



Community Development

2025 NE Kresky Avenue
Chehalis WA 98532

Date: June 30, 2023
To: Robert Webster, Director of Community Development & Planning
From: Mindy Brooks, Senior Long Range Planner
Re: RZ23-00001 – City of Winlock UGA Expansion Proposal

Lewis County recommends that the City of Winlock, and all jurisdictions, wrap UGA boundary amendments into their respective comprehensive plan periodic updates during 2023-2025. It is necessary to perform a comprehensive analysis to determine the appropriate locations for future urban growth necessary to support the 20-year population allocation. This includes evaluating the jurisdiction's ability provide urban services to the city limits and UGA, including any expansion areas; evaluating impacts to local and state transportation systems; determining the potential impacts to critical areas; and ensuring there are measures in place to reduce urban sprawl. In addition, the city's comprehensive plan and capital facilities plan should be amended through periodic update to reflect UGA expansion areas.

If the City chooses to proceed with this proposal outside of periodic update, the county's Planning Division staff have completed their initial review of the application and supporting materials and determined that there are several outstanding pieces of information, detailed below, which must be submitted before we can determine if the Growth Management Act requirements are met. In addition, environmental review and a SEPA determination will require additional details described below.

If the city would like to proceed and intends to have the proposal heard by the Board of County Commissioners (BOCC) this calendar year, all additional information **must be received by August 4, 2023**. This schedule is based on the SEPA, Planning Commission and BOCC process timelines, which occur in sequence. Receiving the information **does not guarantee** that the proposal will be heard by BOCC this calendar year. The SEPA determination could result in the need for an EIS, which would extend the timeline.

If the city would like to pause this request and wrap it into periodic update, please let the county know as soon as possible so that we can update the Planning Commission and BOCC 2023 dockets.

Below is the additional information necessary to determine if the proposal meets the GMA requirements and to proceed with environmental review.

1. Containing Urban Growth. RCW 36.70A.110(3) requires that urban growth be first located within existing city limits and UGA. WAC 365-196-310(4)(b)(iv) requires that if future growth forecasts exceed current capacities, counties and cities should first consider the potential of increasing capacity of existing urban areas through allowances for higher densities, or for additional provisions to encourage redevelopment. If counties and cities find that increasing the capacity of existing urban areas is not feasible or appropriate based on the evidence they examine, counties and cities may consider expansion of the urban growth area to meet the future growth forecast.

Please provide an analysis of alternatives considered to change zoning designations or development regulations (aka rezoning) within the existing city limits and UGA to accommodate the 20-year population and associated housing and jobs need. If rezoning within the existing city limits and UGA is not adequate to accommodate the population, please provide supporting evidence that expanding the UGA **in this location** is the most appropriate alternative for accommodating future urban growth.

2. Impacts on Transportation Infrastructure. RCW 36.70A.070(6)(ii) requires that the city's comprehensive plan estimate traffic impacts to state-owned transportation facilities resulting from land use assumptions to assist the Washington State Department of Transportation in monitoring the performance of state facilities, to plan improvements for the facilities, and to assess the impact of land-use decisions on state-owned transportation facilities. The site would be accessed from SR505. The proposal needs to include an analysis of the range of impacts new industrial and commercial development may have on the level of service of SR505 and any potential mitigation, with associated costs, that may be required. This analysis must be coordinated with WSDOT.
3. Provision of Urban Services. The city must demonstrate they can provide urban services, including municipal sewer, water, transportation and stormwater, to the UGA within the 20-year planning period. While it is appropriate to assume that a future developer will be responsible for building out infrastructure within development site, extension of urban services to the site and capacity within the system to provide adequate levels of services must be demonstrated by the jurisdiction. This must be demonstrated through amendments to the city's Capital Facilities Plan, including identification of funding sources (RCW 36.70A.070(3)). Please provide citations to the Capital Facilities Plan that provide evidence that the expansion area can be provided urban services within the 20-year planning period. Note – If another jurisdiction is expected to provide urban services, then the other jurisdiction must amend their Capital Facilities Plan and provide citations.

4. Impacts on the Fire District. The site is within Lewis County First District #2. Please provide additional information about the potential impacts of commercial and industrial development on the ability of the district to provide adequate services, including any mitigation measures that may be required. This analysis must be coordinated with LCFD2.
5. Impacts on Critical Areas. WAC 365-196-310(4)(c)(vi) states that although critical areas exist within urban areas, counties and cities should avoid expanding the urban growth areas into areas with known critical areas extending over a large area. The site is mapped entirely as hydric soils, which are a primary indicator of wetlands. A wetland determination needs to be completed to map the extent of wetlands on the site. The site also has three mapped streams – two non-fish bearing and one fish bearing. The location of these features needs to be confirmed. While it is not necessary to determine the exact level of impacts from future development, it is necessary to confirm that there are developable areas on the site that can be accessed by new transportation infrastructure necessary to support industrial and commercial development. If significant impacts to the wetlands and streams are anticipated to create and access developable areas, then mitigation options, including the costs of mitigation, should be evaluated and included in the proposal.
6. Public Engagement. The UGA expansion must be consistent with the city's comprehensive plan, including public engagement. Please provide the public engagement plan for the UGA expansion and a summary of public engagement undertaken to determine that this UGA expansion is in the community's best interest.
7. Amendments to City's Comprehensive Plan. WAC 365-196-310(4)(e)(i) requires an amendment to the land use element of the comprehensive plan and states that cities should review and update transportation, capital facilities, utilities, and housing elements to maintain consistency and show how any new areas added to the urban growth area will be provided with adequate public facilities. Please provide a copy of the city's draft comprehensive plan amendments that demonstrate consistency between the expansion area and the plan elements.