



MEMORANDUM

To: Planned Growth Committee

From: Mindy Brooks, Sr. Long Range Planner

Date: October 4, 2023

Subject: Requirements for UGA Amendments

This memo provides an overview of the information necessary for the county to find that the proposed Urban Growth Area boundary amendment conforms to the Growth Management Act. This memo does not cover all circumstances.

Because the Future Land Uses Map, which includes UGA boundaries, can be amended only once per year (RCW 36.70A.130), all UGA amendments are adopted at the same time, typically in December. If the city's UGA application (Attachment A) does not include sufficient information to find that the amendment conforms to the Growth Management Act, the proposed amendment may be delayed by one year or more. Therefore, it is important that cities begin working with the county early.

1. Demonstrated Need. RCW 36.70A.110(1) says based on the 20-year population projection, 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 20-year period. RCW 36.70A.115(1) clarifies that jurisdictions must accommodate housing and jobs to support the population and, as appropriate, medical, governmental, education, institutional, commercial and industrial facilities related to population growth.

The city's application must be based on the county-adopted population allocation, which is amended every five (5) years. The application should include an evaluation of how many people can be accommodated within the existing city limits and UGA, using the current zoning, as compared to the 20-year population allocation. This evaluation must include housing and may include jobs to serve the population. If there is insufficient land within the existing city limits and UGA to accommodate the 20-year population allocation, then there is demonstrated need.

2. 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.

The city's application should include an analysis of alternatives considered to change zoning designations (aka rezoning) or development regulations 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 the proposed location is the most appropriate alternative for accommodating future urban growth. This should include an evaluation of how many people, housing or jobs can be accommodated within the UGA expansion area.

3. 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. WAC 365-196-430(2)(e) requires level of service standards to monitor the performance of the system, to evaluate improvement strategies, and to facilitate coordination between city, county and state transportation investment programs.

The city's application should include an analysis of the impact on level-of-service of any county-owned or state-owned transportation facilities that provide primary access to the site. The city's comprehensive plan transportation element will need to be updated to reflect the plan for transportation to serve the UGA expansion area over the 20-year planning period.

4. 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) and WAC 365-196-415). Because the Capital Facilities Plan won't be updated until the UGA expansion is approved, a draft of the updates is sufficient.

5. Avoid the Floodplain. RCW 36-70A.110(8) states that expansion of an urban growth area is prohibited into the 100-year floodplain of any river or river segment except under specific circumstances described in (8)(b). It is recommended that the city avoid including the 100-year floodplain within the UGA expansion; however, if that is not possible, then the floodplain must be protected from future development and that protection must be accounted for in the evaluation of land capacity to serve the 20-year population allocations.
6. 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 city needs to identify all critical areas within the proposed UGA expansion. 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 the proposed development. Critical areas should be accounted for in the evaluation of land capacity to accommodate the 20-year population allocation.
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 lands 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.
8. Impacts on Special Purpose Districts. WAC 365-196-415(3)(a) states that providing adequate public facilities is a component of the affirmative duty created by the act for counties and cities to accommodate the growth. It is not necessary that a fire district, school district or other special purpose district be able to provide adequate public facilities at the time of UGA expansion; however, the city should coordinate with the special purpose districts to determine the anticipated impacts of future urban development on the public facilities and likely mitigation that will be necessary.
9. 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 in the proposed location is in the community's best interest.
10. Consistency with Countywide Planning Policies. Please provide a finding of fact for each of the applicable Lewis County Countywide Planning Policies. The findings should include citations to the application materials that provide supporting evidence for the finding. It is not sufficient to state that a policy is met without providing supporting evidence.