

Exhibit 5 – Staff Response to Area One Property Owner Letter

Relevant Reports:

- Yakima County 2046 Population Projections and Allocations – 2024 draft
- Yakima County 2046 Population Projections and Allocations – 2025 final report
- Office of Financial Management 2022 Population Projection Methodology Materials: <https://ofm.wa.gov/washington-data-research/population-demographics/population-forecasts-and-projections/growth-management-act-county-projections/growth-management-act-population-projections-counties-2020-2050>
- Department of Commerce, Growth Management Services, 2012 UGA Guidebook
- Department of Commerce, Growth Management Services, 2025 draft UGA Guidebook

Staff responses are in blue and italicized font below:

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).

Staff Response: The LCA has been updated to reflect the correct numbers as of the October 22, 2025, staff report. Inconsistencies were located as final population numbers in Table 8 of Yakima County 2046 Population Projections and Allocations were not correctly carried over in the analysis. The correct number is 147 acres based on the population numbers from Table 8.

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.)

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DATE: 10/24/2025
FILE NO. LRN25-019

Exhibit 5 - Staff Response to Area One Property Owner Letter 1

Staff Response: The LCA methodology is established within the Land-Use Element (Chapter 5) of Horizon 2040. The level density used is intended to factor in the growth across all fourteen cities in Yakima County. Staff are required to follow the methodology within Horizon 2040. The methodology does not provide for any variation between different zoning district standards. A more appropriate way to calculate floodplains was conducted due to staff's ability to justify such a calculation, and to properly account for residential development in the floodplain. To make changes to the LCA methodology based on recent developments (within Yakima County), more specific calculations from residential zoning districts, underutilized v. partially developed lots, and market choice factors, a robust quantitative and qualitative analysis and examination are required. Those changes may or may not benefit the property owners of Area One. Staff appreciates the comments regarding potential changes to the LCA methodology, as they provide critical analytical feedback. Changing the LCA methodology requires a comprehensive plan text amendment, which requires final approval by the Yakima County Board of County Commissioners.

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.)

Staff Response: See response to P4, L32 above.

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?

Staff Response: Based on the final numbers, the total future residential land needed is 121 acres. The result implies 5.5 acres of residential land is required per year. The calculations arriving at the 121 acres are methodical ones. Staff starts with the current population for the City of Union Gap, which, in this case, is based on 2024 Office of Financial Management Population Estimates (6,660). The draft population projections for Union Gap were based on a .78% compounded growth percentage. The .78% comes from the Annual Average Growth Rate (AAGR) from 2010 to 2022 for the City of Union Gap. Yakima County adopted the AAGR as the proper growth rate to calculate for the LCAs as the R-value was closer to 1 than the Office of Financial Management's 2022 Medium Projections for Yakima County. Yakima County is required under RCW36.70A.115 to select a growth rate between the Office of Financial Management's high and low thresholds. The complete methodology for 2046 population projections can be found in Yakima County 2046 Population Projections and Allocations.

In discussions with the City of Union Gap, the planner at the time determined that an increase to 1% to calculate population growth of Union Gap is more representative of recent growth trends and development of the city. The 2024 population number was calculated out to 2046, yielding a final number of 8,290 people expected to be in the City of Union Gap by 2046. The difference between the 2024 and 2046 numbers is used to determine the expected number of households needed for that growth. Based on a 3.03 average household population (taken from the 5-Year American Community Survey Estimates), 538 homes are needed. To provide for those 538 homes, the average lot size is calculated at 8,500 square feet and divided by 43,560 square feet (one acre). The final number is multiplied by 15% to account for roads, infrastructure, and open space, yielding the 121 acres needed. If developed the same every year, 5.5 vacant acres are all that is needed to accommodate the expected population growth for the City of Union Gap within the next planning period. All LCAs are a point-in-time review, which is why the ability to modify UGAs is given every five years by Yakima County code. Some years will also see more than average growth, while other years will be less than average. One purpose of the LCA is to determine if there is enough available land to accommodate the expected growth for the planning period. If there is more than enough available land, that would yield a surplus in the analysis. The analysis shows that within the UGA of the City of Union Gap, there is sufficient vacant acreage to meet the expected population growth for the subsequent 22-year planning period.

The Office of Financial Management conducts different methods to establish population growth numbers. These processes include the component method, ratio correlation, and the housing unit method. These methods incorporate the type and number of building permits issued, school enrollments, births, deaths, housing vacancy rates, etc. For a complete review, please see the Office of Financial Management's website link at the top of this exhibit. A public disclosure request submittal to both the County and the City of Union Gap is the proper channel for the requested information.

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

Staff Response: Attachment 5 was inappropriately referenced. The attachments to be found in Attachment 5 were located in Attachment 4 of the August 27, 2025, staff report. The relevant attachments in the October 22, 2025, staff report are 5, 7, and 8.

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

Staff Response: Staff appreciates the comments and their submittal.

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 R1) 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.

Staff Response: Staff heard similar concerns during the August 27, 2025 special meeting of the Planning Commission and altered the recommendation to place Area One within the Rural -10/5 Zoning District and Rural Self-Sufficient Designation.

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 - - 2.76 ac - "Oversteepened Slopes High Risk"

36 Eagle Crest Drive \$988,200 AV - 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" 4

80 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"

Staff Response: Staff noted these concerns during the August 27, 2025, special meeting of the Planning Commission. Staff does not imply that the properties in Area One are not developable at all, but rather analyzes their suitability for urban-level subdivisions and developments. All development applications submitted for a property in Area One are held to all applicable Yakima County codes.

P10, L35: We agree that large-scale subdivision to the density allowed under the current SingleFamily 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.

Staff Response: On the face, the first part of this statement is in line with staff's overall analysis that Area One is unsuitable for urban-level densities. For a complete analysis, refer to the Major Rezone and Plan Amendment Review Criteria in the staff report.

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.

Staff Response: Quantitative aspects of the LCA are feasible when applied similarly to all properties involved. The development desires for any property owner in a UGAs can easily change over time. Additionally, as properties are inherited or sold, the desires of new property owners may not align with the previous owners. Those are some reasons that residential development calculations must treat all properties similarly, to ensure consistency across the analysis. As the Area One properties contained topography, making full R-1 Development difficult, staff applied the environmental constrained zone group to the area as opposed to factoring in a lower density due to the slopes. The same application of the environmentally constrained zone group occurred for all fourteen municipalities in Yakima County. A robust analysis is required to legitimize a zone group that accommodates the variety of critical areas in Yakima County (creeks, streams, wetlands, slopes, alluvial fans, etc). Residential lots greater than 1.20 acres are placed within the partially developed category to document that an acre most likely will be kept for the remaining house and the rest subdivided off. Staff appreciates the comments above, which highlight a need to utilize other analytical methods for LCAs allowed under the GMA to accommodate various development factors. For example, counties can utilize a development category called underutilized to capture additional capacity on lots and within buildings. Those other analytical methods, though, will be appropriately applied to all qualifying properties. As all but one property within Area One is without a residence, the vacant development category is the only suitable classification, which will assume full development based on the current methodology.

RCW36.70A.110(3) outlines how to prioritize areas to be within an UGA, focusing on areas with existing urban character/density, areas where extensions of urban governmental services are logical and financially feasible. Staff does note that "nearby properties" were not specified. The vacant or partially developed properties (Parcels 181212-42004, 181212-41405, and 181212-41406) are logically situated to be within Union Gap's UGA. The GMA requires "counties and cities [to] plan UGAs to accommodate projected growth over a 20-year period, providing capacity for future population, housing, and employment and all the capital facilities, utilities, transportation, and open spaces needed to support that growth."¹ City of Union Gap utilities are located closer to those parcels. A development to the west of the area contains ¼ acre average lots and a development to the east contains ½ acre average lots, both are prime candidates for utility extensions and classified for urban development. Based on a compounded growth rate of 1% those parcels referenced above are more likely to be developed within the planning period for this LCA review than Area One. This is supported by the residential acreage need discussed in P5,L22. Lastly, if the Union Gap UGA was pulled back closer to city limits, placing those areas in the Rural Transitional Designation is appropriate, as they are likely the next locations for urban development and growth.

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.

¹ Department of Commerce, Draft UGA Guidebook, page 6

Staff Response: Staff noted these concerns during the August 27, 2025 special meeting of the Planning Commission and altered the recommendation to place Area One within the Rural -10/5 Zoning District and Rural Self-Sufficient Designation.

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)

Staff Response: A central aim of the staff report is to analyze Area One's suitability for urban-level development. Staff cannot account for property values in a staff report.

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

Staff Response: The P11,L29 contradicts the statement given in P10,L35 by the Area One Property Owners, "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." Area One is denoted as being within the geological hazard of oversteepened slopes of high and intermediate risk. Based on that information, an environmental site visit is required before submitting a formal land-use/environmental application to determine if a critical area ordinance (CAO) permit and/or what geotechnical/mitigation reports are needed (YCC16C.03.02). If a CAO permit/geotechnical report is not required, that does not preclude the Building and Fire Safety Division from requiring a geotechnical report before construction based on their applicable regulations.

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.

Staff Response: Numerous homes on hills within Yakima County are serviced by wells and septic systems. On-site wells and septic systems are not appropriate for urban-level growth and are not seen as urban governmental services (RCW36.70A.030(47)). Staff does not contend that servicing properties with wells and septic systems is infeasible, but that for properties within the UGAs, urban governmental services are the proper methods of providing water and sewer to new developments. The expansion of the urban governmental services should focus on urban centers and areas suitable for urban growth close to Union Gap's city limits. Based on similar comments

given at the August 27, 2025, special meeting of the Planning Commission staff's recommendation was altered as outlined in the staff report.

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

Staff Response: Staff appreciates the comments and their submittal.

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

Staff Response: Staff addresses this in response to P9, L14.

UGA Staff Report Comparison - Vacant Residential Land Analysis

Staff Response: Staff worked collaboratively with each municipality in Yakima County. An important policy difference for this periodic update (as opposed to the last one in 2016) is the changes made under Senate Bill 5593 in 2022. Counties can alter UGA boundaries for the succeeding 20-year period to reflect changes in development patterns if: one, overall changes to the urban growth area are not required to accommodate the urban growth projected to occur in the succeeding 20-year period. Two, providing "the areas added to the urban growth area are not or have not been designated as agricultural, forest, or mineral resource lands of long-term commercial significance" (RCW36.70A.130(3)(c)(ii)).

A majority of cities/towns within Yakima County are surrounded by designated agricultural lands of long-term significance and/or areas that were previously designated as agricultural lands of long-term significance. There are some places where this does not occur, but they were not the areas identified by cities as places where their development patterns have shifted. Additionally, the vast majority of other UGAs have sufficient land to accommodate growth for the planning period. If it were not for these criteria, there would be more UGA boundary alteration proposals across the county. There are other criteria to consider for changes to UGA boundaries, but for Yakima County, the criteria listed make changes quite prohibitive. Staff also raises the issue caused by RCW36.70A.130(3)(c)(ii) to the Department of Commerce at every opportunity.

Staff also continue to collaborate with cities on potential changes to other UGAs (for example, see the letters sent out for the City of Tieton). In multiple LCA reports, staff highlight areas for further examination for potential rezoning, resizing, and/or removal from UGAs within the county, and ongoing discussions regarding those changes will occur after the full completion of the periodic update.

Proposal for Rural Residential (RR 2.5) Zoning or Equivalent

Staff Response: Staff appreciate the comments and suggestions regarding the establishment of a new zoning district. Establishing a new zoning district is a robust and long process that cannot be completed as part of this periodic update cycle. The Rural – 10/5 (R-10/5) Zoning District and Rural Transitional (RT) Zoning District do allow for clustering as discussed in the staff report. The R-10/5 requires cluster divisions to maintain one dwelling unit for every five acres (as Area One qualifies for the density) during the cluster division. Lots in the cluster can be one to three acres, and as cited in the staff report, the R-10/5 Zoning District allows individual wells for cluster divisions provided those wells can be converted to community wells in the future. The RT Zoning

District allows a density of one unit for every two acres for cluster divisions. Clustering in the RT requires three acres or half of the total project site to be reserved for open space, and community wells are required for all subdivisions in the RT Zoning District. All community wells (and roads) must be installed before finalization of a subdivision.

On the face, the zoning districts provided in Attachment 2 represent a variety of rural zoning districts that may or may not assist with the desires of the Area One property owners. Thurston County's limited areas of more intense rural development (LAMRID) zoning districts are called out, and LAMIRDS are a separate rural category governed by their own RCWs. On the face, some of the zoning districts highlighted contain a one unit for every five-acre density requirement. Other zoning districts reference agricultural zoning. Without knowing the future land-use designation for properties, the development standards may not apply, as agricultural resource designations and rural designations are treated differently under the GMA. It is also important to note that any new rural zoning district must comply with the GMA requirements of today, which may or may not favor the property owners' wishes. Multiple changes can occur on such a proposal from the first draft to final adoption by the Board of County Commissioners, and it would be inappropriate for staff to guarantee any applicant that their proposal will be approved or that the end result will favor their desires.

P12,L19/Conclusion

Staff Response: A legislative action of altering the zoning map does not impact any legal access determinations. There could be items relating to a conditional use permit and a development agreement associated with a rezoning, but not the physical changing of the map.

The first meeting held with Union Gap on June 26, 2024, was primarily a discussion to agree on the City of Union Gap's population projection percentage. The idea of considering the removal of Areas One and Two was first brought up at the Friday, August 14, 2025, meeting. As soon as possible, on Tuesday, August 19, 2025, letters were sent out to property owners (and the Yakama Nation) to inform them of the August 27, 2025, special meeting of the Planning Commission, where the topic would be addressed. A portion of the meeting was intended to receive feedback from the property owners of Areas One and Two. Based on the feedback provided at the meeting, the staff's recommendation was altered to place Area One into the R-10/5 Zoning District and Rural Self-Sufficient Designation for reasons stated within the staff report. The process of commenting and public hearings is specifically designed to take multiple viewpoints into consideration. Staff notes and appreciates the comments from Area One property owners regarding the timing of notification and will take them into consideration on future proposals. If the Planning Commission votes to keep Area One within the UGA after consideration of the record before them, staff will, of course, support their recommendation.

Based on the current Single-Family Residential (R-1) zoning of Area One, as municipal and regional water and sewer are not available, the R-1 Cluster Division is the prime subdivision option for Area One. As discussed in the staff report, the required density for R-1 cluster divisions is four to seven units per acre, far higher than the property owners have stated throughout their letter for their desired intentions. As the Area One property owners have made clear their preference to subdivide and utilize wells, staff highly encourages the property owners to contact the Yakima County Fire Marshal's Office (FMO) and the Yakama Nation. The FMO can provide important feedback regarding fire apparatus access road requirements, access issues, and bring

other important emergency vehicle information to the property owners' attention. Some of the responses will depend on the potential of the lots the access will serve. As Area One is within the Yakama Nation and not connected to municipal water, all water rights for wells must come from the Yakama Nation. The Area One property owners should reach out to the Yakama Nation to discuss water rights and other potential cultural resource items that could come up during the review process.

Oversized unincorporated UGAs lead to urban sprawl due to "leapfrog" development, making further UGA changes difficult as areas become urbanized away from the adjacent city limits. RCW36.70A.110(2) requires the UGA to support growth for the subsequent twenty-year planning period (twenty-two years in this instance, as the period under examination is from 2024 to 2046). The LCA analysis shows Union Gap's UGA carrying capacity exceeds this threshold.