.). The LCA 15% assumption for streets is too low, and so underestimates the Future Residential Land Need.

We and others impacted by or relying on LCA conclusions would have a lot more confidence in the future streets land need percent assumption and resulting Future Residential Land Need

estimate if it was based on actual data. (For example, an analysis of actual residential subdivisions in the area, resulting in a data set including the original parcel size and the total area of building lots after subdivision. Subtract the total area of building lots from the original parcel size, and the result is the total area for streets, utilities, open space, etc. The very accurate non-buildable area percentage derived from actual data would then calculate a more realistic Future Residential Land need projection.)

P5, L22: The Land Capacity Analysis (LCA) calculates a total future residential land need of 94 acres over 22 years (2024 – 2046). Not stated in the Staff Report, but that is an average of only 4.27 acres per year. Assuming residential development of only 4.27 acres per year over 22 years is obviously understating the future land need. Just one buyer of a vacant 5-acre parcel obtaining building permit for their one new home would exceed the LCA land need assumption for the whole year. Not everyone buying or developing acreage will be developing to the 5.1 dwelling units per acre (8,500 s.f. per household) density assumed in the LCA, especially in suburban areas west of Union Gap where there are a lot of acreage parcels, and where that close-in yet suburban area character is why people buy acreage there.

Question: How many acres of residential land within the Union Gap UGA was permitted for construction, both single-family and multi-family, in each of years 2020, 2021, 2022, 2023, 2024, and 2025 to date? How does that compare to the estimated 4.27 acres per year assumed to be needed?

P9, L14: Attachment 5 was not included in the Staff Report PDF file, so we do not know what it contains.

P10, L29: We strongly oppose the findings and proposal to remove Area One from the City of Union Gap's unincorporated UGA.

P10,L32: We strongly disagree with the Staff Report writer's opinion that Area One zoning should be drastically and catastrophically changed from Urban Residential (Single-Family Residential R-1) to Rural Remote Extremely Limited Development Potential (RR/ELDP) or Remote/Extremely Limited Development Potential (R/ELDP-40). Area One is neither remote nor extremely limited in development potential.

In the Yakima County code, the RR/ELDP and R/ELDP-40 zoning designations are grouped along with remote and undeveloped land uses such as Forest Watershed and Mining. This zoning is intended for properties with limited service availability and environmental constraints in remote areas or other places with extremely limited development potential. Some uses are allowed, but the primary purpose is to maintain a natural, undeveloped state. But Area One is a residential area within 8 minutes driving distance to downtown Union Gap.

Yakima County code states that under RR/ELDP or R/ELDP-40 zoning, minimum lot area is 40 acres, or less as the lesser lot size or higher density existed on May 21, 1997. It further states that after establishment of this zoning, landowners should not expect the county to change the zoning

to allow for greater density in the future as the designation is a key part of the county's long-term comprehensive plan. Accordingly, none of the Area One parcels could be further subdivided under this zoning. Obviously, this downzoning proposal, just one step from outright condemnation, is entirely inappropriate, unreasonable, and unacceptable.

P10, L35: We strongly disagree with the Staff Report's suppositions behind this outrageous proposed downzone. Area One topography does not condemn it to RR/ELDP or R/ELDP-40 zoning. There are homes built and planned to be built on similar foothill view-site topography all over Yakima Valley. The reference to "oversteepened slopes of high risk or intermediate risk" is terminology from Yakima County GIS mapping with display of geologic hazard colored overlays general to the area selected. Everyone knows those overlay designations are general to an area, not particularly accurate, nor property-specific, and there is no actual on-site measurement or testing that establishes overlay designations or boundaries. Yet the Staff Report is using that in thin support of the proposed zoning change and exclusion of Area One from the UGA.

Below are just a few examples of homes built on similar Ahtanum foothill view properties nearby Area One and designated with the same geologic hazard map overlays as Area One. Examples are limited to nearby Area One, but examples of homes like these with the same geologic hazard overlays can be found all over Yakima County.

Example Ahtanum foothill view homes to the East, in the UGA: (comparable topography and services)

(Same "Oversteepened Slopes High Risk" geologic hazard map overlay as Area One)

24 Eagle Crest Drive - 4,056 sf - \$789,500 AV - 5.99 ac - "Oversteepened Slopes High Risk"
26 Eagle Crest Drive - 4,289 sf - \$988,200 AV - 2.76 ac - "Oversteepened Slopes High Risk"
36 Eagle Crest Drive - 4,076 sf - \$666,900 AV - 0.52 ac - "Oversteepened Slopes High Risk"

Example Ahtanum foothill view homes to the West, not in UGA: (comparable topography and services) (Same Oversteepened Slopes Intermediate or High Risk geologic hazard map overlays as Area One)

861 Red Sky Drive - 2,598 sf - \$711,100 AV - 9.99 acres - "Intermediate Risk"
1041 Red Sky Drive - 4,548 sf - \$1,150,500 AV - 31.92 acres - Both High and Intermediate
303 View Point Drive - 2,958 sf - \$854,700 AV - 4.93 acres - "High Risk"
480 View Point Drive - 2,342 sf - \$708,300 AV - 5.05 acres - "Intermediate Risk"
3731 S. 40th Ave. - 2,610 sf - \$1,120,200 AV - 17.32 acres - "Intermediate Risk"

P10, L35: We agree that large-scale subdivision to the density allowed under the current Single-Family Residential (R-1) zoning district would be more complicated due to topography, but 7 dwelling units per acre is not the density we ever intended for the property. We intend to develop the property at a density of 0.40 dwelling units per acre (2.5 acres per dwelling unit), and that is not difficult due to topography.

P10, L37: Without knowing anything whatsoever about our actual very low-density development plans, the Staff Report apparently assumes that Area One will be developed to the highest R-1

density (7 dwelling units per acre), and accordingly, there will be substantial amounts of material (cut/fill) to be moved, and small city-sized building sites established in ways within slopes that will trigger substantial environmental reviews. The Staff Report further states that such environmental reviews would not be applicable to other nearby unspecified vacant residential land, as if that is somehow a factor.

Without knowing anything whatsoever about our actual plans, our land development experience, or financial capability, the Staff Report writers apparently think that development of Area One properties will be unreasonably burdensome for us compared to some other unknown nearby properties that we don't own, and because of that, a drastic downzone and exclusion of Area One from the UGA is justified. None of this is valid justification. While it is heartwarming to know that our government planning department is concerned about our well-being and is wanting to spare us perceived development difficulties by making our properties undevelopable, we don't want this government intervention.

P10, L40: We strongly disagree with the Staff Report's idea that the RR/ELDP and R/ELDP-40 designation and zoning is the best fit for Area One, and we will intensely oppose any continuing attempt to accomplish that downzoning.

P10, L42: The description of Remote Rural/Extremely Limited Development Potential areas in Purpose Statement LU-R 11 (Horizon 2040) does not describe or fit Area One. Area One is neither remote nor extremely limited in development potential. Area One already includes one home, and one abutting home similarly situated with the same topography, each with all necessary and appropriate utilities and services. The ability to provide on-site water and sewage disposal systems and other appropriate residential utilities and services to Area One and many other properties similarly situated has been proven already, and is not materially difficult.

Two fully serviced existing homes in and abutting Area One, in the UGA: (AV = Assessed Value)
911 Aerial Drive - 4,339 sf - \$810,400 AV - 12.74 acres (in Area One)
3520 S. 5th Avenue - 3,562 sf - \$858,500 AV - 11.76 acres (abutting Area One on the north)

P11, L29: We disagree with Staff Report findings. Area One is not environmentally constrained due topography and does factor in development potential.

P11, L33: We disagree with Staff Report findings. Area One already includes one home, and one abutting home similarly situated with the same topography, each with all necessary and appropriate utilities and services. The ability to provide on-site water and sewage disposal systems and other appropriate residential utilities and services to Area One properties has been proven already and is not materially difficult. Similarly elevated and contoured residential foothill properties with homes similarly serviced can be found all over the Yakima Valley. The Staff Report's invalid opinions should not be relied on as justification for downzoning and removal of Area One properties from the UGA.

P12, L19: While the Land Capacity Analysis results indicate that the UGA should not be expanded at this time, there is no legal requirement that the UGA must be reduced. The Staff Report writer only offers that it could be reduced. There is no legal requirement, necessity, or valid justification for downzoning and excluding Area One properties from the UGA.

P12, L23: We strongly disagree with the county planning staff recommendation to remove Area One from the City of Union Gap's UGA.

P12, L26: Attachment 5 was not included in the Staff Report PDF file, so we do not know what it contains.

UGA Staff Report Comparison - Vacant Residential Land Analysis

We compared all twelve Yakima County UGA staff reports available at this time to see how the Union Gap UGA staff report's treatment of surplus vacant residential land and conclusions and recommendations compare to other UGA staff reports. Two UGA staff reports, Granger and Mabton, were not available. Incredibly, we found that through all twelve UGA staff reports, our Area One properties are the only properties specifically targeted and recommended for downzoning and exclusion from any UGA.

Per staff report Land Capacity Analysis formula input assumptions, the Union Gap UGA has surplus vacant residential land projected to be developed over 41 years. Only two UGAs have surplus vacant residential land development time projections less than Union Gap. For the nine UGAs with surplus vacant residential land development time projections greater than Union Gap, the projections are between 84 years and 407 years. That's two to ten times more than Union Gap, but none of those other UGA staff reports are proposing a reduction in UGA size and removal/downzone of properties. Only the Union Gap UGA Staff Report is, and only our properties are targeted. See Attachment 1, Staff Report Analysis – Vacant Residential Land.

The Union Gap UGA Area Two property is also recommended for removal from the UGA, but it is Yakama Nation trust land, so not comparable.

Question: Why, out of all properties in all UGAs in all of Yakima County, were only our Area One properties singled-out for this special treatment? Who is driving this peculiar effort?

Proposal for Rural Residential (RR 2.5) Zoning or Equivalent

Because it appears that Yakima County no longer has a rural residential zoning district with a 2.5 acre minimum lots size or 0.40 dwelling units per acre maximum density, we ask that Yakima County, concurrent with the UGA review, move to establish a Rural Residential (RR 2.5) zoning district to properly address transitional rural residential land abutting the UGA boundary. The RR 2.5 district will fill the current huge gap in zoning between urban Single-Family Residential R-1 (7 dwelling units per acre) and Rural 10/5 or Rural Transitional 5-acre minimum (0.20 dwelling units per acre) densities.

Alternatively, the existing Rural Transitional district could be modified to 2.5 acre minimum lot size / maximum 0.40 dwelling units per acre, as well as subdivision and development ordinances as may be required in support of an improved Rural Transitional district.

Most Washington counties have this common 1.0 or 2.5 acre urban to rural transitional zoning, and Yakima County should have this also. See Attachment 2, Rural Residential Transitional Zoning less than Five Acres in Washington, showing that 70% of Washington counties have rural residential zoning providing for minimum lot sizes less than 5 acres outside the UGA.

Conclusion

The UGA boundary and zoning change that the Staff Report proposes for Area One is unnecessary and not legally required, and we strongly prefer that Area One remain within the UGA. However, we do not object to a change in UGA and zoning from urban to rural provided that minimum lot sizes, densities, and other zoning and development terms remain consistent with our long-held plans for the property and do not impair subdivision, development, and use of the property as intended. If Rural Residential 2.5 or equivalent zoning and development codes acceptable to Area One owners can be applied to Area One properties, then the proposed UGA boundary change and designation from urban to rural could be acceptable. Any zoning change must also preserve Martin's wireless access point as an allowed use.

However, any urban to rural downzoning proposing a minimum lot size greater than 2.5 acres, or a maximum density less than 0.40 dwelling units per acre, or disallowing cluster development at that density, is absolutely unacceptable. If Yakima County holds the position that rural residential land development resulting in densities of greater than one dwelling unit per 5 acres is not rural in character, does not protect rural character, and is actually urban in nature, then we strongly oppose the proposed UGA boundary change and exclusion of Area One from the UGA.

Unfortunately, we Area One landowners were not contacted and included in Union Gap UGA review discussions concerning our properties until after completion of the Staff Report, so we had no opportunity to participate and to reach agreement on Staff Report content prior to its release. We understand that these UGA review discussions have been going on for two years without us. For major land use actions like this, it is more efficient, productive, and respectful to communicate with potentially impacted landowners early in the process rather than leaving landowners the last to know with little time to respond.

We trust that after consideration of the information we've provided, you will revise the Union Gap UGA Staff Report opinions, findings, conclusions, and recommendations accordingly, and in subsequent actions will cease the unnecessary and extremely damaging downzoning and UGA exclusion proposed for our properties. Thank you.

Sincerely,

Owner of Area One parcels 181212-33405, 33407, 33408, 34402, 34403, 34405:

Jacquelyn Wonner by Richard Wonner (POA)
Jacquelyn Wonner, by Richard Wonner, power of attorney
8504 Hawthorn Drive, Yakima, WA 98908

Owner of Area One parcel 181212-33406:

Ken McAllister
Ken McAllister
Trustees of the Ken and Inez McAllister Revocable Trust
911 Aerial Drive, Yakima, WA 98903

Inez McAllister

Owner of Area One parcel 181212-34406:

Kerry Martin
Kerry Martin
PO Box 8093, Yakima, WA 98908

Shirley Martin

Attachment 12026 Yakima County Urban Growth Area Update - Staff Report Analysis - Vacant Residential LandVacant Residential Land Analysis

<u>Urban Growth Area and Staff Report Date:</u>	Grandview [8.27.25]	Granger [1]	Harrah [9.17.25]	Mabton [1]	Mowee [7.23.25]	Naches [7.23.25]	Selah [7.9.25]	Sunnyside [7.9.25]	Tieton [9.24.25]	Toppenish [8.13.25]
Population Change Over 22 Years (2024 - 2046)	2,858	33	4,256	607	2,404	3,175	1,155	339		
Average Household Size (2020 Community Survey)	3.33	3.08	3.83	2.06	2.44	3.62	4.24	3.66		
Future Households Added Over 22 Years	858	11	1,111	295	985	877	272	93		
Future Households Added per Year	39	1	51	13	45	40	12	4		
Vacant Residential Land Needed per Household (S.F.)	8,500	8,500	8,500	8,500	8,500	8,500	8,500	8,500		
Vacant Residential Land Needed, all Households (Acres)	167	2	217	58	192	171	53	18		
Land Needed for Streets & Non-building Tracts (15%) (Acres)	25	0	33	9	29	26	8	3		
Total Vacant Residential Land Needed (Acres)	192	2	250	67	221	197	61	21		
Total Vacant Residential Land Needed Per Year (Acres)	8.7	0.1	11.4	3.0	10.0	9.0	2.8	1.0		
Available Vacant Residential Land Inside City (Acres)	645	8	232	33	667	451	197	23		
Available Vacant Residential Land Outside City (Acres)	703	31	301	42	726	858	277	383		
Total Available Vacant Residential Land in UGA (Acres)	1,348	39	533	75	1,393	1,309	474	406		
Years to Develop Total Available Vacant Residential Land in UGA	154	429	47	25	139	146	171	425		
Surplus Vacant Residential Land in UGA (Acres)	1,156	37	283	8	1,172	1,112	413	385		
Surplus Vacant Residential Land Market Choice Factor (MCF %)	602%	1850%	113%	12%	530%	564%	677%	1833%		
Years to Develop Surplus Vacant Residential Land in UGA	132	407	25	3	117	124	149	403		
Staff Report Conclusions and Recommendations:										
Changes to Yakima County Comprehensive Plan Designations	Yes	No Change	No Change	No Change	No Change	No Change	Yes	No Change		
Changes to Yakima County Comprehensive Plan Zoning	Upzone	No Change	No Change	No Change	No Change	No Change	Upzone	No Change	D	
Changes to Urban Growth Area Boundaries	No Change	No Change	No Change	No Change	No Change	No Change	Expanded	No Change		
Land Added or Removed from the Urban Growth Area	No Change	No Change	No Change	No Change	No Change	No Change	Added	No Change		

Rural Residential Transitional Zoning less than Five Acres in Washington

EASTERN WASHINGTON (20 Counties)

Eastern Washington counties with rural residential zoning less than 5 acres:
Fourteen of twenty (14 of 20) counties (70%)

Adams County – Rural Residential (RR)

Minimum Lot Size – 1.25 acres / Maximum Density - 0.80 dwelling units per acre

Purpose: The RR designation will be applied to lands that are somewhat removed from established communities within the county, but not in areas that are considered appropriate for commercial farming activities, having the following characteristics: (1) public water may be available; however, public sewer systems are not usually available; (2) near existing established neighborhoods where primary use is residential; (3) not in areas where the predominant uses are prime agricultural production; and (4) response times for emergency services are not as low as in the residential areas. The types of activities allowed may include single-family residences, home occupations, agricultural activities including some agri-tourism uses and the keeping of livestock (“hobby farms”).

<https://www.codepublishing.com/WA/AdamsCounty/#!/AdamsCounty17/AdamsCounty1728.html>

Asotin County – Agricultural/Transition (A-T)

Minimum Lot Size – 1 acre / Maximum Density - 1 dwelling unit per acre

Purpose: This district is intended to accommodate the existing land uses that are predominately agricultural while recognizing that the zone is likely to transition into a low-density residential area that will be provided with typical urban services and infrastructure.

<https://www.asotincountywa.gov/DocumentCenter/View/110/Zoning-Ordinance-PDF>

Benton County – Rural Lands One Acre (RL-1)

Minimum Lot Size – 1 acre / Maximum Density - 1 dwelling unit per acre

(Provided, the Benton-Franklin Health District may require a larger parcel size as necessary to meet on-site sanitary well and sewer provisions.)

Purpose: The Rural Lands One Acre District (RL-1) provides for the appropriate development within areas where past actions have created smaller parcel sizes than generally allowed in the Rural Lands Five Acre District (RL-5) or that are adjacent to Urban Growth Areas (UGAs) given that these areas are considered limited areas of more intensive rural development as allowed under RCW 36.70A.070.

<https://bentoncountywa.municipalone.com//files/documents/CH1109BCC148043447062419PM.pdf>

Chelan County – Rural Residential 2.5 (RR2.5)

Minimum Lot Size – 2.5 acres / Maximum Density - 0.40 dwelling units per acre

Purpose: The RR2.5 zoning district maintains the range of rural development opportunities consistent with the rural character and rural development provisions outlined in the goals and policies of the comprehensive plan. These areas can provide buffering or transitions between

existing rural developments and areas of higher or lower densities. This designation should not function as an urban reserve area, although these areas may someday be incorporated into an urban growth area.

<https://www.codepublishing.com/WA/ChelanCounty/html/Chelco11/Chelco1114.html#11.14>

Columbia County

(Minimum 5 acres outside the UGA, unless PUD)

Douglas County – Rural Resource (RR-2)

Minimum Lot Size – 2 acres / Maximum Density – 0.50 dwelling units per acre

(Density may be increased by fifty percent (50%) for cluster subdivisions.)

Purpose: The RR-2 rural resource district provides an area for low density, rural residential lifestyles that require only rural levels of service for utilities and infrastructure. This district may accommodate some agricultural activities, however the more intensive agricultural support activities, such as large-scale warehousing and/or processing or packaging facilities would not be allowed due to the potential for inclusion into an urban growth area at a future date. Clustering of residential lots will be permitted. If encompassed in the future within an urban growth area, the lands in reserve parcels may be available for further development depending on the nature of the open space designations, critical areas and other similar factors. Typically, domestic water will be obtained through individual wells and sewage disposal will be on-site, but occasionally public water supplies may be available.

<https://www.codepublishing.com/WA/DouglasCounty/html/DouglasCounty18/DouglasCounty1828.html#18.28>

Ferry County – Rural Service Area (RSA)

Minimum Lot Size – 2.5 acres / Maximum Density - 0.40 dwelling units per acre

(Minimum 2.5 acres for a lot to be served by individual water supply and individual sewer system.)

(Minimum 1.0 acre for a lot to be served by community water and individual sewer system.)

Rural Areas – Lands outside of the small towns, cross road commercial, and shoreline areas shall be rural with an overall land use density of one unit per 2.5 acres for any residential development.

<https://cms5.revize.com/revize/ferry/Document%20Center/Department/Planning%20&%20Building/Planning%20application/%20Ordinances/Development%20Regulations%20Ordinance%202024-02%20with%20links.pdf>

<https://cms5.revize.com/revize/ferry/Document%20Center/Department/Planning%20&%20Building/Planning%20application/Plans.%20Policies%20and%20Programs/ComprehensivePlanUpdatedWithMaps2016.pdf>

Franklin County – Rural Residential (RR-1)

Minimum Lot Size –1 acre / Maximum Density - 1 dwelling unit per acre

A. The rural residential 1 zone serves as a residential transitional area between the suburban areas surrounding cities and towns and the agricultural districts. Specifically, the rural residential 1 applies to the Clark Addition and Kau Trail areas and is intended to:

1. Provide an opportunity for rural residential living in areas close enough to cities and towns to permit commuting to work and in a manner that will not conflict with active agricultural production;

2. Provide a buffer area between urban and suburban areas and those areas reserved for continued agricultural production, to lessen potential conflicts between development and agriculture;

3. Provide a transitional area into which future suburban development can expand as and/or if needed;
4. Provide areas for a continued mixture of low-density residential development and hobby farming activities;
5. Provide a mechanism to in-fill existing development patterns in the Clark Addition and Kau Trail transitional areas;
6. Contain low-density development within those outlying areas already substantially committed to this use.

B. The rural residential 1 zone is characterized by a mixture of land uses encompassing small-scale commercial agriculture, part-time hobby farms, and scattered low-density commuter-residential development. Development in this zone should be primarily self-supporting and of a low density so as to not cause pollution problems which would force extensions of public water and sewer facilities.

https://library.municode.com/wa/franklin_county/codes/code?nodeId=TIT17ZO_CH17.14RUREZO

Garfield County – Agricultural Transition

Minimum Lot Size – 2 acre / Maximum Density - 0.50 dwelling unit per acre (with on-site sanitation)

Purpose: This zone is intended to accommodate the existing land uses which are predominately agricultural and low-density residential. As change and growth occurs, new land uses within this zone are intended to be compatible with the surrounding types

<https://www.garfieldcountywa.gov/media/5741>

Grant County

Rural Urban Reserve (RUR) - (Minimum 5 acres)

Kittitas County – Rural 3 (R-3)

Minimum Lot Size – 3 acre / Maximum Density - 3 dwelling units per acre

The purpose and intent of the Rural-3 zone is to provide areas where residential development may occur on a low-density basis. A primary goal and intent in siting R-3 zones will be to minimize adverse effects on adjacent natural resource lands.

<https://www.co.kittitas.wa.us/boc/countycode/title17.aspx>

Klickitat County – Rural Residential (RR1 and RR2)

RR1 - Minimum Lot Size – 1 acres / Maximum Density - 1 dwelling unit per acre

RR2 - Minimum Lot Size – 2 acres / Maximum Density - 0.50 dwelling units per acre

The purpose of the rural residential zone is to maintain openness and the rural character of the countryside, to protect the county's water and other natural resources, and to provide areas which are appropriate for typical rural development of all kinds.

https://library.municode.com/wa/klickitat_county/codes/code_of_ordinances?nodeId=TIT19ZO_CH19.20_RRUREZO

Lincoln County – Residential (Res)

Minimum Lot Size and Maximum Density – As required by Health Dept. for water and sewer systems.

(The area of each building site shall be no less than the minimum area required by the Lincoln County environmental health department to safely accommodate approved water supply and sewage disposal systems.)

The purpose and intent of the residential district is to establish areas for residential dwellings adjacent to unincorporated and incorporated communities of the county. The intent is the preservation of a rural agriculturally oriented life style including the keeping of animals for pleasure and profit, retaining low to medium density development, and providing for a mixture of residential uses and necessary structures

<https://www.lincolncountywa.com/DocumentCenter/View/422>Title-17-Zoning-PDF?bidId=>

Okanogan County – Rural 1 (R1)

Minimum Lot Size – 1 acres / Maximum Density - 1 dwelling unit per acre (If private or public well with 100 ft SCA covenant)

Minimum Lot Size – 2 acres / Maximum Density - 0.50 dwelling units per acre (If public well without 100 ft SCA covenant)

The purpose of the Rural 1 district is to provide a wide range of rural/high-density compatible development options and be consistent with Okanogan County's comprehensive plan.

<https://www.codepublishing.com/WA/OkanoganCounty#!/OkanoganCounty17/OkanoganCounty1740.html#17.40>

Pend Oreille County

Rural Residential - (5 acre minimum)

Spokane County

Rural 5 - (5 acre minimum)

Stevens County

Rural Area 5 - (5 acre minimum)

Walla Walla County – Rural Residential 2 (RR-2)

Minimum Lot Size – 2 acres / Maximum Density - 0.50 dwelling units per acre

The purpose of this district is to provide a transition or a buffer between existing rural developments and areas of higher densities and higher or lower densities. Land in this district typically is too far from an urban area to enable cost-effective provision of public services at this time. Typical uses include small-scale farms, dispersed single-family homes, recreation, and other uses that do not require urban services.

https://library.municode.com/wa/walla_walla_county/codes/code_of_ordinances?nodeId=TIT17ZO_CH17.18DESTENDI

Whitman County – Agricultural / Rural Residential

Minimum Lot Size and Maximum Density - Per Health Department for water/sewer systems.

(The area of the subject lot shall be no less than the minimum area required by the Whitman County Department of Environmental Health to safely accommodate approved water supply and on-site sewage disposal systems.)

Purpose: The Agricultural District provides minimum standards for areas of general agricultural land use including requirements for single-family dwellings and accessory dwelling units. It is

intended that agriculture be the primary use in this district and that the goals of the County Comprehensive Plan be pursued where reasonably possible.

https://library.municode.com/wa/whitman_county/codes/code_of_ordinances?nodeId=TIT19ZOCO_CH1_9.10AGDI

Yakima County

No apparent option less than 5 acres minimum, from online resources.

WESTERN WASHINGTON (19 counties)

Western Washington counties with rural residential zoning less than 5 acres:

Thirteen of nineteen (13 of 19) counties (68%)

Clallam County – Rural (R1), Rural Moderate (R2)

R1: Minimum Lot Size – 1 acre / Maximum Density - 1 dwelling unit per acre (1.0 per acre)

R2: Minimum Lot Size – 1 acre / Maximum Density - 1 dwelling unit per 2.43 acres (0.4167 per acre)

The purpose of the Rural (R1) zone is to provide areas having a suburban/rural density setting free from commercial and industrial developments.

The purpose of the Rural Moderate (R2) zone is to provide areas having a moderate density rural setting free from commercial, industrial, and high-density residential developments.

<https://clallam.county.codes/CCC/33.10.025>

Clark County – Rural Center Residential Districts (RC-1, RC-2.5)

RC-1: Minimum Lot Size – 1 acre / Maximum Density - 1 dwelling unit per acre

RC-2.5: Minimum Lot Size – 2.5 acres / Maximum Density - 0.40 dwelling units per acre

Purpose: The rural center residential zones are to provide lands for residential living in the rural centers at densities consistent with the comprehensive plan. These districts are only permitted in the designated rural centers. Natural resource activities such as farming and forestry are allowed to occur as small-scale activities in conjunction with the residential uses in the area. These areas are subject to normal and accepted forestry and farming practices.

<https://www.codepublishing.com/WA/ClarkCounty/cgi/NewSmartCompile.pl?path=html/ClarkCounty40/ClarkCounty40210/ClarkCounty40210.html>

Cowlitz County – Rural Residential (RR-1, RR-2)

RR-1: Minimum Lot Size – 1 acres / Maximum Density - 1 dwelling units per acre

RR-2: Minimum Lot Size – 2 acres / Maximum Density - 0.50 dwelling units per acre

Purpose: Rural Residential areas are characterized by low density residential uses compatible with natural land potential, small-scale commercial and industrial uses, tourism opportunities, community facilities, along with timber management and agriculture. Public water and sewer service are generally not available. Privately owned community water services may exist. Fire protection is available. Rural areas are served primarily by lower classification public roadways and private roads.

<https://www.codepublishing.com/WA/CowlitzCounty/html/CowlitzCounty18/CowlitzCounty1810.html#18.10.150>

Grays Harbor County – Rural Residential (RR)

Minimum Lot Size – 1 acre / Maximum Density - 1 dwelling unit per acre

(Or larger as required per Health Dept. for water and sewer systems)

Purpose: The rural residential district is a zone classification permitting rural residential uses in areas suited for such development at densities consistent with the level of available public facilities, public services and land capability. Provisions are included to protect the rural residential uses from objectionable influences.

https://library.municode.com/wa/grays_harbor_county/codes/code_of_ordinances?nodeId=TIT17ZO_CH17.40RRRURED1

Island County – Rural Residential (RR)

Minimum Lot Size – 0.33 to 2.5 acres / Maximum Density – 0.40 to 3 dwelling units per acre

The purpose of the Rural Residential Zone is to define the logical outer boundary of a pattern of development and density that is more intensive than the density permitted in the Rural (R) Zone.

https://library.municode.com/wa/island_county/codes/code_of_ordinances?nodeId=TITXVIIIZO_CH17.03ISCOZOCO_17.03.070RURERRZO

Jefferson

Rural Residential - (5 acre minimum)

King County

Rural Area (RA-2.5) - (Maximum 1 dwelling unit per 5 acres)

Kitsap County

Rural Residential (RR) - (5 acre minimum)

Lewis County – Rural Residential Center (RRC)

RRC-R1: Minimum Lot Size – 1 acre / Maximum Density - 1 dwelling units per acre

RRC-R2: Minimum Lot Size – 2 acres / Maximum Density - 0.50 dwelling units per acre

Purpose: Rural residential centers are areas in rural Lewis County which historically had development and facilities at densities and intensities greater than rural development, but outside of urban growth areas and authorized in accordance with RCW 36.70A.070(5)(d)(i). The zones are necessarily limited to areas of existing development or development impact and defined by logical boundaries and service areas.

<https://www.codepublishing.com/WA/LewisCounty/html/LewisCounty17/LewisCounty1795.html#17.95.050>

Mason County – Rural Residential 2.5 (RR 2.5)

Minimum Lot Size – 2 acres / Maximum Density - 0.40 dwelling units per acre (1 DU per 2.5 acres)

Purpose: Rural residential districts primarily provide for low density residential use, but also provide for some rural uses such as hobby farms.

https://library.municode.com/wa/mason_county/codes/code_of_ordinances?nodeId=TIT17ZO_CH17.02DEARDE

Pacific County – Rural Residential (R-R)

Minimum Lot Size – 1 acre / Maximum Density - 1 dwelling units per acre

Purpose: The Rural Residential District is established to promote and protect low-density residential neighborhoods that exist in harmony with the natural environment. It is the intent of the District to promote a rural residential lifestyle by protecting environmental values, limiting population density to one dwelling unit per acre, permitting a variety of housing choices including both mobile/manufactured housing and stick-built /site-built housing, and permitting a variety of accessory activities, including limited recreational vehicle use and personal agricultural usage. These areas are typically served by on-site sewage disposal systems and individual domestic wells.

<https://www.co.pacific.wa.us/ordres/Ord-194-Final-Zoning.pdf>

Pierce County – Rural Separator (RSep)

Minimum Lot Size – 2.5 acres / Maximum Density - 0.40 dwelling units per acre

Purpose: The Rural Separator (RSep) zone classification includes rural lands intended as a buffer or separation between urban zone classifications. Rural Residential areas function as a buffer between urbanized areas and resource land. They can supply lands that may be added to an urban growth area over time. The Rural Residential zones also allow for commercial and industrial uses related to and dependent upon natural resources and public and commercial recreational and associated uses related to the outdoors, along with rural residential, agricultural, and other resource uses.

<https://pierce.county.codes/PCC/18A.10.090>

San Juan County

Information undeterminable from online resources.

Skagit County - Rural Intermediate (RI)

Minimum Lot Size – 2.5 acres / Maximum Density – 0.40 dwelling units per acre

The purpose of the Rural Intermediate district is to provide and protect land for residential living in a rural atmosphere, taking priority over, but not precluding, limited nonresidential uses appropriate to the density and character of this designation. Long-term open space retention and critical area protection are encouraged.

https://www.skagitcounty.net/PlanningAndPermit/Documents/Code/title14/Ch14_16.pdf

Skamania County – Residential 1 (R-1) or Residential 2 (R-2) in Rural 1 or Rural 2 areas

Minimum Lot Size – 2 acres / Maximum Density - 0.50 dwelling units per acre

(with individual wells and individual sewage disposal systems)

The R-1 zone classification is intended to encourage population concentration in areas where public or private services, utilities, and access can be provided with a minimum burden to community resources in the Rural 1 land use area of the county comprehensive plan A.

The R-2 zone classification is intended to provide a transition zone of medium density residential development which will maintain a rural character of the areas in the Rural 1 and Rural 2 land use areas of the county comprehensive plan A.

<https://ecode360.com/46467168>

Snohomish County

Rural zones - (5 acre minimum)

Thurston County – Residential LAMIRD (RL 1/1, RL 1/2)

RL 1/1: Minimum Lot Size – 1 acres / Maximum Density - dwelling units per acre

RL 1/2: Minimum Lot Size – 2 acres / Maximum Density - dwelling units per acre

The purposes of this district are to:

1. Establish a district that contains limited areas of more intensive rural residential development, consistent with RCW 36.70A.070(5)(d), that existed as of July 1, 1990 at a density of approximately one dwelling unit per acre (RL 1/1), or one dwelling unit per two acres (RL 1/2).

2. Provide for infill residential development at a maximum density of one dwelling unit per acre (RL 1/1) or one dwelling unit per two acres (RL 1/2), consistent with the development pattern established before July 1, 1990.

3. Provide development standards to assure that infill residential development is consistent with surrounding uses and can be accommodated without new urban level services.

https://library.municode.com/wa/thurston_county/codes/code_of_ordinances?nodeId=TIT20ZO

Wahkiakum County - Rural Residential (RR)

Minimum Lot Size – 1 acre / Maximum Density – 1 dwelling unit per acre (if well and septic on the property), or otherwise as per Health Department requirements.

(The density for rural residential areas shall be determined by size necessary to provide sewerage and water as per Health Department standards.)

Purpose: The Rural Residential classification is primarily for small lot, single-family units (1 to 5 acres) located adjacent to active agricultural and/or forestry management areas. Most rural residential lots average 2.5 acres and can support domestic stock. Rural Residential areas generally do not require facilities such as water or sewer lines. Roads are generally typical country roads which are gravel base with oil cap. The basic requirements of these areas are the availability of electric power, telephone service, well water, on-site sewage disposal and roadway access.

<https://www.co.wahkiakum.wa.us/DocumentCenter/View/2935/Comp-Plan-1984> (page 78)

<https://www.co.wahkiakum.wa.us/FAQ.aspx>

Whatcom County

Rural Residential - (Minimum 5 acres if no public water service available)