

Winlock UGA Expansion Request

City of Winlock, Washington

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WINLOCK UGA EXPANSION REQUEST & STUDY

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Purpose

The purpose of this report is to support a request by the City of Winlock on behalf of a private applicant, CHI/Acquisitions CA, LP, which seeks to revise the Winlock urban growth area (UGA) to include +/- 101 acres that contain a single parcel of +/- 77 acres currently zoned RDD-20. The entire expansion area is within the Urban Reserve Area (URA) overlay as shown in Figure 1 (below) and Map Exhibit 1 (attached).

The land use designations and zoning sought for the expansion area include +/- 24 acres of commercial and +/- 53 acres of light industrial, not inclusive of rights of way, as shown in Figure 2 (below) and Map Exhibits 2 (attached).

Figure 1 – Proposed Expansion Area



Figure 2 – Proposed Land Use & Zoning



Report Summary

The report finds that the Winlock UGA currently has an employment capacity surplus of $\pm 0.45\%$ and an expansion could be considered to ensure sufficient employment opportunities consistent with the population allocation for the Winlock UGA and the broader the employment needs of out-commuters from the cities of Toledo and Vader, as well as the surrounding rural areas.

Timeline for Request

The following is a timeline associated with the preparation of this expansion request:

November 29, 2021

The City of Winlock receives a request to consider applying to Lewis County for a +/- 77-acre expansion to the Winlock UGA. The expansion area is within an area previously designated as an Urban Reserve Area (URA), which overlay was intended to preserve areas adjacent to UGAs for future urban development by minimizing densities until such time as that might occur.

December 8, 2021

The Winlock City Council considers the request and votes in favor of submitting the proposed expansion on the basis of that the requestor pay for the preparation of the required application materials before the April 1, 2022, deadline and agree to pay for the cost of the application, if any, and any third party studies or environmental review that may be required by the County.

December 2021 to March 2022

Toyer Strategic Advisors prepares an initial request for the UGA expansion.

March 28, 2022

The Winlock City Council holds a duly noticed public hearing to take citizen comments on the UGA report prior to its submission to the County. The comments are summarized at the end of this report.

March 30, 2022

Winlock submits the proposed expansion to Lewis County.

April 2022

Lewis County and the Planned Growth Committee being review of the proposed expansion.

May 2022

The City of Winlock withdraws the proposed expansion to make revisions.

March 2023

The City of Winlock resubmits a revised expansion proposal to Lewis County for processing.

April 2023 to TBD

Lewis County's Planned Growth Committee and Planning Commission are anticipated to review and make recommendations on the city's request to the Lewis County Board of Commissioners who will make a final decision.

A Non-Project Action

The proposed expansion is a plan-level request, meaning that the action sought is a non-project action with no associated site-specific development plan. Non-project actions are reviewed under the State Environmental Policy Act (SEPA), but the type of analysis focuses on the likely impacts of the land use and zoning change as opposed to development specific impacts based on the use, intensity, and physical characteristics of an actual development proposal.

Overview of Winlock's Planning History

In June of 1997ⁱ, Winlock first adopted a Growth Management Act (GMA) comprehensive plan which recognized the potential for growth to occur along the I-5 corridor in south Lewis County at key interchanges like I-5 and SR 505. The 1997 Plan emphasized the importance of creating local employment and expanding the city's tax base, planning that both would come from encouraging firms to develop outside the downtown core of Winlock. The 1997 Plan further acknowledged that Winlock would need additional employment lands in the future (retail, commercial, light industrial) as its population grew.

In 2002, the US Forest Service awarded a grant to Winlock that supported the development a five-year economic development strategy to address the community's declining jobs base. Known as the "Winlock 2007: A Five-Year Community Action Plan 2002-2007"ⁱⁱ this report identified a strong local desire for the city to maintain its existing small-town character while substantially increasing economic development opportunities. The strategic vision of the plan identified development at the I-5 interchange as a significant step forward, which vision was unanimously endorsed by the citizen task force charged with writing the plan. The plan's preferred alternative would have added 4,028 acres of land to the UGA at that time, but the area was later reduced.

The comprehensive plan was subsequently updated to reflect changes to Countywide Planning Policies in 2005ⁱ that allocated Winlock a 2025 population target of 2,550. Winlock's comprehensive plan was amended to incorporate the 2025 population target and further emphasize the importance of concentrating new commercial and light industrial land in those portions of the UGA near the I-5 interchange but staying west of I-5ⁱ with a spine of residential development along SR 505.

Also in 2005, the Lewis County Economic Development Council commissioned a study by E.D. Hovee & Companyⁱ to review the broader need for industrial lands in south Lewis County to address declining employment and respond to market demands. This report called for a countywide net increase in industrial land of 3,038 acres.

This was followed in 2009 through 2011 by a grant from the Washington State Department of Community, Trade and Economic Development which partially funded development of “South Lewis County Subarea Plan” intended to guide future decision making for land use, capital facilities investment, and economic development in an environmentally sustainable way through 2030. The subarea planning process was facilitated by Lewis County and involved a South Lewis County Subarea Steering Committee appointed by the Board of Commissioners. As part of the study, a technical analysis was prepared to create economic, land use, transportation, and environmental profiles of the subarea which described current conditions, forecast potential development opportunities, and set a foundation for proposed goals, policies, and strategies. The plan was intended to be adopted into the Lewis County Comprehensive Plan but ultimately the Lewis County Planning Commission referred the plan back to staff for additional reviewⁱⁱ. The October 2011 Committee Alternative recommended urban reserve overlays be applied to three of the four corners of the interchange between I-5 and SR 505 with the southwest corner being within the Winlock UGA.

The most recent update to Winlock’s comprehensive plan was completed in 2019 based on the 2040 population target of 4,550. Additionally, an updated analysis of capital facility and infrastructure needs was included.

Urban Growth Area Boundaries - Requirements

UGA boundaries are established in accordance with the GMA. The criteria for their sizing is found in RCW 36.70A.110 and 36.70A.115, which establishes that UGAs must consist of areas and densities to permit the urban growth that is projected to occur in the county or city for the succeeding twenty-year period and that “each city within the county must include areas that will accommodate the broad range of needs and uses that will accompany the projected urban growth including. . . commercial, service, retail and other nonresidential uses.” 36.70A.110(1),(2). Counties are required to use OFM population projections for the twenty-year period which projections are adopted in applicable countywide planning policies. RCW 36.70A.115. UGAs may include territory outside of a city if the territory is already characterized by urban growth or adjacent to territory already characterized by urban growthⁱⁱⁱ. Lastly, UGAs may be sized to account for greenbelts and open space, as well as a reasonable land market supply factor.

In *Thurston County v. W. Wash. Growth Mgmt. Hearings Bd.*^{iv} the Washington Supreme Court ruled that “although the GMA does not explicitly limit the size of a UGA, to give meaning to the market supply factor and in light of the GMA goal of reducing sprawl, we hold a county’s UGA designation cannot exceed the amount of land necessary to accommodate the urban growth projected by OFM, plus reasonable land market supply factor.” And further that, “Depending on local circumstances, 15 percent may be reasonable in one county, while 40 percent may be reasonable in another.”

To determine support for an expansion, an analysis was performed which looked at the projected population for the Winlock UGA, the existing zoning within the UGA, the future land capacity available for commercial and non-residential employment in the UGA, likely employment densities based on zoning and future uses, and whether the existing land capacity can support an employment figure consistent with the county’s adopted population projection for the Winlock UGA.

Population & Employment Projections

According to the Countywide Planning Policies and the Winlock Comprehensive Plan, Lewis County has adopted OFM population targets for 2040 for the county and each of the cities. A population allocation of 4,550 was adopted for the Winlock UGA. However, Lewis County and its Growth Policy Committee have not established employment targets for the county and its UGAs. To determine whether the Winlock UGA should be expanded, the city's request analyzes the existing and projected population for Winlock, as well as the city's projected employment to determine whether the city has sufficient commercial and non-residential land capacity to match its adopted population projection.

Data from the Washington Office of Financial Management (OFM) shows that the Winlock UGA had 713 total housing units in 2020. By contrast the current Winlock Comprehensive Plan, adopted in June 2019, states that as of 2004 the city had 700 jobs and 616 dwelling units¹, which provides a jobs-to-housing ratio of approximately 1:1 despite the fact that the city has stated it had been planning for a "projected a 'job to housing ratio' of 1.7:1 (3,034 jobs to 1,775 dwellings) by the year 2025."

The American Planning Association indicates in its research that academics a range of 1.3:1 to 1.7:1 is typically considered balanced.^v Examples from other literature and studies show that the Metropolitan Washington Council of Governments advocates for a 1.54:1 ratio^{vi} as a balance between housing and jobs; Bastrop, Texas (a community of approximately 8,800) has a ratio of 1.9:1^{vii}; and the Environmental Protection Agency's 2014 EnviroAtlas^{viii} suggests that a ratio of 0.75:1 to 1.5:1 is beneficial for reducing vehicle miles traveled, noting that every 10% increase in the number of jobs in the same occupational category within 4 miles of a residence was associated with a 3.3% decrease in daily work-related vehicle miles traveled.

Moreover, other studies and reports indicate that metropolitan areas or jobs centers often have substantially higher jobs-to-housing ratios. For example, Hillsboro, Oregon has a downtown jobs to housing ratio of 3.7:1.^{ix}

Further, given that Winlock's has the largest potential for employment in south Lewis County, Winlock may expect to attract a higher ratio similar to that of a metro area, downtown or regional industrial center.

Winlock's adopted ratio appears consistent with its long-term land use objectives, the proximity of its UGA to I-5 and other communities in south Lewis County, and its distance (and the distance of south Lewis County) from the county's largest cities Centralia and Chehalis to the north.

Table 1 shows the employment status of residents within the City of Winlock as of 2021 as well as the most current estimate for 1.7:1.

Table 1 – Employment Figures

| | Current Employment Estimate² (2021 ACS^x) | Current Employment Estimate Place of Work (Census LODES^{xi}) |
|------------|---|--|
| Employment | 667 | 437 |

¹ Note that it is not clear from the comprehensive plan what the source of data was and whether the employment figure was identified using Place of Residence or Place of Work. For purposes of this request, the analysis uses place of work to reflect that some residents are employed outside the city and its UGA.

² American Community Survey, 2021

The U.S. Census American Community Survey (ACS) Five Year Estimate indicates 667 workers with a margin of error (MOE) +/-177 with a 90% confidence interval. Alternatively, the U.S. Census *OnTheMap* Application, which uses LEHD Origin-Destination Employment Statistics (LODES), indicates that 437 people are employed in Winlock, but only 16 people are both living and employed within the city limits of Winlock. LODES does not indicate a margin of error (MOE) or confidence interval. This report utilizes the LODES figure to establish a base employment from which to analyze future employment levels consistent with the city's jobs-to-housing ratio.

Because the data lags between the reports and what's happened on the ground, the analysis in this report incorporates some adjustments (described later) to account for the recently completed Lowes distribution center and that project's impact on land supply and employment figures.

One of the purposes of achieving a jobs-to-housing balance is the reduction of vehicle miles traveled by commuters. Thus, it is of interest to note that the LODES model's Inflow/Outflow report shows there were 577 workers living in the City of Winlock in 2019 that were commuting to jobs outside the city with Chehalis, Centralia, Seattle, Olympia, and Longview being the top five destinations where these residents work.^{3,4}

Existing City & UGA Zoning

The requested UGA expansion proposes to add 24 acres of commercial and 53.21 acres of industrial land to the Winlock UGA, which is likely to be zoned as C2-Community Commercial and LI-Light Industrial, respectively.

The Community Commercial zone is only applied to an area near the interchange with I-5. This area is distinguished from the C1-Downtown Commercial zone because per the zoning code it envisions more intensive commercial development that is auto oriented. By contrast, the Downtown Commercial zone is envisioned to be less intense commercial development, featuring convenience retail and service oriented business primarily serving the local community. Commercial development at the interchange of I-5 and SR 505 would predictably be of a higher intensity use, serve both the local community and pass by traffic, and be dominated by auto oriented uses. Thus, the analysis for this report focuses on analyzing land capacity in comparable zoning districts and areas where such development would locate.

Although the city uses a single zone for industrial uses (Light Industrial), the city's industrial areas are very different. The industrial area west of downtown features local industries, including manufacturing. The central industrial area on the east side of downtown features transportation related industry. And the industrial area outside the city limits is envisioned to be an industrial park that attracts larger employers in a multitude of industries.

Table 2 (on the following page) highlights the acreage the comprehensive plan allocates to each use and revised figures used for this report's analysis. The differences in the figures are based on this report's use of parcel data to calculate acreage. In two instances the figures for this report are less due to exclusion of certain roadways within the zoned areas, whereas in the third case the figure for this report is higher because the zone was drawn more compactly than the parcel boundary to account for critical areas.

³ LODES data for the Winlock-Pe Ell Census County Division (CCD) that of the 3,027 residents in the selection area who have employment 2,741 of those are employed outside the CCD with Chehalis, Centralia, Olympia, Seattle and Longview being the top five areas where residents commute for employment.

⁴ Similar data through LODES shows that the Toldeo-Vader CCD has 1,487 of its employed residents that work outside the CCD with Longview, Chehalis, Centralia, Seattle, and Olympia as the top five areas where residents commute for employment. Only 27 are commuters to employment within the City of Winlock.

Table 2 – Zoning Acreage

| | Commercial (C2 Zone) | Industrial (Light Industrial Zone) | |
|--------------------|--------------------------------|---------------------------------------|--------------------------------|
| | Outside City Limits (acres) | Inside City Limits (acres) | Outside City Limits (acres) |
| Comprehensive Plan | 106.58 | 41.34 | 565.53 |
| Updated Figure | 93.11 | 46.42 | 554.05 |
| Difference | -13.47 | +5.08 | -11.48 |

Land Capacity Analysis

The following is a land capacity analysis (LCA) for the Community Commercial and Light Industrial zones in the Winlock UGA. This LCA was prepared with similar steps used in the 2020 Kitsap County Land Capacity Analysis & 2014 Methodology Summary (KCLCA), which considered recent legislative updates to buildable lands requirements.^{xii}

Table 3 is a representation of Steps 1 and 2 as used in the KCLCA. Government owned parcels, developed parcels, and already entitled (platted or planned) parcels were excluded. Parcels where improvements were valued at less than the land were classified as underutilized/redevelopable. In consideration of changes in buildable lands legislation, an additional category was added to exclude pipeline projects that are announced and may be at various stages in the permitting process.

Table 3 – Classify the Existing Land Supply

| Area | Description | Zone | Parcels | Vacant | Underutilized/ Redevelopable | Developed ^A | Exclusions & Entitled | Pipeline |
|-------------------------------|-------------------------|-------------------------|---------|-----------------------------------|---------------------------------|------------------------|--------------------------|---------------------|
| | | | | <i>all figures below in acres</i> | | | | |
| 1 | West of Downtown | Light Industrial | 8 | 0.92 | 27.60 | 6.71 | 0.00 | 0.00 |
| 2 | East of Downtown | Light Industrial | 4 | 0.00 | 6.50 | 3.77 | 0.92 | 0.00 |
| 3 | Outside City, in UGA | Light Industrial | 42 | 36.03 | 21.40 | 116.24 | 237.70 ^B | 142.68 ^C |
| 4 | Outside City, in UGA | Community Commercial | 15 | 34.72 | 48.67 | 9.43 | 0.29 | 0.00 |
| 5 | Downtown | Downtown Commercial | 122 | 15.05 | 9.73 | 21.00 | 7.50 | 0.00 |
| 6 | Outside City Limits | Mixed Use | 151 | 38.64 | 42.63 | 159.62 | 0.00 | 6.25 ^D |
| Total Light Industrial | | | | 36.95 | 55.50 | 126.72 | 238.62 | 142.68 |
| Total Commercial | | | | 49.77 | 58.4 | 30.43 | 7.79 | 0.00 |
| Total Mixed Use | | | | 38.64 | 42.63 | 159.62 | 0.00 | 6.25 |

Key Notes for Table 3:

- A. Aerials were analyzed to identify potential differences between assessed valuations, which can lag construction.
- B. Acreage subject to an approved development agreement allowing up to approximately 5.2 million square feet of industrial space. Approximately 1.2 million square feet have been built to date, leaving 4 million square feet anticipated^{xiii}. The development agreement runs until at least 2026.
- C. Exeter has announced it is seeking entitlements for approximately 3.25 million square feet of industrial space.
- D. All parcels in the pipeline were single-family residential lots awaiting building of a home.

Tables 4 and 5 outline the steps used to complete the land capacity analysis for vacant and underutilized/redevelopable lands in Areas 1 through 4 as shown in Table 3. This analysis deviated from certain values used in the KCLCA as follows:

- Varying critical areas reductions were utilized generally based on GIS analysis of likely critical areas and buffers within the area.

- Except for the areas downtown, most commercial, and industrial parcels are large and will most likely be developed with large format buildings (regional scale commercial or industrial). Therefore, the deduction for rights-of-way, stormwater facilities, etc. was reduced in some cases to be more conservative in the analysis.
- Small reductions were taken for future public facilities as no public facility needs for land have been currently identified. Land for the new fire station has already been set aside and zoned for public facilities.
- Market Reduction Factors of 10% to 70% were applied. Vacant lands were given the lower reduction factors, while underutilized/redevelopment areas were given a higher factor because of their location downtown (featuring smaller parcels and buildings, and other constraints and conditions). Additionally, based on the less developed nature of land within the unincorporated portions of the UGA, it is anticipated that landowners may be less willing to sell as they see themselves still view themselves as rural.^{xiv}
- Higher vacancy rates were applied to most zoning areas as the likelihood that the size, age, and condition of existing spaces available are less desirable based on tenant improvement expenses and general marketability, but that the area will see slower absorption of commercial spaces that are not oriented towards the freeway because of the lower population of the area.
- Employment densities used were based on the assumptions discussed in the section of this report entitled "Employment Density" which follows this analysis.

| Table 4 - Industrial (City + UGA) | | Vacant | Under/Redev |
|--|---|---------|-------------|
| | | 36.95 | 55.50 |
| Step 3 | Less 20% for Critical Areas & Buffers | -7.39 | -11.10 |
| | Subtotal A | 29.56 | 44.40 |
| Step 4 | Less 15% for ROW, Stormwater, Utilities | -5.54 | -8.33 |
| | Subtotal B | 24.02 | 36.08 |
| Step 5 | Deduction for Future Public Facilities | N/A | N/A |
| | Subtotal C | 24.02 | 36.08 |
| Step 6A | Apply Market Reduction Factor of 50% | | -18.04 |
| Step 6B | Apply Market Reduction Factor of 25% | -6.00 | |
| | Subtotal D | 18.01 | 18.04 |
| Step 7 | Convert Net Acres to Building SF (0.25 FAR) | 196,163 | 196,428 |
| Step 8A | Apply Vacancy Rate Reduction (35%) | 127,506 | |
| Step 8B | Apply Vacancy Rate Reduction (25%) | | 147,321 |
| Step 9A | Est. Employment (1 employee per 3000 sf - City) | | 49 |
| Step 9B | Est. Employment (1 employee per 3500 sf - UGA) | 36 | |
| | Equivalent Employees Per Acre (EPA) | 2 | 3 |

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| Table 5 - Commercial Lands (UGA) | | Vacant | Under/Redev |
|---|---|---------|-------------|
| | | 34.72 | 48.67 |
| Step 3 | Less 20% Critical Areas & Buffers | -6.94 | -9.73 |
| | Subtotal A | 27.78 | 38.94 |
| Step 4 | Less 15% for ROW, Stormwater, Utilities | -5.21 | -7.30 |
| | Subtotal B | 22.57 | 31.64 |
| Step 5 | Deduction for Future Public Facilities | N/A | N/A |
| | Subtotal C | 22.57 | 31.64 |
| Step 6A | Apply Market Reduction Factor of 60% | | -15.82 |
| Step 6B | Apply Market Reduction Factor of 35% | -7.90 | |
| | Subtotal D | 14.67 | 15.82 |
| Step 7 | Convert Net Acres to Building SF (0.20 FAR) | 127,798 | 137,804 |
| Step 8 | Apply Vacancy Rate Reduction (25%) | 95,849 | 103,353 |
| Step 9 | Est. Employment (1 employee per 750 sf) | 128 | 138 |
| | Equivalent Employees Per Acre (EPA) | 6 | 4 |

Tables 6 and 7 outline the steps used to complete the land capacity analysis for vacant and underutilized/redevelopable lands in areas referred to by Table 3 and 5 and 6. This analysis deviates from values used in other jurisdictions' land capacity reports based on local factors and conditions. Likewise, the assumptions for these areas are different from those in Tables 4 and 5 based on differences in zoning, location, and market influences (housing demand, pricing, etc.). Tables 6 & 7 reflect the following assumptions:

- The mixed-use zone allows up to 75% residential development and a minimum of 20% for any one permitted use type. As Winlock is a more affordable housing market, especially for single family homes, it was assumed that vertical mixed use (based on per square foot costs and other considerations) is less likely to result in significant commercial development. A split in the mix of uses (80% residential and 20% commercial) was used to determine how much land would be used for commercial purposes.
- A reduced critical areas factor was applied based on a survey of County GIS inventoried critical areas.
- A lower deduction was used for right of way, stormwater, etc. in the downtown to reflect the established grid of roads and utilities.
- Very little reduction was taken for future public facilities as no public facility needs for land were identified or known as of the time of this report. Land for existing public facility needs, such as the new fire station, is already set aside and zoned for public facilities.
- Higher Market Reduction Factors were applied to those areas consisting primarily of infill and redevelopment, especial those further away from I-5. Vacant lands were given the lower reduction factors, while underutilized/redevelopment areas downtown were given high rates because they feature smaller parcels and buildings, as well as other constraints and conditions.
- A slightly lower FAR was used for vacant land in the downtown area versus utilized/redevelopable to account for the size of vacant lots, off-street parking requirements, etc.
- The employment densities used are discussed in the next section of this analysis.

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| Table 6 - C1 Downtown Commercial | | Vacant | Under/Redev |
|---|---|--------|-------------|
| | | 15.05 | 9.73 |
| Step 3 | Less 15% for Critical Areas & Buffers | -2.26 | -1.46 |
| Subtotal A | | 12.79 | 8.27 |
| Step 4A | Less 15% for ROW, Stormwater, Utilities | -1.92 | |
| Step 4B | Less 18% for ROW, Stormwater, Utilities | | -1.49 |
| Subtotal B | | 10.87 | 6.78 |
| Step 5 | Deduction for Future Public Facilities | N/A | N/A |
| Subtotal C | | 10.87 | 6.78 |
| Step 6A | Apply Market Reduction Factor of 75% | | -5.09 |
| Step 6B | Apply Market Reduction Factor of 45% | -4.89 | |
| Subtotal D | | 5.98 | 1.70 |
| Step7A | Convert Net Acres to Building SF (0.35 FAR) | 91,179 | 25,849 |
| Step 8 | Apply Vacancy Rate Reduction (15%) | 77,502 | 21,972 |
| Step 9 | Est. Employment (1 employee per 1000) | 78 | 22 |
| Equivalent Employees Per Acre (EPA) | | 13 | 13 |

| Table 7 - Mixed Use | | Vacant | Under/Redev |
|-------------------------------------|---|--------|-------------|
| | | 38.64 | 42.63 |
| Step 2 | 20% Commercial Split Use with 80% Residential | 7.73 | 8.53 |
| Step 3 | Less 18% Critical Areas & Buffers | -1.39 | -1.53 |
| Subtotal A | | 6.34 | 6.99 |
| Step 4 | Less 15% for ROW, Stormwater, Utilities | -0.95 | -1.05 |
| Subtotal B | | 5.39 | 5.94 |
| Step 5 | Deduction for Future Public Facilities | N/A | N/A |
| Subtotal C | | 5.39 | 5.94 |
| Step 6 | Apply Market Reduction Factor of 35% | -1.89 | -2.08 |
| Subtotal D | | 3.50 | 3.86 |
| Step 7 | Convert Net Acres to Building SF (0.3 FAR) | 45,753 | 50,478 |
| Step 8 | Apply Vacancy Rate Reduction (15%) | 38,890 | 42,906 |
| Step 9 | Est. Employment (1 employee per 700 sf) | 56 | 61 |
| Equivalent Employees Per Acre (EPA) | | 16 | 16 |

Tables 8 and 9 outline the steps and assumptions used to complete the land capacity analysis for the proposed expansion, including:

- The analysis only analyzed the development potential of the +/- 77-acre parcel within the 101 acre expansion area. This approach was taken to automatically exclude rights-of-way and infrastructure that presently exists so as not to under or over-estimate the deduction for rights-of-way and utilities within the land capacity calculation.
- A higher critical areas reduction factor was applied based on a tabletop survey of County GIS inventoried critical areas that may be present and would impact site planning in this area.
- A typical reduction factor was used for right of way, utilities, stormwater, etc. to reflect the potential need to establish a new public road (from SR 505 hearing north), set aside easements for water and sewer lines, and a greater likelihood that additional right-of-way on SR 505 may need to be dedicated for the future improvements to the N/B and S/B interchanges.
- A small reduction factor was applied for public facilities as land may be needed for a future sewer lift or pump station, a substation may be necessary to serve the industrial area, and/or a water storage tank may be required to achieve fire flow.
- A market area reduction factor was applied to the portion likely to be zoned industrial based on the amount of industrial development in the pipeline already to account for market absorption. Similarly, a moderate reduction factor was applied to the commercial area as it is likely to be a freeway

commercial type use which development timing is likely to be contingent upon development of the other two corners of the interchange within the UGA and the development of commercial uses in general along SR 505.

- No vacancy reduction factor was applied.
- The employment densities used in this report are discussed in the next section of this report.

| Table 8 - Expansion Area Industrial | | Vacant |
|--|---|---------|
| | | 53.21 |
| Step 3 | Less 30% for Critical Areas & Buffers | -15.96 |
| | Subtotal A | 37.25 |
| Step 4 | Less 15% for ROW, Stormwater, Utilities | -7.98 |
| | Subtotal B | 29.27 |
| Step 5 | Deduction for Future Public Facilities (3.5%) | -1.86 |
| | Subtotal C | 27.40 |
| Step 6A | Apply Market Reduction Factor of 25% | -6.85 |
| | Subtotal D | 20.55 |
| Step 7 | Convert Net Acres to Building SF (0.35 FAR) | 313,341 |
| Step 8 | Apply Vacancy Rate Reduction | N/A |
| Step 9 | Est. Employment (1 employee per 3500 sf) | 90 |
| | Equivalent Employees Per Acre (EPA) | 4 |

| Table 9 - Expansion Area Commercial | | Vacant |
|--|---|--------|
| | | 23.00 |
| Step 3 | Less 30% Critical Areas & Buffers | -6.90 |
| | Subtotal A | 16.10 |
| Step 4 | Less 15% for ROW, Stormwater, Utilities | -3.45 |
| | Subtotal B | 12.65 |
| Step 5 | Deduction for Future Public Facilities (3.5%) | -0.805 |
| | Subtotal C | 12.65 |
| Step 6A | Apply Market Reduction Factor of 25% | -3.16 |
| | Subtotal D | 9.49 |
| Step 7 | Convert Net Acres to Building SF (0.05 FAR) | 20,664 |
| Step 8 | Apply Vacancy Rate Reduction | N/A |
| Step 9 | Est. Employment (1 employee per 600 sf) | 34 |
| | Equivalent Employees Per Acre (EPA) | 4 |

**Note that the FAR for Table 9 assumes a similar site layout as the Flying J development at 93rd in Tumwater for a freeway commercial use*

Employment Density

Employment densities used in this report are generally consistent with ranges used by other jurisdictions in Western Washington, but this report consider the types of development expected, specifically that development near/at the interchange is more likely to be regional or freeway-oriented commercial and the industrial park development will be large format buildings.

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TYPICAL EMPLOYMENT DENSITIES

Employment densities are typically reflected as either employees per 1,000 square feet (SFE) of building space or employees per acre (EPA).⁵ In both cases the analysis produces a net acre. A literature review of jurisdictions along the I-5 corridor in Washington/Oregon identified densities ranges as follows:

Table 10⁶ – Employment Densities^{xv, xvi, xvii, xviii, xix}

| | SFE | EPA |
|-------------------|---------------|------------|
| Commercial | 200 – 700 | 3.3 to 25 |
| Industrial | 500 – 10,000+ | 0.25 to 20 |

The most relevant local example of employment density is the newly constructed, large format Lowes Distribution Facility, which employs 116⁷ workers in approximately 1.2 million square feet equivalent to an SFE of 10,345 or an EPA of 1.67. Unfortunately, this is a single example whereas employment densities are typically derived from a larger data set of employment generating uses, which often includes a blend of industries (e.g. restaurant, retail, service, etc.).

For this analysis, we used an SFE of 1 employee per 3,500 square feet to project employment density in the industrial zones. A lower SFE could be expected for manufacturing and a higher SFE may accompany specific industries associated with transportation and logistics. Given the parcel sizes, building mix, proximity to I-5, available workforce, etc. the 1 employee per 3,500 square feet is a conservative projection that accounts for likely employment events with a focus on regional warehousing and distribution operations as discussed further below.

Table 11 reflects the equivalent EPA per net acre given the SFE used in this analysis.

| | Vacant | Underutilized/ Redevelopable | In Range (Yes/No) |
|----------------|--------|---------------------------------|----------------------|
| Table 4 | 2 | 3 | Yes |
| Table 5 | 6 | 4 | Yes |
| Table 6 | 13 | 13 | Yes |
| Table 7 | 16 | 16 | Yes |
| Table 8 | 4 | N/A | Yes |
| Table 9 | 4 | N/A | Yes |

The SFE figure was applied to the pipeline industrial projects and calculated against known building square feet that is entitled or announced. Further, considerations were made for the size of the expected buildings, which will likely range from 225,000 to 1.2 million square feet. These large format industrial buildings are likely to be a mix of single and double loaded facilities occupied by regional warehousing and distribution facilities, transportation and logistics operators, wholesale firms, and manufactures.

Table 12 reflects anticipated square feet, employment density and estimated jobs for the remaining pipeline industrial projects within the city's UGA.

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⁵ EPA is based on per net acre, which is noted in several ECONorthwest employment density studies, including Appendix C in the 2021 Pierce County Buildable Lands Report, as being net acres or "land that is available for sale in parcels or lots after roads (right-of-way) has already been deducted."

⁶ Note: illustrated typical ranges based on literature review. Actual figures vary based on jurisdiction and segregation of employment densities by industries as opposed to zones.

⁷ Figure is based on most recent published news report. Specific data wasn't available.

| | Total SF Estimated | Employment Density | Estimated Jobs |
|---------------|--------------------|------------------------------|----------------|
| Benaroya | 1,000,000 | 1 employee per 3,500 sq. ft. | 286 |
| Crow Holdings | 2,600,000 | 1 employee per 3,500 sq. ft. | 743 |
| Exeter | 3,313,508 | 1 employee per 3,500 sq. ft. | 947 |
| | | TOTAL | 1975 |

WORKFORCE IMPACT INDUSTRY

The size, skills, and availability of the workforce in this area will be a factor in the types of industrial opportunities likely to locate in Lewis County, generally, and Winlock, specifically. Workforce figures available for the Centralia Micropolitan Statistical Area (μSA), which encompasses all of Lewis County. JobsEQ® data from 2021 were compiled into “What-if” scenarios for two types of employment events. The first involved the location of a new manufacturing company hiring 200 employees and the second a new warehousing and distribution company hiring 400 employees.

These scenarios produce data on the number of candidates per job opening and foreshadow the level of difficulty an employer may have when hiring, and then later retaining, its workforce. Workforce availability is a critically important corporate site selection factor for making new facilities decisions.

According to the “What-if” scenarios, 61% of the new manufacturing positions would be challenged by a low number of candidates per opening available as compared to only 37% of the warehousing positions. And the average number of candidates per opening for a new manufacturer was 71 compared to 102 for warehousing.

The lesser availability of workers for skilled positions in manufacturing combined with the site location factors mentioned above, support the assumed mix of industries favoring regional warehousing and distribution uses locating in the Winlock UGA and the assumed employment densities.

Reasonable Measures

In conducting the population, employment and land capacity analyses, our firm did not review or evaluate reasonable measures in accordance with RCW 36.70A.215(1)(b) as those are not a required under RCW 36.70A.215(5) based on the Lewis County’s population size. It is our understanding that Lewis County has not completed a building lands study in the past.

Employment Capacity

RCW 36.70A.110(2) requires that cities and counties include areas and densities sufficient to permit the urban growth that is projected to occur for the succeeding twenty-year period and must include areas sufficient to accommodate the broad range of needs and uses that will accompany the projected urban growth including, as appropriate, medical, governmental, institutional, commercial, service, retail, and other nonresidential uses. According to the most current OFM population and housing data for Winlock (released April 1, 2022), Winlock has 1,695 residents and 675 total housing units (an estimated 2.51 people per housing unit). For a population target of 4,550 people by 2040, Winlock would need to have approximately 1,812 housing units and capacity for 3,082 jobs using the city’s 1.7:1 jobs-to-housing ratio mentioned in its comprehensive plan.

The next step was an evaluation of the employment target for Winlock’s UGA against the existing employment capacity assumptions made in Tables 4 through 7 and Table 12. This evaluation was

separated into two Tables (13 and 14) to account for the current pre-expansion employment capacity estimated and then the capacity estimated with the proposed UGA expansion.

The calculations in Table 13 show that the existing land capacity in the Winlock UGA results in a slight employment surplus of 22 jobs by 2040 or less than 0.5% of the total capacity.

| <i>Employment Target (Ratio 1.7:1)</i> | 3,082 |
|--|--------------|
| LODES Existing Job Count (Place of Work) | 437 |
| Census Existing Job Count (Place of Residence) | |
| Account for Lowes DC | 116 |
| Tables 4 & 5: Jobs in Commercial & Industrial | 351 |
| Tables 6 & 7: Jobs in Mixed Use & Downtown | 216 |
| Table 10: Jobs in Entitled/Pipeline Projects | 1975 |
| Employment Capacity | 3,096 |
| Jobs Deficit (-) / Surplus (+) | 14 |
| % Deficit or Surplus | 0.45% |

As shown below, when the proposed expansion area is included within the calculation for employment capacity (Table 14), there is an increase in the employment capacity surplus, but the increase is less than 4.5% of the total.

| <i>Employment Target (Ratio 1.7:1)</i> | 3,082 |
|--|--------------|
| LODES Existing Job Count (Place of Work) | 437 |
| Census Existing Job Count (Place of Residence) | |
| Account for Lowes DC | 116 |
| Tables 4 & 5: Jobs in Commercial & Industrial | 351 |
| Tables 6 & 7: Jobs in Mixed Use & Downtown | 216 |
| Tables 8 & 9: Jobs in Expansion Area | 124 |
| Table 10: Jobs in Entitled/Pipeline Projects | 1975 |
| Employment Capacity | 3,220 |
| Jobs Deficit (-) / Surplus (+) | 138 |
| % Deficit or Surplus | 4.47% |

Given that the Growth Management Hearings Board and courts have generally viewed UGA sizing as a get as reasonably close as you can exercise, they have been accepting of small surpluses in capacity as representing a margin of error especially considering, for example, that a slight shift in employment density for industrial development from 3,500 to 4,000 square feet per employee (as shown in Table 15) would result in an decrease in employment capacity of 247 and yield a capacity deficit of 3.28% as shown in Table 16 (representative of an 8% change).

It is reasonable to assume that land capacity factors besides employment density of specific employers could negatively employment capacity over the next 5, 10 or 20 years, including but not limited to regulatory changes including updates to critical areas regulations, stormwater regulations, etc.

Environmental Constraints

The proposed expansion area may have some environmental constraints; however, the city has adopted codes to reduce and mitigate for potential impacts from development. Because any future site-specific development proposal would be required to submit a critical areas study, geotechnical report, and other

appropriate studies, the following is an overview of the various environmental factors and potential constraints that future development will need to consider:

SOILS

Geology in the area consists of alpine glacial drift pre-fraser and alpine glacial outwash pre-fraser^{xx}. Soils consist of lacamas silt loam with the potential presence of hydric soils. The area is not identified by the county as being within an erosion hazard or landslide hazard area; however steep slopes may be present on the site, especially near the northernmost boundary. The elevation of the developable parcel within the expansion area is 410 feet at the north end, declining to 310 feet at SR 505.

CONTAMINANTS AND HAZARDS

The site is not located within an area flagged by the county as requiring arsenic testing. No other contaminants or hazards are known to exist within the expansion area, but a Phase I has not been completed. A general search of the Washington Department of Ecology's Site Register and Contaminated Sites List^{xxi} identified five sites of interest within two (2) miles of the proposed developable site within the expansion. Information on these sites and their status is shown in Table 12 below.

Table 12 – Contaminated Sites

| Site ID | Location | Name | Description | Status |
|---------|-----------------------------|-------------------------------------|--|---|
| 7809 | 446 Knowles Rd | Boys Ranch/Shell | LUST | Cleaned Up, NFA issued |
| 13322 | S/B I-5 at MP 63.8 | WSDOT | Asphalt oil from ground up asphalt – confirmed soil contamination, suspected surface water contamination | Early notice letter issued in 2017, awaiting clean-up |
| 1534 | 774 Frost Road | Winlock Meter Station – NW Pipeline | Metals contamination in soil | No Further Action (NFA) issued in 2007 |
| 3724 | 276 Drews Prairie Rd | Toledo Meter Station – NW Pipeline | Metal contamination in soil/arsenic | No Further Action (NFA) issued in 2012 |
| 1977 | N Military RD & McCorkle RD | Miller Botanical | Suspected arsenic, asbestos, metals, and petroleum in soils/groundwater | Clean-up Started |

The city has no responsibility or authority associated with the sites identified in Table 12.

SURFACE AND GROUND WATER

The expansion area is not within a critical aquifer recharge area, but a Category I critical aquifer recharge area exists west of the area on the west side of I-5. A search of the Department of Ecology's Well Construction and Licensing map identified no wells on the developable site within the proposed expansion area^{xxii}. However, three wells exist adjacent to this site with two of those to the north and one to the east. The city would require development in the area to utilize the most current stormwater manual

and comply with city codes and standards. These regulations regulate the capture and treatment of surface waters, as well as encourage infiltration to support ground water recharge.

CRITICAL AREAS, VEGETATION & WILDLIFE

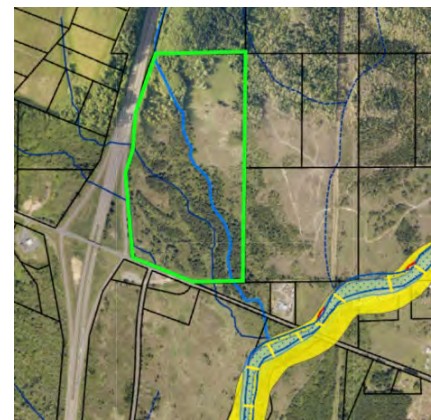
A 2009 study of South Lewis County by the Washington Department of Fish and Wildlife found that there are over 280 species of birds, mammals, reptiles, plants, etc. in the area. The county's GIS system identifies the potential presence of one or more streams in the area, including a potential fish bearing branch of Lacamas Creek. None of these are designated as a shoreline of the state. A search of the Washington Department of Fish and Wildlife Priority Habitats and Species Map^{xxiii} indicates that the Section, Township and Range in which the expansion is located represents potential habitat for the Northern Spotted Owl. Further, the same database indicates the presence of a freshwater emergent wetland in the southwest corner of the expansion area.

Development occurring within the existing Winlock UGA as well as potential future development in any of Winlock's Urban Reserve Areas, is likely to impact vegetation and wildlife such as deer, birds, etc. However, future site-specific development proposals would be required to complete a wetland delineation and undergo review to identify and verify the types and categories of any critical areas on-site as well as their required buffers. The city has development codes in effect and Chapter 4.010 specifically regulates critical areas and buffers.

FLOODPLAIN & CHANNEL MIGRATION ZONE

According to Lewis County's GIS mapping (Figure 3, left; and Map Exhibits 3A and 3B, attached), the proposed expansion area is not located within the 100- or 500-year flood plains or the floodway. Therefore, consideration of inclusion in the Winlock UGA would not be affected by the UGA boundary restrictions outlined in RCW 36.70A.110(8). Further, this supports the city's ability to support this area in its UGA without concern additional facilities or services may be needed to handle flooding.

Figure 1 – Location of Floodplain



ARCHEOLOGICAL & CULTURAL RESOURCES

The Washington Department of Archeology and Historic Preservation maintains and maps information in their WISAARD system specific to cultural and archeological resources. A search of the WISAARD^{xxiv} map does not indicate the presence of any registered historic or cultural resources in the expansion area, but it indicates that the area has low to high probability for archeological resources and an archeologic study would be highly advised as part of the review of a future development proposal.

NOISE

The expansion area is adjacent to I-5 and SR 505, which state routes produce significant noise from traffic occurring throughout the day. Future development of the proposed expansion area for non-residential uses will provide an appropriate transition between I-5 and any future development within the adjacent Urban Reserve Area. The proposed future land use and zoning of the expansion area is likely to attract future development that will generate noise from traffic, processes, etc.; however, WAC 173-60 and the city's code will require compliance with applicable noise standards.

LIGHT

Existing sources of light in the expansion area include streetlights at the northbound and southbound on-off ramps from I-5 to SR 505, as well as the headlights of vehicles traveling both state routes. It is likely that changes to the lighting at these on-off ramps will change with the installation of roundabouts. Future development in the proposed expansion area would be required by code to have lighting with appropriate

light cuts to ensure lighting stays on site. Additional traffic resulting from the development is not likely to substantively contribute to light impacts already present on these busy roads ways.

RELATIONSHIP TO 20-YEAR PLAN

The city will address the environmental constraints identified above (except for contaminated sites) by applying its development code and using the SEPA process to review fully any potential impacts from future site-specific development proposals. During the 20-year planning period, the city will continue to periodically review its codes and standards, adopt new standards as required by law, and apply best available science.

Public Facilities and Services

RCW 36.70A.020(12) requires counties and cities provide adequate public facilities and services at the time development is available for “*occupancy and use*” to ensure that adopted levels of service do not fall below the locally adopted minimum standards. RCW 36.70A.110(3) requires that urban growth be located first in areas characterized by urban growth that have adequate existing public facilities and services, next in those areas served by a combination of existing facilities and services as well as additional needed facilities and services provided by public or private sources, and then to other areas that are within the UGAs. GMA does not require that the sizing of UGAs be limited only to those areas where services are available now or expected to be solely served by public investments in the facilities and services.

As a preface to this analysis of public facilities and services planned for the next 20 years, it is important to note that the City of Winlock fully expects that necessary public facilities and services needed to serve future development in the proposed expansion area will be provided by private sources in the form of improvements and/or contributions towards the cost of those public facilities and services.

SEWER

The City of Winlock is the sole provider of sewer services within the existing city limits and its urban growth area. As new development has occurred, developers have been responsible for extending the City’s sewer infrastructure. Presently, the city’s sewer system has been extended by new development as far east as SR 505 and Michelson Parkway.

Winlock’s sewerage treatment facility will require future upgrades to comply with changes in ecology requirements and the city’s permits. The facility may also require future improvements to expand its capacity. The city anticipates completing a study within the next six years to determine whether sewer treatment facility improvements need to be added to its sewer capital facilities plan; however, this is a study that will be required regardless of this expansion proposal.

Future development east of I-5 would be responsible for designing and extending the sewer system east on SR 505 and across I-5. It is assumed that this extension of sewer would involve force mains and a grinder pump system that would convey the sewer west. Future development would also be responsible for applicable connection and/or system development charges.

WATER

The City of Winlock is the sole provider of water services within the existing city limits and its urban growth area. As new development has occurred, developers have been responsible for extending water infrastructure throughout the UGA. New industrial development off Michelson Parkway added a 240,000-gallon water tank to address fire flow and improve the city’s water storage capacity. A future development is conditioned to install a second 240,000-gallon water tank.

Future development east of I-5 would be responsible for extending water to the east side of I-5 or, alternatively, obtaining water service from the city of Dayton if feasible or using on-site wells if water rights exist.

At this time, the city does not anticipate facility or service improvements will be required to its water system in either the six-year or twenty-year planning horizons. Private development within the expansion area will be responsible for exercising appropriate water rights and/or obtaining water service from either the cities of Winlock or Toledo.

STORMWATER

The City of Winlock does not have a regional stormwater detention facility, nor does it plan to create one. Individual developments are responsible for the design and construction of stormwater facilities on-site that meet the most current DOE Stormwater Manual.

At this time, the city does not anticipate facility or service improvements that the city would be responsible for in the six-year or twenty-year planning horizons. Private development will be responsible for its on-site stormwater.

POWER, GAS, & TELECOMMUNICATIONS

Power is provided to the area by Lewis County Public Utility District No. 1 (PUD) with overhead powerlines running along SR 505 across the southern boundary of the proposed expansion. Likewise buried communications cable runs along the expansion area frontage on SR 505. Natural Gas is provided to Winlock and its vicinity by Puget Sound Energy. Telecommunications are provided by a variety of telecommunications companies serving the area. Each of these utilities would provide service to the future expansion area based on the anticipated uses, expected loads (electric and natural gas), and data/communication needs of individual uses. Extensions and system upgrades to these utilities, particularly power, to serve new development may be required, but are paid for by the new development they serve.

The city acknowledges the services provided by these utilities, but the city does not include specific improvements in its six-year or twenty-year plans. However, it is worth noting that Lewis County PUD is in the design process of a 25MW substation expected to be operational in the fourth quarter of 2024 to serve the industrial development in the UGA.

FIRE & EMERGENCY SERVICES

The proposed expansion area is at the western edge of Fire District No. 2 (Toledo Fire Department) and adjacent to Fire District #15, which serves Winlock and Winlock's growing industrial park. Based on the proposed land use designation and zoning for the expansion area (commercial and industrial), the uses will require fire suppression systems for their structures. However, the proposal may result in increased demand for EMS calls and/or the need for new equipment in the future. Any future development may be required to install a water storage tank onsite to meet fire flow requirements.

PUBLIC SAFETY

The city anticipates a relatively low volume of police calls for service associated with addition industrial and commercial development in the expansion area, the city has plans to continue to expand its police department staffing as the city annexes the UGA. The city currently has three full-time police officers. As the city grows, it will add additional police officers as needed based on commonly accepted staffing models.

SCHOOLS

The proposed expansion area is located within the Winlock School District. No residential uses are proposed that would result in increased student generation rates. The City does not anticipate facility or service improvements that the school district would need to add to its six-year capital facilities plan because of this expansion proposal.

LIBRARY

Winlock's library is part of the Timberland Regional Library system. The Winlock Library is in a 2,080 square foot building owned by the city with recent improvements in 2020 that include new paint, flooring, furniture, shelving, and more. The library is funded through local property taxes, sale of tax title properties, timber excise taxes, DNR trust funds, grants, etc. Among the many services the library provides are free access to public computers and Wi-Fi. These services are occasionally used by those living locally who are seeking employment and need this access to apply for jobs online. The land use designations and zoning for the proposed expansion area would create future employment capacity in the UGA, but the city does not anticipate this expansion to create additional demand on the library system that would result in the need for increased services.

PARKS & RECREATION

The proposed expansion area would have future land use designations and zoning for commercial and industrial uses. Winlock's development code currently requires that commercial and industrial development have a minimum of 15% and 20% of their site landscaped, respectively. Additionally, commercial and industrial developments in the city are required to provide pedestrian amenities with industrial development being specifically required to have a pedestrian access plan and commercial development being specifically required to consider pedestrian plazas and other pedestrian amenities.

RELATIONSHIP TO 20-YEAR PLAN

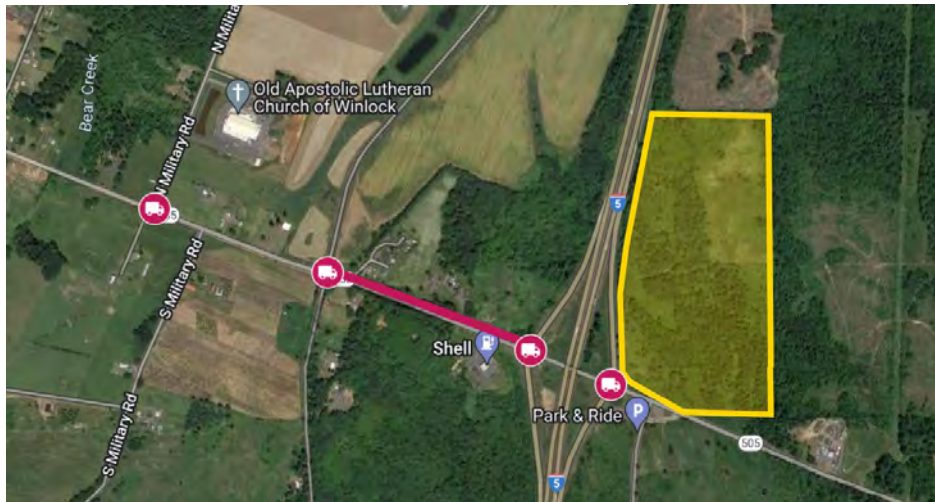
Private development in the expansion area will be responsible for extending, improving, and/or expanding conveyance and capacity for wet and dry utilities. Regardless of the expansion, the city anticipates it will need to periodically study its water and sewer capacity to ensure appropriate future improvements are made to facilities to address upgrades because of new regulatory guidance, any future increases in population capacity within the UGA, etc. Based on the proposed land use designation and zoning for the expansion area, the city does not anticipate it will need to address other public facilities and services within either its six-year or twenty-year capital facilities plans, but provided the expansion were approved, the city will need to coordinate planning with other agencies such as the Toledo Fire Department.

Transportation

Transportation will be a top concern as the Winlock UGA continues its build out. New development will continue to locate primarily along SR 505 and North Military Road. Improvements are planned for both roads in accordance with the development agreement and SEPA conditions for the industrial development off Michelson Parkway. The future improvements to North Military Road, SR 505, and the on-off ramps for I-5 at SR 505 include four roundabouts (shown as red truck icons) and an acceleration lane (shown as a red line) westbound on SR 505 from I-5 to Michelson Parkway (see Figure 4). These improvements are currently being designed and permitted and will be constructed soon.

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Figure 4 – Future Transportation Improvements



EXISTING CONDITIONS

The proposed expansion area is at the northeast corner of the interchange of I-5 and SR 505 (the yellow area in Figure 5, above). The site has frontage on I-5 and SR 505 and is directly across SR 505 from Camus Road and an existing gravel surface park and ride lot. No roadways currently exist to access this site from SR-505 to the north. No transit stops or service are present in the expansion area.

FUTURE CONDITIONS

With the future roundabouts at I-5 and SR 505 being a condition of the industrial development on the west side of I-5, these improvements are being designed to accommodate both truck and passenger vehicles. Based on the future land use and zoning proposed for this expansion area, the development pattern is anticipated to consist of commercial uses primarily serving pass by traffic on I-5 and industrial development locating proximate to I-5 for easier truck access. As a result, the potential for impacts to transportation are very localized to the expansion area with few impacts anticipated west of I-5.

Winlock will require that future development in the expansion area complete a project-specific transportation impact analysis (TIA), which would be reviewed by the city and the Washington State Department of Transportation (WSDOT). Completion of a project specific TIA may identify improvements required to SR 505 (along the project's frontage) requiring additional right-of-way (ROW) dedication and/or widening of SR 505 to add a left turn lane into either the parcel's future access or a future north-south road. The city code requires future development to construct frontage improvements.

RELATIONSHIP TO 20-YEAR PLAN

At this time, the city does not anticipate it will be required to make transportation improvements in either the six-year or twenty-year planning horizons as private development will be responsible for improvements that will be coordinated with WSDOT.

Policy Consistency Analysis

There are multiple Countywide Planning Policies and Comprehensive Plan Goals and Policies that speak to the sizing and/or expansion of urban growth areas. The following is a review of these policies and how

this proposal is consistent. The goals and policies are show in regular text, while the responsive analysis is in blue text for ease of reference.

COUNTYWIDE PLANNING POLICIES

1. **Urban Growth.** Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.

The proposed expansion area was previously designated as an URA, which was a deliberate action of the county to identify the area for future expansion. Public facilities and services can be provided in an efficient manner as demonstrated in the prior analysis of this report.

- 1.0 Urban growth shall be encouraged within cities and their designated urban growth boundaries or other areas in the County characterized by urban growth and areas approved as industrial master planned areas, master planned resorts, and as new fully contained communities pursuant to RCW 36.70A.350.

The proposed expansion area is an “other area in the County” where prior policy decisions led to its designation as an URA. The URA acts as an overlay to limit rural development to ensure that expansions of these areas can happen and appropriate urban densities and levels of service acheived.

- 1.1 Cities and towns and all urban growth areas shall include areas and residential densities (except for industrial master planned areas) sufficient to accommodate the majority of the County's adopted 20-year population projection. A portion of the county's 20-year population projection shall be allocated to new fully contained communities pursuant to RCW 36.70A.350(2). Annual adjustments may be made when supported by appropriate data.

As shown in this report's land capacity analysis, the proposed expansion is consistent with the adopted 20-year population projection for the UGA and ensures sufficient land for employment.

- 1.2 Land use planning for the urban growth areas should provide for urban densities of mixed uses (except for industrial master planned areas) where logical and existing and/or planned urban services are available. Affordable housing policies and urban density policies should have equal value in evaluating and/or planning new or expanded housing areas.

The proposed expansion includes a mix of uses (commercial and industrial) which are consistent with the area's location at the interchange of SR 505 and I-5.

- 1.3 Urban Growth Area boundaries for cities and towns will include the entire rights of way of public streets, roads or highways. And, where right of way is insufficient to implement design standards or other such considerations, may follow natural or logical parcel boundaries.

The boundary of the proposed expansion includes those portions of rights-of-way associated with SR 505 and I-5 to ensure the entire rights of way associated with the area is within the UGA. Other boundaries used reflect the parcel lines in the area and the existing UGA boundary.

- 1.4 Seek to ensure that development in the unincorporated Urban Growth Areas of cities conforms to applicable City development regulations.

The county applies the city's standards in the UGA and future development will be consistent.

- 1.5 All jurisdictions whose UGA boundaries adjoin Interstate 5 or other U.S. Highways shall work towards establishing consistent development standards to protect and enhance a locally significant desired community image along the Interstate 5 or U.S. Highway corridors.

The city has existing design standards that will ensure consistent development along the I-5 corridor.

- 1.6 The County and those cities whose UGA boundaries adjoin the Interstate 5 and U.S. Highway corridors shall work with the Washington State Department of Transportation (WSDOT) to develop minimum landscape standards for interchanges along the Interstate 5 and U.S. Highways.

The city has a history of working with the county, developers and WSDOT to ensure improvement at the interchange of SR 505 and I-5 are completed in accordance with design standards, including appropriate landscaping.

- 1.9 The County and cities shall inform the appropriate jurisdictions concerning proposed development or activities that would impact urban resources and/or urban growth areas.

This report is submitted as the city's application for a UGA expansion. Notice was given and a public hearing held by the city prior to the city's final action to send this application to the county to initiate the review process – a process that includes additional notice and review by agencies, the public, the Planned Growth Committee, the Planning Commission and Board of Commissioners (among others).

- 1.12.1 Based on growth management population projections made for the county by the Office of Financial Management, the county and each city within the county shall include areas and densities sufficient to permit the urban growth that is projected to occur in the county or city for the succeeding twenty-year period. Each urban area shall permit urban densities and shall include greenbelt and open space areas. An urban growth area determination may include reasonable land market supply factor and shall permit a range of urban densities and uses. In determining this market factor, cities and counties may consider local circumstances. Cities and counties have discretion in their comprehensive planning process to make many choices about accommodating growth.

Winlock's proposed UGA expansion includes a detailed analysis of city's population target, necessary employment target, employment densities and land capacity needs. The proposed expansion would address a deficit in commercial and industrial lands to support employment growth over the succeeding 20-year period consistent with Winlock's countywide adopted population target.

- 1.12.2 The provision of an adequate supply of land available for urban intensities of development shall be available to accommodate the population and economic growth of Lewis County.

This proposed expansion is necessary to address a deficiency in employment generating land uses in order to accommodate the population and economic growth of Winlock and Lewis County.

- 1.12.3 The expansion of urban growth areas shall be given priority when need is demonstrated by the local jurisdictions and the lands that are to be incorporated into a UGA exhibit conditions consistent with RCW 36.70A.110. The extension of UGA boundaries into resource lands of long-term commercial significance should be avoided unless no practical alternative exists.

The proposed expansion area is not an area with resource or agricultural lands of long-term commercial significance. In fact, the proposed expansion area is in the URA, which by nature contemplates that it will be the location where expansions of the UGA are first considered. The City has reviewed, as part of this report, the conditions in RCW 36.70A.110 in the preceding sections of the report.

1.12.4 Requests for Amendments to Urban Growth Areas in the Comprehensive Plan will be reviewed according to the following criteria, as set forth in RCW 36.70A.130(3):

a. Determination of needed land

This report demonstrates that the city needs a UGA expansion to make up for a deficit in employment generating land consistent with the city's population target.

- i. Are the overall UGA's in the county large enough e.g. is the land existing in inventory of lands within the existing UGA adequate in quantity to accommodate the County's 20-year population and employment forecasts at urban densities?

This report did not complete a review of all UGAs and their land supply. The County does not have adopted employment targets and it is unknown as to the jobs-to-housing ratios (if any) that may be applied in other UGAs. Unlike other more urban counties, Lewis County's UGAs have greater distances between them, making it more likely individual UGAs need to be evaluated to ensure a housing-to-jobs balance so as to limit transportation impacts associated with commuting, etc. Additionally, individual UGAs need to have an appropriate mix of land supply so as to ensure that they capture the property, sales tax, and other local taxes necessary to provide sustainable urban services over the 20-year planning period.

- ii. Is there an inventory of development including vacant land, underdeveloped lands and land where development is likely?

Specific to the Winlock UGA, no. This report highlights the development capacity and developability of the Winlock UGA, finding that a deficit of employment lands exists.

- iii. Is there land within the UGA that can accommodate the urban services needed for urban densities?

The land within the existing Winlock UGA has (or will have) the urban services needed to supply urban densities. Some of these facilities and services are being created or contributed to by private development as it happens. The proposed expansion is necessary to accommodate for a general deficit of employment lands.

- iv. Are there lands outside the incorporated Cities or their associated UGAs that currently exhibit an urban density and urban character?

There is no land exhibit urban densities that falls immediately outside the Winlock UGA. However, the county previously designated the interchange of I-5 and SR 505 as an urban reserve area, essentially saving it for future expansion of the Winlock UGA.

b. Consistency with GMA objectives

- i. Is the amendment made necessary by an emergency that can be eliminated by the extension of urban level of service?

No. The proposed expansion is not being sought because of an emergency that could otherwise be solved by the extension of urban services.

- ii. What impact would the amendment have on the existing level of services within the UGA?

The city does not anticipate that the impact will have any impact on existing levels of service within the UGA due to the location (adjacent to I-5 and SR 505) and the fact that private development would be responsible (as it is within the UGA) for extending utility infrastructure needed to serve the site. The preceding sections of the report analyzed for potential impacts to facilities and services, identifying only those impacts which development would need to show it can resolve prior to obtaining necessary approvals to commence.

- iii. What is the ability to provide services within the UGA?

The proposed expansion is not due to a lack of services or ability to provide services inside the UGA.

- iv. Will the contemplated amendment result in any environmental degradation?

No. The City has critical areas regulations, development standards and other regulations in place to ensure that land can be developed without degradation to the environment.

- v. Does the amendment being considered comply with the objectives of the GMA; does it promote sprawl or does it hinder development within the UGA at an urban density?

The proposed expansion is consistent with the objective of GMA and does not promote sprawl or hinder development in the UGA at urban densities. There is significant demand for additional large industrial buildings nationwide as the result of changing consumer demands (more e-commerce), deficiencies in traditional supply chain and 'just-in-time' models exposed by COVID, and a renewed effort by companies to re-shore.

- vi. Is the amendment consistent with the County Comprehensive Plan and other plans of affected jurisdictions?

Yes. Winlock has a deficit of employment generating land for the future that if unaddressed would have spill over impacts to other urban growth areas in Lewis (or Cowlitz) counties.

- 1.12.9 Subject to applicable law, Urban Growth boundaries shall not be reduced solely on the basis of inactivity of annexation by cities.

The City of Winlock is moving forward with annexation of its existing urban growth area consistent with the intent of GMA that cities be the appropriate providers of urban levels of service to areas with urban densities.

2. **Reduce Sprawl.** Reduce the inappropriate conversion of undeveloped or rural land into sprawling, low-density development.

The proposed expansion does not result in an inappropriate conversion of undeveloped or rural land into sprawling, low-density development. The area where the expansion is contemplated is within a urban reserve area – identified by the county in prior planning as the next logical place for a UGA expansion to occur once needed. This report outlines that need. The proposed land uses would not be “low-density” development, but consist of urban levels

- 2.2 Large-scale commercial and industrial development shall be located in designated UGAs, or areas authorized by state law, where adequate utility services and transportation networks are available or planned.

The proposed expansion complies as it is in a location where utility services and transportation networks either presently exist or could be planned within the 20-year planning horizon.

3. **Transportation.** Encourage efficient multi-modal transportation systems that are based on regional priorities and coordinated with County and City comprehensive plans.

The proposed expansion area is at the intersection of I-5 and SR 505, which provides an opportunity to locate developments that require proximity and ease of access to the interstate. The proposed land use designations and zoning for this expansion area recognize the area’s relationship to transportation infrastructure.

4. **Economic Development.** Encourage economic development throughout Lewis County that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens, especially for unemployed and for disadvantaged persons, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of Lewis County’s natural resources, public services and public facilities.

This proposed expansion is consistent with the City’s economic development element of its comprehensive plan, as well as prior planning completed by the city that identified a jobs-to-housing ratio target of 1.7 jobs per 1 house.

- 5.2 A diversified economic base should be encouraged to minimize the vulnerability of the local economy to economic fluctuations.

This should be looked at in two ways.

First, the amount and type of economic diversity needed by Winlock within its UGA (eventual city limits) to sustain local public facilities and services required for its urban population. Winlock has a population allocation of 4,550. To provide the necessary public facilities and services to serve its population, Winlock needs a large enough non-residential tax base to produce tax revenues that cover the more expensive residential development. Additionally, Winlock’s proximity from other urban growth areas and jobs centers requires that it have a sufficient employment base (jobs-to-housing ratio) to limit lengthy commuting patterns. As identified earlier in this report, the Census’ LODES model’s Inflow/Outflow report shows there were 577 out of 1,791 (31%) residents in 2019 that were commuting to jobs outside of Winlock and its UGA (as the commercial and industrial lands were vacant then). That adds substantial traffic to SR 505, I-5, and roads within the other jurisdictions where the jobs are located.

Second, diversity across the County’s economic base to limit vulnerability to economic fluctuations. The proposed future land use and zoning designations for the expansion area don’t guarantee any specific industry will locate there (except that it will be a permitted use in the

zone). Having sufficient land supply in the area is important to attract viable economic development opportunities to Winlock.

- 5.3 The County and cities should designate adequate land within the UGAs to provide for future industrial and commercial needs.

Winlock has a deficit of commercial and industrial (employment generating) zoned lands to meet its population allocation.

- 5.8 Lewis County should encourage commercial/industrial development along major transportation corridors and where the potential for expansion of water and sewer development exists consistent with the County Comprehensive Plan and state regulations.

The proposed expansion area is located along the I-5 corridor and water and sewer utilities can be extended to serve the area once it's in the UGA.

11. **Citizen Participation and Coordination.** Encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts.

A draft copy of this report was made public in advance of a duly noticed public hearing held on March 28, 2022. Public comments have been summarized within this report.

12. **Public Facilities and Services.** Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.

This report has analyzed public facilities and services to ensure they can be provided within the 20-year planning horizon.

- 12.3 The financing for system improvements to public facilities to serve new development may provide for a balance between impacts fees and other sources of public funds.

New development in the expanded UGA would be required to extend utilities and related services as necessary to serve their development. As mentioned in preceding sections of this report, the city does not anticipate public funds are needed to support the utilities required to serve future private development in the expansion area.

- 12.4 New development shall pay for or provide for its share of new infrastructure through fees or as mitigation measures.

Winlock is presently working on development impact fees consistent with RCW Chapter 82.02.

13. **Historic Preservation.** Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance to Lewis County.

No archeological or historic features were identified in a search of the expansion area within DAHP's WISAARD application. However, the area (like much of Lewis County) has the potential for archeological finds. Typically, new projects in these areas are required to have an inadvertent discovery plan (IDP) or complete a cultural resources report prior to development approval.

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LEWIS COUNTY COMPREHENSIVE PLAN

Page IN-3 identifies the desire of the county to locate employment near major transportation infrastructure.

The proposed expansion area is located at the interchange of I-5 and SR 505. It fulfills this intention.

ED GOAL 2.0 | Promote a diverse range of jobs in a variety of sectors.

Winlock's existing park is being developed to encourage a variety of sectors. The proposed expansion area would promote both commercial and industrial jobs within those uses permitted and conditionally permitted within the city's zoning code.

POLICY ED 2.1 Strive to create jobs in sectors such as industry, tourism, recreation, agriculture, natural resources, and retailing.

The proposed expansion area would add needed land supply to overcome a current deficit. Further, expansion in this area will support industry, retailing and tourism sectors.

POLICY ED 2.2 Target business sectors that provide family wage jobs and match the skills mix of the existing workforce.

Per page ED-5, the target sectors of manufacturing, transportation and warehousing businesses provide some of the highest wages in Lewis County.

POLICY ED 2.3 Target basic industry sectors that export their goods and services outside the county and attract new dollars into the community.

The expansion area would have approximately 53 acres of industrially designated and zoned land which could attract industry sectors that export goods and services outside the county.

ED GOAL 3.0 | Target certain industry sectors as high priorities for economic development.

The proposed expansion will continue to ensure that Winlock (and Lewis County) have sufficient locations for industrial development in the succeeding 20-year period.

URBAN GOAL 1.0 | Designate urban growth areas based on the standards of the Growth Management Act.

This proposed expansion area is consistent with the standards of the Growth Management Act and also with the intent of the county having established urban reserve areas.

POLICY URBAN 1.1 Classify and size urban growth areas based on RCW 36.70A.110.

The analysis in this report supports the proposed expansion as meeting the classification and sizing criteria in RCW 36.70A.110. The report's analysis finds that Winlock has a deficit of employment generating lands within its UGA for the succeeding 20-year period.

POLICY URBAN 1.2 Ensure that sufficient area is included in urban growth areas to accommodate the county's adopted 20-year population forecast, to allow for market choice and location preferences, and to provide for economic development opportunities.

This report includes a land capacity analysis of the Winlock UGA, which analysis considers market choices and location preferences for economic development.

POLICY URBAN 1.3 Confirm that the location and size of urban growth areas match the capability of the affected community to serve the areas with urban levels of governmental services.

This report has highlighted the capital facilities and services needed to serve new development in the proposed expansion area. The report's analysis determines that the location of this urban growth would not be out of balance with the community's ability to serve the area with urban levels of government services.

URBAN GOAL 2.0 | Focus development in urban growth areas.

GMA says to focus urban growth in urban areas first. That is being done. However, in accordance with the county's urban reserve area policies and the land capacity analysis completed in this report, the proposed expansion is consistent with GMA.

POLICY URBAN 2.1 Accommodate more intense types of commercial, industrial, and residential land use, and their associated public facilities in urban growth areas.

The proposed expansion would incorporate more intense types of commercial, industrial, and residential land use, and their associated public facilities, inside an urban growth area as contemplated by the urban reserve policies. This will relieve pressures to convert rural and resource lands further outside the boundary from being inappropriately converted.

POLICY URBAN 2.2 Locate intensive development where adequate public services and facilities are present, or can be provided concurrently with development.

This report shows that public services and facilities can be provided to the expansion area concurrent with development (or as GMA provides, prior to its occupancy and use).

POLICY URBAN 3B.2 Require landscape screening for large commercial/industrial structures and outdoor storage areas to provide a visual buffer along the highways.

Winlock has required landscaping and screening for large commercial and industrial development. In fact the City requires 15% of commercial and 20% of industrial areas to be set aside in open space and landscaping.

OBJECTIVE 4A – ADEQUATE SUPPLY OF COMMERCIAL LAND Provide a sufficient amount of developable commercial land in the urban growth areas of Lewis County.

The proposed expansion is supported by this report's land capacity analysis which shows that the Winlock UGA has a deficit of commercial and industrial lands to meet its established population target when taking into account the accepted jobs-to-housing ratio of the city's comprehensive plan.

POLICY URBAN 4A.1 Evaluate the extent of available commercial land as part of requests to amend urban growth areas. When necessary, encourage the consideration of a variety of options, beyond just the expansion of urban growth areas, to increase the amount of commercial land.

Winlock has commercially zoned areas, as well as mixed uses areas. However, increasing the amount of commercial uses allowed in mixed-use areas would detract from the ability to accommodate the population allocation given the context of this UGA, its location, the cost of construction, the local market conditions, and other factors. Expansion to include a portion of the urban reserve area is consistent with other policies in the comprehensive plan.

POLICY URBAN 4B.1 Encourage commercial development in areas where adequate facilities and services are available or can be provided concurrent with development.

This report includes analysis that shows adequate facilities and services can be available concurrent with development (or as GMA requires, at the time of occupancy and use).

POLICY URBAN 4B.2 Site and design new commercial developments to facilitate travel by transit, car/vanpools, pedestrians, bicyclists, and other alternative modes of transportation (where available).

Development at the interchange of SR-505 and I-5 provide the greatest opportunity to realize any transit service to employment areas within Winlock's UGA. Further, the location is well suited for uses that generate commercial and industrial traffic (including commuting employees) because of its proximity to the interchange.

URBAN GOAL 5.0 | Confirm that a sufficient amount of industrial land is available to support Lewis County's existing and traditional industrial economic base.

This report includes an analysis of the land capacity in the Winlock UGA and concludes that a deficit of employment land exists to be consistent with the 20-year population allocation.

OBJECTIVE 5A – ADEQUATE SUPPLY OF INDUSTRIAL LAND Assure an adequate supply of prime industrial sites are available to meet market demands for industrial development over the planning horizon.

This report examines the supply of existing industrial land inside the Winlock UGA and establishes that Winlock will need additional industrial land to meet market demands, as well as the city's approved population target within the 20-year plan horizon.

POLICY URBAN 5A.1 Locate sites for industrial use in areas:

- With appropriate access to arterial roadways; Yes, the location of this expansion area would add industrial land along SR 505 adjacent to its interchange with I-5.
- With existing or potential utility service; and Yes, the area has the potential to be served by utilities in the 20-year period.
- Where major environmental constraints, such as unsuitable soils, floodplains or wetlands, are minimal or able to be mitigated. Yes, the expansion area has potential environmental constraints that can be minimized and/or mitigated appropriately.

POLICY URBAN 5A.2 Ensure an adequate supply of prime industrial land is available in designated urban growth areas in accordance with the countywide planning policies.

This report shows that Winlock has an existing deficit of employment land and that an expansion is warranted consistent with countywide planning policies.

OBJECTIVE 5B – WELL PLANNED INDUSTRIAL DEVELOPMENT Encourage job-producing economic development that is well planned, attractive, and avoids significant adverse impacts.

Winlock has a well-planned and existing industrial area where new development is starting to happen quickly. Winlock, in concert with the county, have been successful in realizing attractive, job-producing economic development in this area. The proposed expansion would provide Winlock with the land capacity to be successful in the succeeding 20-year period.

POLICY URBAN 5B.1 Mitigate intensive industrial development through landscaping, screening, buffers, graduated land use intensity, and other similar techniques.

Winlock's existing development codes requires 20% of industrial sites be open space and landscaping.

POLICY URBAN 5B.2 Require new industrial areas to include common site design elements such as open space, landscaping, integrated signage and traffic control, and coordinated property management and maintenance.

Winlock's existing development code requires 20% of industrial sites be open space and landscaping. The city has additional code in effect to address signage and traffic, and requirements in place to ensure coordinated property management and maintenance.

URBAN GOAL 6.0 | Designate urban reserve area overlays in locations where future urban growth is likely. Use the approach to avoid premature land segregation and the development of uses that are potentially incompatible with, or preclude later, urban development.

The proposed expansion is in an area already within an urban reserve area overlay, which is exactly where future growth is planned to be likely. The proposed expansion area has had no development to date and including it in the urban area would ensure that urban development would not be incompatible with an existing use.

POLICY URBAN 6.1 Preserve opportunities for the future siting of large industrial, mixed use retail/commercial, or tourist-oriented uses, through the use of urban reserve area overlays.

The proposed expansion area from within the urban reserve area overlay would allow for the development of large industrial and freeway/tourist commercial uses.

POLICY URBAN 6.2 Apply urban reserve area overlays at sites well served by existing or planned transportation systems, or adjacent to an existing urban growth area.

As the proposed expansion area's inclusion in an urban reserve area overlay highlights, it is an area that is identified as being well served by existing (and planned) transportation systems. Further, it is adjacent to existing urban growth.

POLICY URBAN 6.4 Include urban reserve areas within a designated urban growth area prior to development. The designation or expansion of an urban growth area to include an urban reserve area may be initiated by the county or a city. Such applications should have the support of the city impacted by the proposed expansion and shall be adopted according to the provisions of the Lewis County Comprehensive Plan.

The City of Winlock is submitting this request to initiate inclusion of a portion of its urban reserve area overlay within the Winlock UGA to address a deficit in employment generating lands and analyzed herein.

POLICY URBAN 6.5 Ensure that future developments within urban reserve areas provide employment opportunities that offer higher wages than prevail in the community and can be developed in an environmentally sensitive manner.

The proposed commercial and industrial land use designations would attract jobs consistent with targeted industries. Manufacturing, transportation and warehousing are identified in the comprehensive plan as having higher wages than many other sectors, which means adding this area to the UGA would increase the likelihood of the UGA to support higher paying jobs.

POLICY URBAN 6.6 Support the expansion of designated urban growth areas to include urban reserve areas only if the economic development envisioned as part of this plan can and will occur, and the following circumstances exist:

- Infrastructure, including, but not limited to, urban roads, public water, and public sewer is available to serve the urban reserve area (or will be made available concurrent with the development of the area).

Yes, this report's analysis shows that urban infrastructure, including but not limited to roads, public water, sewer, etc. can be made available to the area concurrent with development (or as GMA states, prior to occupancy and use).

- Infrastructure requirements and costs for the urban reserve area are able to be supported for the uses envisioned.

Yes, large industrial and freeway commercial uses can support the cost of extending infrastructure to the site. Water, sewer and road improvements have been slowly being extended along SR 505 east from North Military Road towards the SR 505 and I-5 interchange.

- Requirements and standards to ensure appropriate economic development are in place.

Yes, the city has appropriate requirements and standards in place to ensure appropriate economic development will locate in the expansion area.

- Provisions for the avoidance or mitigation of impacts to Priority Habitats or environmentally sensitive areas are included in the proposal.

Yes, Winlock has a critical areas ordinance and other regulations in place to ensure that avoidance and mitigation are considered in conjunction with the review of future development. Future, the city, like all others, utilizes the SEPA process to thoroughly analyze projects for potential impacts to ensure appropriate conditions and mitigation is assessed.

H GOAL 2.0 | Ensure concentrations of housing units are located close to transportation, employment, shopping, and daily activities, and adequate capital facilities and utilities are present for the dwellings.

Housing is concentrated along the "spine" area along SR 505 between downtown and the freeway interchange. The proposed commercial and industrial land use designations would located future employment and shopping along the major transportation corridors serving the city of Winlock and pass-by traffic along Interstate 5.

POLICY H 2.1 Consider access to transportation and proximity to employment, shopping and community services in planning the location of new housing.

Currently Winlock residents are overwhelmingly commuting to jobs in other areas (as noted in the earlier analysis). The proposed expansion and the additional of more commercial and industrial development will help the city achieve its jobs to housing ratio, provide employment opportunities that shorten the city's residents' commutes, and provide convenient access to shopping and services.

T GOAL 4.0 | Strive to coordinate land use and transportation planning between and within different jurisdictions.

The application of the urban reserve overlay to this area was a land use strategy to preserve future urban development opportunities consistent with the city's comprehensive plan, which intends to focus employment growth near SR 505 and I-5. The city, county and state have previously been working together to coordinate planning for improvements to SR-505 westbound from I-5 and the city would expect the same coordination, planning and implementation of transportation planning as this area is added to the UGA and future development is proposed and reviewed.

POLICY T 4.1 Coordinate the plans, programs and projects of local, regional, state and federal agencies to ensure consistency between the development of land uses and the availability of transportation facilities.

SR 505 and especially I-5 are the major transportation corridors that serve Winlock and the city's comprehensive plan and urban growth area have been specifically planned around developing urban densities (housing and employment) along the SR 505 corridor and the intersect of SR 505 and I-5. The proposed expansion is consistent with this prior planning.

POLICY T 9.1 Identify transportation routes and priority improvements to best serve economic development lands.

SR-505 and I-5 have been identified in the city's comprehensive plan as priority transportation corridors that serve the housing and economic development lands within its UGA. Further, the urban reserve overlay was strategic placed at the intersect of SR 505 and I-5 because it can be served by both transportation corridors. The proposed expansion and future development of this area is consistent with prior planning and can be supported by future improvements.

UCF GOAL 1.0 | Develop capital facilities and utilities in a manner that supports the implementation of the Land Use Element.

As addressed in the earlier analysis, the location of this expansion allows for logical extension of the city's capital facilities and utilities, which primary infrastructure would be required to be built or improved by future development. The proposed expansion implements the land use intent of the urban reserve overlay areas.

POLICY UCF 1.3 Acknowledge that "growth follows pipes and pavement" and install public amenities, utilities and facilities to serve as catalysts for beneficial community development.

The cities water and sewer infrastructure have been extended throughout most of its existing UGA in anticipation of development. The city expects future development to further extend these utilities as a condition of development. As such, the proximity of pipes and pavement to the proposed expansion area are consistent with the intent of transitioning urban reserve overlay areas and the expansion will serve as a catalyst for beneficial community development.

Other Strategic Considerations

The City of Winlock's industrial area is strategically located almost equidistance between the Seattle (± 105 miles north) and Portland (± 75 miles south) metropolitan market areas making it a logistically valuable location for warehousing and distribution, manufacturing, and related industries that intend to supply both markets areas.

Summary of Public Comments

The Winlock City Council held a duly noticed public hearing on this report at its March 28, 2022, regular meeting. Four members of the public attended, including Kathy Chastain, Terry Andrus, Paulette Horton, and Tim Fife. Comments provided by Chastain, Fife and Andrus related to a separate item on the Council's agenda (annexation of the existing UGA). Horton asked several questions about both the UGA expansion and annexation of the existing UGA. Specific to the proposed UGA expansion, her questions were related to the proposed zoning, the status of improvements planned on SR 505 and at SR 505 and the I-5 interchange, and the method of how utilities would be extended across Interstate 5. The mayor and members of the council answered by providing a summary of the proposed zoning in the UGA expansion area, as well as a general status update on the improvements required by the Benaroya project, which involve the addition of lanes and roundabouts along SR 505 and at the intersection of SR 505 and Interstate 5. The mayor further noted that details on the extension of infrastructure across I-5 would come a bit later in the process. After the public comments, the Council voted to submit the proposed expansion request to Lewis County.

About the Consultant

Toyer Strategic Advisors, Inc. (TSA) is a land use and economic development consulting firm based in Lake Stevens, Washington that advises public and private sector clients. TSA has successfully completed projects nationwide, including public sector engagements with the Town of Skykomish, WA; the City of Pacific, WA; the City of Spencer, IA; and the City of El Segundo, CA.

DAVID TOYER, PRINCIPAL + LEAD CONSULTANT

David is President of Toyer Strategic and has over two decades of experience in planning and zoning in the Pacific Northwest, helping companies and communities revise development codes, update subarea plans, and amend comprehensive plans to support housing needs and attract economic investment that creates jobs. He has been a Law Seminars International panelist on concurrency and impact fees, a contributor to the Washington Realtor News, recipient of the Smart Growth Program Achievement Award by the NAHB.

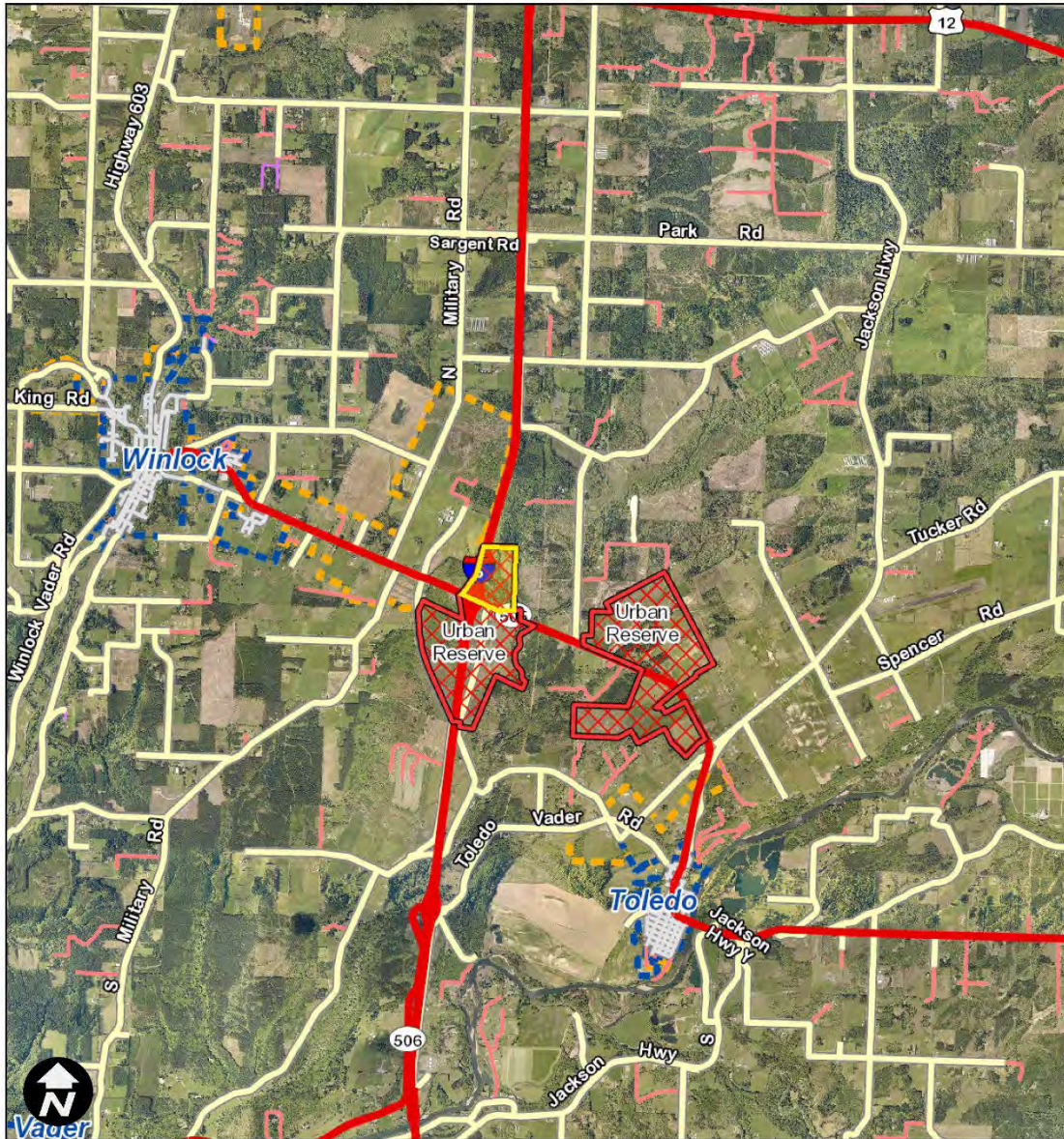
David served as an economic development recovery consultant to the City of Webster City, IA after the closure and relocation of Electrolux to Juarez, Mexico; and as Economic Development Director for the Greater Burlington Partnership, where he successfully attracted over \$200 million in new corporate capital facility investments and 700 primary sector jobs in four years, earning the community back-to-back rankings as the #1 metro along the Mississippi River for new per capita corporate facility investments.

PETER CONDYLES, SR. PROJECT MANAGER + CONTRIBUTING CONSULTANT

Peter is a graduate of Western Washington University with a degree in history. In his role as a senior project manager at Toyer Strategic, where he is primarily involved in managing annexations, comprehensive plan amendments, rezones, conditional use permits, project feasibilities, preliminary industrial site assessments, and zoning research. Outside of his duties with TSA, Peter serves as the current President of the Marysville Historical Society.

Map Exhibit 1: Proposed UGA Boundary

Proposed Winlock UGA Expansion



3/8/2022, 11:12:28 AM

1:72,224

- Urban Reserve Overlay District
- USFS
- Roads**
- State
- County
- City
- Private
- Out of County
- Other
- City Limits
- UGA

0 3,150 6,300 12,600 ft
 NAD 1983 StatePlane Washington South FIPS 4602 Feet

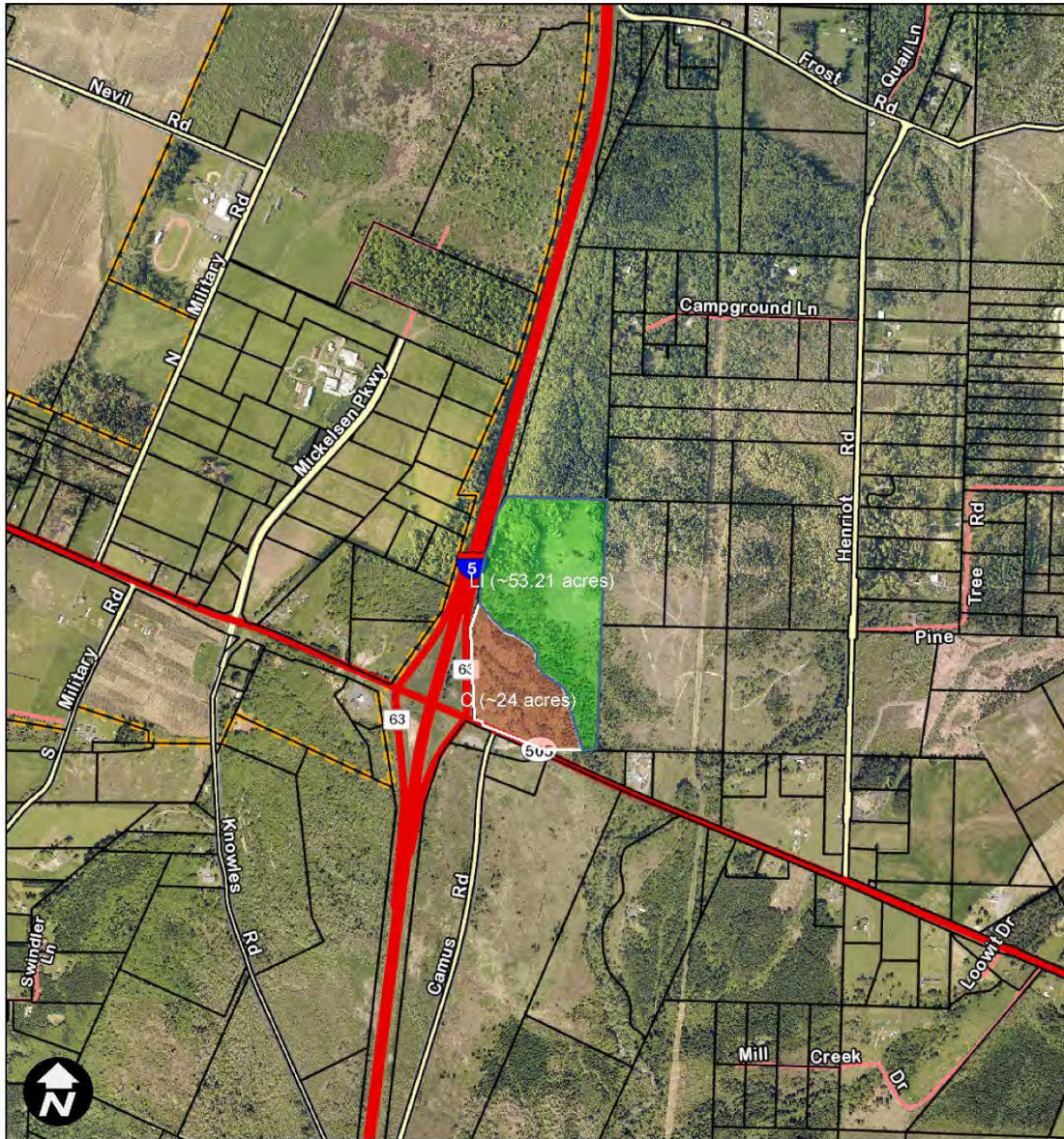


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Map Exhibit 2: Proposed Zoning Designations

Winlock UGA Expansion



11/16/2021, 4:45:42 PM

1:18,056

- | | |
|--------------|---------------|
| Parcels | Private |
| Roads | USFS |
| State | Out of County |
| County | Other |
| City | UGA |

0 800 1,600 3,200 ft
 NAD 1983 StatePlane Washington South FIPS 4602 Feet

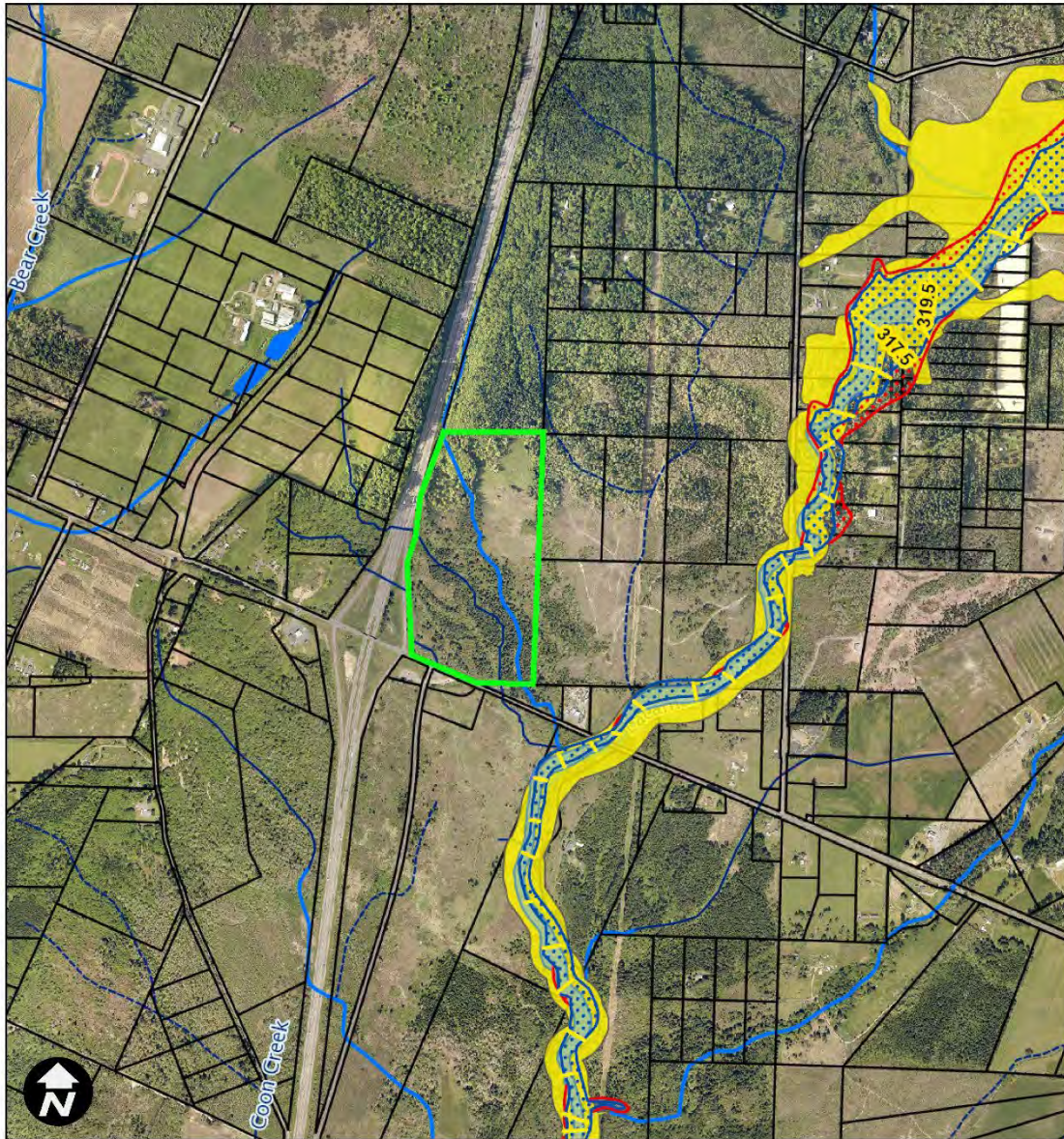


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Map Exhibit 3: Floodplain, Floodway & CMZ Map

Proximity to Floodplain, Floodway & CMZ



3/3/2022, 3:06:55 PM

1:18,056

CMZ

- Low
- Moderate
- Severe
- FEMA BFE (NAVD88)

- FEMA 100-Year
- FEMA 500-Year
- Floodway

0 800 1,600 3,200 ft
 NAD 1983 StatePlane Washington South FIPS 4602 Feet

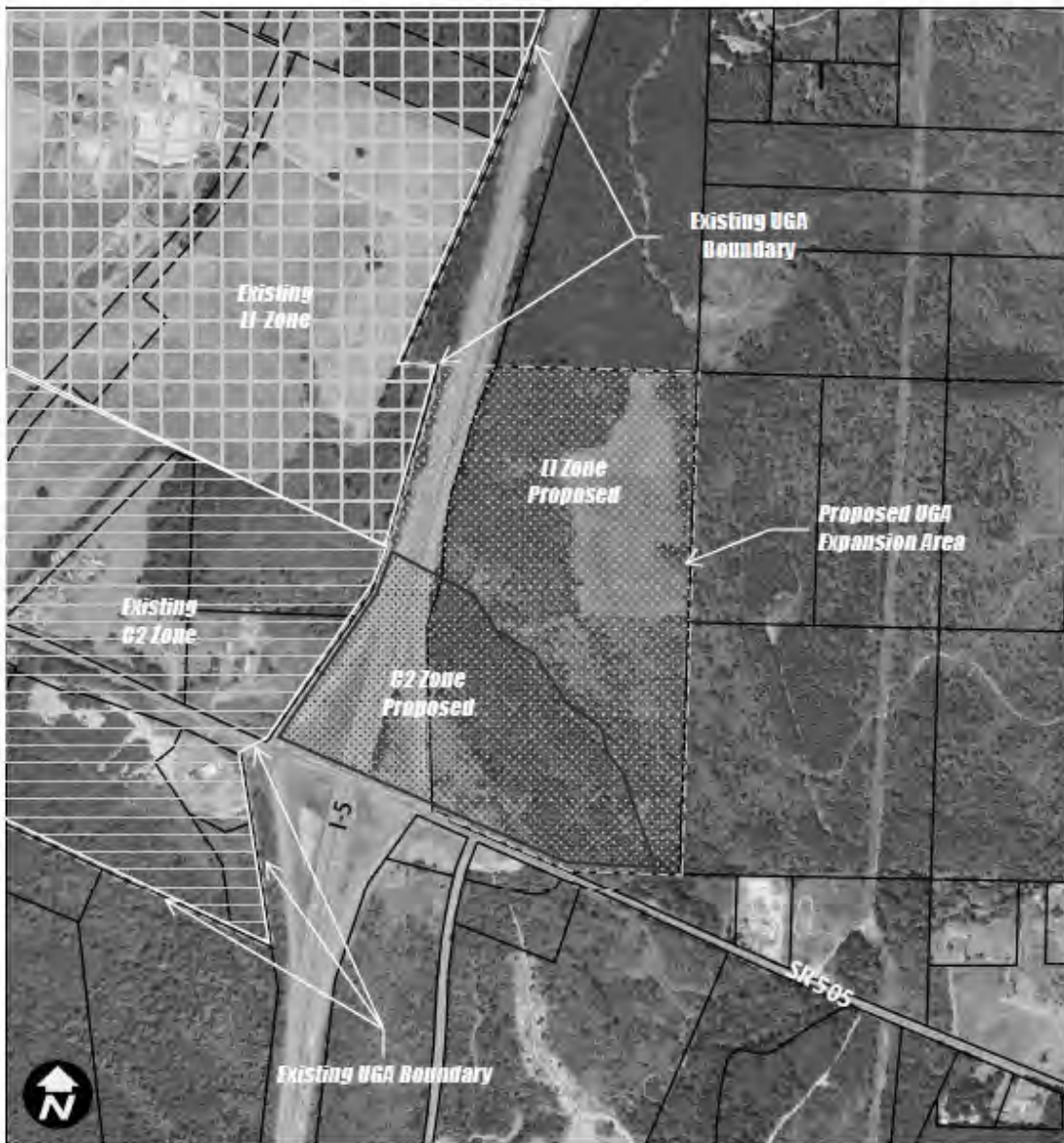


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Map Exhibit 4: Black & White UGA Expansion Map

Proposed UGA Expansion Area



3/31/2023, 7:00:38 AM

1:9,028

- Parcels
- City Limits
- UGA

0 400 800 1,600 ft
NAD 1983 StatePlane Washington South FIPS 4602 Feet



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Sources and References:

- i Winlock 2019-2025 Comprehensive Plan, Plan Synopsis, pages 1-5.
- ii December 2011 Subarea Plan, Lewis County Community Development Department & South Lewis County Subarea Plan Steering Committee
- iii RCW 36.70A.110(1)
- iv *Thurston County v. W. Wash. Growth Mgmt. Hearings Bd.*, 164 Wn.2d 329, 190 P.3d 38, 2008 Wash. LEXIS 812
- v Jobs-Housing Balance Report #516, American Planning Association *citing R. Ewing, Best Development Practices—Doing the Right Thing and Making Money at the Same Time, American Planning Association (in cooperation with the Urban Land Institute), Chicago, 1996.*
- vi Metropolitan Washington Council of Governments, <https://www.mwcog.org/newsroom/2019/10/23/how-cogs-housing-initiative-links-to-transportation/>
- vii City of Bastrop, Texas, 2016-236 Comprehensive Plan, Housing and Neighborhoods, Chapter 4, https://www.cityofbastrop.org/upload/page/0267/docs/Chap%204%20Housing_Neighborhoods.pdf
- viii <https://enviroatlas.epa.gov/enviroatlas/datafactsheets/pdf/supplemental/employmenthousingratio.pdf>
- ix Downtown Hillsboro Housing Market Assessment, ECONorthwest, July 2021, <https://www.hillsboro-oregon.gov/home/showdocument?id=27376&t=637709392717088961>
- x U.S. Census Bureau, 2015-2019 American Community Survey, 5 Year Estimates
- xi U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2019).
- xii Kitsap Lands Capacity Analysis Summary https://www.kitsapgov.com/dcd/Pages/Buildable_Lands_Update.aspx
- xiii <https://www.chronline.com/stories/four-new-distribution-centers-planned-for-winlock-industrial-park,284715>
- xiv This is anecdotally supported by public comments during the city's consideration of annexation of its UGA.
- xv The Snohomish County Employment Density Study from April 2007 (which has supported their on-going analysis in 2012 and beyond) established density ranges from 1 employee per 500 square feet of manufacturing to 1 employee per 1,000 square feet for wholesale, transportation, and utilities (including warehousing). It is important to note that this 2007 study identified the range of employment densities used by other jurisdictions (pages 10-14), varying varied from 300 square feet per employee to roughly 2,000. <https://snohomishcountywa.gov/DocumentCenter/View/7660/Employment-Density-Study>
- xvi The 2019 subarea plan for the Arlington-Marysville Manufacturing Industrial Center, a regionally designated MIC, anticipated the area could support 24,800 to 32,700 jobs based on employment densities ranging from 5 to 14 jobs per acre. <https://www.arlingtonwa.gov/DocumentCenter/View/1711/AMMIC-Arlington-Subarea-Plan?bidId=>
- xvii Oregon Department of Land Conservation and Development. Industrial and Other Employment Lands Analysis: Basic Guidebook. 2005 https://www.oregon.gov/lcd/Publications/goal9guidebook_2005.pdf
- xviii Pierce County September 2021 Building Lands Report, *Appendix C, Employment Density Survey*
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