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ORDINANCE NO. 477 AMENDING WALLA WALLA COUNTY COMPREHENSIVE PLAN LAND USE MAPS LU-1 AND LU-3 AND THE COUNTY ZONING MAP TO ADD 19-ACRES (AREA 2C) TO THE COLLEGE PLACE URBAN GROWTH AREA GENERALLY LOCATED ON THE WEST SIDE OF SR-125 AND SOUTH OF THE CURRENT UGA BOUNDARY AND MAKING THREE TECHNICAL MAP AMENDMENTS AT THE REQUEST OF THE CITY OF COLLEGE PLACE; ASSIGNING THE LOW DENSITY RESIDENTIAL LAND USE DESIGNATION AND R-96 ZONING TO AREA 2C; AND DENYING PROPOSED UGA EXPANSION AREAS 2A, 2 B AND THE ESTABLISHMENT OF AN "URBAN RESERVE" (DOCKET NO. CPA17-006/REZ17-006, COLLEGE PLACE UGA APPLICATION NO. 2).

Auditor File Number(s) of document being assigned or released:

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Grantee

1. **The Public**
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Assessors Parcel Numbers

n/a

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**BOARD OF COUNTY COMMISSIONERS
WALLA WALLA COUNTY, WASHINGTON**

ORDINANCE NO. 477

AMENDING WALLA WALLA COUNTY COMPREHENSIVE PLAN LAND USE MAPS LU-1 AND LU-3 AND THE COUNTY ZONING MAP TO ADD 19-ACRES (AREA 2C) TO THE COLLEGE PLACE URBAN GROWTH AREA GENERALLY LOCATED ON THE WEST SIDE OF SR-125 AND SOUTH OF THE CURRENT UGA BOUNDARY AND MAKING THREE TECHNICAL MAP AMENDMENTS AT THE REQUEST OF THE CITY OF COLLEGE PLACE; ASSIGNING THE LOW DENSITY RESIDENTIAL LAND USE DESIGNATION AND R-96 ZONING TO AREA 2C; AND DENYING PROPOSED UGA EXPANSION AREAS 2A, 2B AND THE ESTABLISHMENT OF AN "URBAN RESERVE" (DOCKET NO. CPA17-006/REZ17-006, COLLEGE PLACE UGA APPLICATION NO. 2).

WHEREAS, Revised Code of Washington (RCW) 36.70A.130 requires that the County review and, if needed, revise its Comprehensive Plan and development regulations to ensure the plan and regulations comply with its requirements; and

WHEREAS, RCW 36.70A.470 requires that the County include a procedure for any interested person to suggest amendments to the Comprehensive Plan or development regulations, and that the amendments must be docketed and considered on at least an annual basis; and

WHEREAS, Walla Walla County Code (WWCC) Title 14 allows for applications to be accepted one time a year during a time period established by the Board of County Commissioners; and

WHEREAS, pursuant to Walla Walla County Code (WWCC) 14.10.015, the County has committed to conduct review of Urban Growth Area boundaries not more than once every five years in conjunction with review by affected cities, and no county-wide UGA (UGA) review has been conducted since the adoption of the 2007 Comprehensive Plan; and

WHEREAS, the County last reviewed the Urban Growth Area boundaries for the cities of College Place and Walla Walla in 2012-2013, when the three jurisdictions worked together to prepare a consensus methodology for conducting the County's Land Capacity Analysis (LCA), which is a critical requirement of UGA boundary review under the GMA; and

WHEREAS, pursuant to Board of County Commissioners Resolution No. 18-068 the County's Comprehensive Plan and Development Regulations 2018 Final Docket was established; and

WHEREAS, the Walla Walla County Planning Commission adopted Resolution No. 18-03 after a public hearing was held on December 5, 2018, recommending that the Board of County Commissioners approve the proposed Urban Growth Area (UGA) expansions in College Place Application No. 2, and deny the establishment of an unmapped "Urban Reserve," docket No. CPA17-006/REZ17-006; and



WHEREAS, the Board of County Commissioners adopted Resolution No. 18-303 setting a date of public hearing to consider the draft Comprehensive Plan and development regulations 2018 Periodic Update, plus four non-county UGA amendment applications including the proposal by the City of College Place; and

WHEREAS, the Board of County Commissioners held a public hearing on December 18, 2018 to consider the proposed Periodic Update and the College Place UGA amendment requests and to receive public comment pursuant to Walla Walla County Code (WWCC) 14.10.070(C)(2) and 14.15.070(C)(2); and

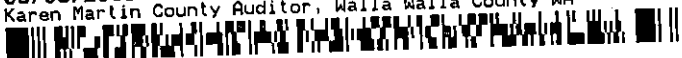
WHEREAS, the Board of County Commissioners continued the hearing to June 24, 2019.

NOW THEREFORE,

BE IT ORDAINED, by the Walla Walla County Board of County Commissioners that:

Section I. The Board of County Commissioners Makes the Following Findings of Fact:

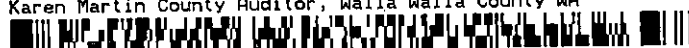
1. On October 2, 2017 pursuant to WWCC Title 14, the Board of County Commissioners established the criteria and deadline (November 30, 2017) for applications to be included on the 2018 Preliminary Docket of Comprehensive Plan and development regulations amendments.
2. On October 2, 2017 the Walla Walla County Community Development Department issued a press release notifying the public of the 2018 application cycle for non-county sponsored Comprehensive Plan and development regulations amendment applications, including urban growth area boundary amendments.
3. Throughout the 2018 Periodic Update and annual Comprehensive Plan and development regulations amendment process, Community Development staff maintained an email list of citizens and local and state agencies in order to provide meeting notification and updates on the County's update process. In addition to direct communication between County representatives and City representatives on a variety of issues, the City of College Place was also included in the email distribution list.
4. On November 30, 2017 the Walla Walla County Community Development Department received two UGA amendment applications from the City of College Place to amend Walla Walla County Comprehensive Plan Land Use Maps LU-1 and LU-3 and the County zoning map and other development regulations. Application No. 1 proposed removal of about 216-acres surrounding Martin Airfield from the UGA and the re-designation of 18-acres from Industrial to Low Density Residential. Application No. 2 proposed the addition of three areas to the College Place UGA in the vicinity of Highway 125 and Peppers Bridge Road, plus three technical map adjustments affecting only public rights-of-way. The City explained in a cover letter (Page 1) that "collectively, these two applications do not increase the size of the Urban Growth Area..." Regarding the proposed expansion areas in Application No. 2, the City explained that the City proposes on Page 2 "the reallocation of the 216 acres removed from the College Place Urban Growth Area and reallocating the development potential associated with this area to three areas along the SR125 corridor..."



5. In College Place Application No. 2 (CPA17-006/REZ17-006), the City proposed the following amendments. Exhibit C in the College Place application shows these areas on a map and Exhibit D provides legal descriptions.
 - a. The addition of about 48 acres (Area 2A) generally located between SR-125 and Peppers Bridge Road to the College Place UGA. Existing land use and zoning is Rural Residential 5 (RR-5). Proposed land use and zoning was Commercial and General Commercial.
 - b. The addition of about 91 acres (Area 2B) including the Soaring Hawk PUD located generally southeast of Peppers Bridge Road. Existing land use and zoning is Rural Residential 5 (RR-5). Proposed land use and zoning was Low Density Residential and R-96 Suburban Residential.
 - c. The addition of about 19 acres (Area 2C) located directly south of the existing College Place UGA and city limit boundaries on the west side of SR-125. Existing land use and zoning is Rural Residential 5 (RR-5). Proposed land use and zoning was Low Density Residential and R-96 Suburban Residential.
 - d. Three technical map amendments that would add sections of road rights-of-way to the College Place UGA (Mojonnier Road, 4 acres; SR-125, 7 acres; and Wallula Avenue, 2 acres).
 - e. The establishment of a 58-acre 'Unspecified Urban Reserve' to be used in the future for designating additional Light Industrial land to for the College Place UGA.
6. The City of College Place prepared a SEPA Environmental Checklist evaluating both of its applications together. This checklist is dated November 28, 2017 and it was signed on November 30, 2017.
7. In regard to expansion Area 2C, the City of College Place stated on Page 14 of its SEPA Environmental Checklist that "The 18 acres in area 2C may have limited residential development potential due to topography, but its inclusion in the UGA may increase the development potential of other properties and support the more efficient delivery of urban services." Regarding serving Area 2C with utilities, the City states that "It is anticipated that City services can readily be extended to Areas 2C in conjunction with a new mixed use development that is being planned for the recently annexed area to the north of these areas..." (Page 20).
8. In the City's November 28, 2017 SEPA Environmental Checklist, in response to Section B-9 (Page 14) on Housing, the City explained that the City estimated that proposed expansion area 2B "could potentially accommodate the construction of up to approximately 230 new single family dwellings, at 5.8 units/acre with a 25% PUD density bonus." A capacity estimate for Area 2C was not provided in the checklist.
9. The County had not completed a Land Capacity Analysis at the time that the Environmental Checklist and application was prepared. The City of College Place first provided a copy of its Land Capacity Analysis to the County in April 2018. However, the City provided land capacity estimates for the proposed UGA areas in the checklist. The assumed future density factor used by the City of College Place in its checklist (5.8) for the proposed UGA areas was equal to the average of the assumed density factors used in the County LCA for single-family residential zoning districts.

10. Section B-14 of the SEPA Environmental Checklist asks that the proponent to answer a series of questions regarding existing transportation facilities and future impacts and needs. The City of College Place did not provide specific information regarding transportation facilities that would be needed to serve the proposed UGA expansion areas. The City stated "The need for new or improvements to existing roads to serve area 1B, 2A, 2B, and 2C will be determined as project specific development proposals emerge and it is anticipated that the construction of these improvements would be conditions of approval and the cost born by the project sponsors." (Page 18).
11. In the SEPA Environmental Checklist (Page 3) prepared by the City of College Place, the applications were presented as a trade, which would not result in a net increase to the size of the College Place urban growth area: "It should be noted that Application 1 would reduce the College Place/Walla Walla Urban Growth Area by 216 acres and the additional proposed in Application 2 would increase the UGA by 158 acres. This leaves 58 acres of Urban Growth Area that the City of College Place will hold as an unspecified Urban Reserve to be applied in the future to areas suitable for industrial development that are identified in partnership with Walla Walla County."
12. In the written statement (Exhibit B, November 22, 2017) of the College Place application on Page 1, the City also presented its applications as a "series of proposed no net increase adjustments to perfect their Urban Growth Area boundaries." The City states that its application involves the "reallocation" of UGA land proposed for removal in Area 1A to be located in the expansion areas in Application No. 2. Presenting Applications No. 1 and No. 2 as a "swap" also explains why the City made the following statement: "The City is holding the remaining 58 acres removed from the College Place Urban Growth Area as an unspecified Urban Reserve that will be reallocated for Light Industrial Uses in the future in consultation with the County." However, the Martin Airfield area was, and still is, designated for light industrial use, while areas 2B and 2C were designated as additions for residential capacity. In College Place Application No. 1 (CPA17-005/REZ17-005/ZCA17-005), the City proposed to remove 216-acres (Area 1A) around Martin Field from the College Place Urban Growth Area (UGA) and re-designate an additional 18-acres (Area 1B) within the UGA from Industrial to Low Density Residential/R-96. The zoning code text amendment would establish a new zoning district for the 216-acres: 'Airport Development – Martin Field,' and associated development regulations. Exhibit C in the College Place application shows these areas on a map and Exhibit D provides legal descriptions. In Exhibit B (page 3) of the City's Comprehensive Plan applications (CPA17-005 and CPA17-006) the City responds to the UGA amendment criteria in WWCC 14.10.070(B)(5)(a) with the following statement and does not consider the population or employment projections and allocations or the land capacity analysis as required.

"The application only proposes to reallocate 216 acres removed from the College Place Urban Growth Area to locations along the SR 125 corridor in the vicinity of College Way S, where City of College Place services already exist or can reasonably be provided. As a result, there is no net increase to the size (sic) College Place Urban Growth Area..."
13. On January 3, 2018 the Walla Walla County Planning Commission reviewed the amendment applications and background materials in an open public meeting.



14. On January 17, 2018 detailed analysis was provided by the County's consultant, The Watershed Company (TWC), in a Technical Memorandum regarding population projections and allocations. A copy of this memorandum was provided to the cities. (May 28, 2019 Staff Report, Attachment A).
15. As summarized in The Watershed Company's January 17th memorandum (May 28, 2019 Staff Report, Attachment A), the current Countywide population target was originally adopted in 2005 and retained in 2013.
16. The existing Countywide target (71,724) falls between the new medium and high 20-year projections provided by the Washington State Office of Financial Management (OFM). The City of College Place population allocation, established in the 2005 Walla Walla County Comprehensive Plan (Ordinance 322), was 10,825; this allocation was retained in 2013. The 2005 population allocations for College Place, Prescott, and Waitsburg, all retained in 2013, were based on the percent of the 2004 total Countywide population estimate within each city (May 28, 2019 Staff Report, Attachment, Page 7). The percent of the Countywide population within College Place in 2004 was 15.1% and so the population allocated to College Place (10,825) was 15.1% of the County population target (71,724).
17. The percentage of the Countywide population within the cities did not significantly change between 2004 and 2017, but the percentage within College Place increased from 15.1% to 15.4%. There was not an increase in the population percentage within Prescott, Waitsburg, or Walla Walla, only College Place (May 28, 2019 Staff Report, Attachment A, Page 8, Table 9).
18. The Washington State Department of Commerce expressed support for the proposed population projection and allocations in a letter on February 15, 2018.

"The County's population projection and allocation process appears well reasoned and defensible. While the OFM medium series is the Office of Financial Management's (OFM) most likely projection, your underlying analysis for selecting a countywide growth projection and allocating growth to municipalities is logical and appropriate based on local circumstances. This is a critical step in the periodic update and, as your staff report indicates, is important in assessing capacity for new growth and considering Urban Growth Area (UGA) amendments."
19. On January 25, 2018 a Notice of Public Hearing for Planning Commission hearings was emailed to applicants and interested parties. On January 26, 2018 this notice was mailed to applicants.
20. On January 25, 2018 the Notice of Public Hearing was published in The Times (Waitsburg) and the Tri-City Herald, and on January 26, 2018 the same notice was published in the Walla Walla Union Bulletin.
21. On January 25, 2018 the Notice of Public Hearing was posted on the Community Development Department website.
22. On February 7, 2018 the City of College Place provided a letter to the County stating that the City of College Place supported the proposed College Place allocation (10,825) and would incorporate it into the City's Comprehensive Plan update. The letter also stated that in the future, not as part of the 2018 updates, the City would like to have additional discussions with the County regarding the population projections and allocations. The letter stated that "Given the complexity of and importance of these matters, we believe it



is our mutual interest to wait until we have the time for thoughtful discussions, without the pressure of a looming deadline.” The letter further stated that, in the future (after the 2018 update) “We would also like to discuss with the County and the City of Walla Walla, whether we should continue to assume that future growth allocations will maintain the *current relative proportions of population between the cities and the unincorporated county.*” (May 28, 2019 Staff Report, Attachment E, emphasis added).

23. On February 7, 2018, the Planning Commission held a public hearing regarding the population projection and allocations to be included in the County’s 2018 Periodic Update, which included a presentation of the January 17, 2018 Technical Memorandum by The Watershed Company. All four cities reviewed the recommendations in the January 17, 2018 memorandum and none submitted objections. Emails/letters from each city were presented to the Planning Commission at the hearing. There was no other public comment on the proposed population projection and allocations for 2038 at this hearing. (February 20, 2018 Staff Report, Page 2).
24. On February 7, 2018, after conducting a public hearing, the Planning Commission voted unanimously to recommend to the Board of County Commissioners that as part of the 2018 Periodic Update, the existing Countywide population target (71,724) and existing UGA allocations should be retained as the County did in 2013. (February 20, 2018 Staff Report, Page 2).
25. On February 7, 2018 the Planning Commission also held a public hearing to consider the non-County applications on the 2018 Preliminary Docket and whether they should be included on the 2018 Final Docket. Representatives of College Place presented testimony at the hearing but there were no public comments on the College Place applications (February 20, 2018 Staff Report, Page 2).
26. On February 7, 2018, after conducting the public hearing, the Planning Commission voted unanimously, with two members absent, to recommend to the Board of County Commissioners that both College Place applications be placed on the 2018 Final Docket. (February 20, 2018 Staff Report, Page 2).
27. On February 13, 2018 the Chairman of the Planning Commission signed Planning Commission Resolution 18-01, which documented the Planning Commission’s recommendations from February 7, 2018. (February 20, 2018 Staff Report, Attachment A).
28. On February 15, 2018 the Department of Commerce provided a letter to the County and the Walla Walla and College Place with comments on some of the Preliminary Docket proposals. In regard to the proposed College Place UGA expansions the letter stated:
“We concur with the County’s conclusion that a land capacity analysis is a necessary step if this item is moved to the final docket. One of the primary objectives of the periodic update is to ensure that sufficient capacity of land suitable for development is available over the twenty-year planning period to support necessary housing and employment growth, along with the other broad range of needs and uses that accompany urban growth. Completion of a land capacity analysis for the City of College Place may reveal that the initial proposal needs to be adjusted to reflect the needs to accommodate future urban growth in the City.”

29. On February 20, 2018 the Board of County Commissioners reviewed the 2018 Preliminary Docket amendment applications and the Planning Commission's recommendations, as documented in the February 20, 2018 Staff Report and Planning Commission Resolution 18-01, in an open public meeting. The Board also received the Department of Commerce February 15th letter.
30. On March 19, 2018 the Board of County Commissioners approved motions to include the applications by the City of College Place (Application No. 1 CPA17-005/ZCA17-005/REZ17-005, and Application No. 2, CPA17-006/REZ17-006) on the 2018 Final Docket.
31. On March 19, 2018 the Board of County Commissioners approved a motion to include the County's proposed 20-year population projections and allocations (CPA18-001), as described in the January 17, 2018 TWC Technical Memorandum, on the 2018 Final Docket.
32. On March 20, 2018 the Board of County Commissioners signed Resolution No. 18-068 establishing the 2018 Final Docket of Comprehensive Plan and development regulations amendment applications as decided on March 19. Beginning on April 13, 2018, the City of College Place submitted to the County ten versions of its land capacity (quantity) analysis; some of these were partial submittals. These are documented in a comparison list compiled by County staff and presented at the May 28, 2019 BOCC workshop (Attachment N).
 - a. April 13, 2018: The first version provided by the City estimated that the total population capacity within the city limits was 898; this analysis did not include any analysis of the capacity within the unincorporated UGA.
 - b. April 30, 2018: The City estimated a higher population capacity within the city limits: 967.
 - c. May 8, 2018: The City estimated the capacity within the city limits to be 1,571. This version included an estimate of residential capacity within the unincorporated UGA: 132.
 - d. May 10, 2018: The City did not present a new table with new results, but provided a draft report summarizing the City's methodology.
 - e. May 17, 2018: The City did not provide new capacity estimates but instead modified the report to show a higher population growth target, which had not been allocated by the County. The City changed their population growth projection from 1,385 to 1,587 which was based on the current percentage of population distribution (15.4%).
 - f. May 17, 2018: The City provided new results which showed that they reduced the future assumed density factor from 5 units per acre to 4 for the proposed UGA and from 6 to 5 for the existing UGA. The reduced capacity within the city limits was 1,185 and the new unincorporated UGA estimate was 115.
 - g. May 18, 2018: A new capacity estimate for the city limits was provided: 1,171.
 - h. December 14, 2018: A new copy of Table 4 (city limit capacity) was provided; results unchanged.
 - i. December 18, 2018: A new copy showing the same estimates for the existing unincorporated UGA and city limits was submitted, but the proposed UGA

calculations were modified to reflect the City's withdrawal of their Martin Field UGA removal application (CPA17-005).

- j. January 15, 2019: The existing unincorporated UGA estimate was reduced from 115 to 92. As a result of a December 28, 2018 County request, the City also provided background information regarding their modified LCA methodology.
33. With the City of College Place's April 13, 2018 Land Capacity Analysis submittal, the City provided a map titled "Existing and Proposed Urban Services" dated April 2018, which showed the location of a "funded" 12-inch water line looping project and a "preliminary sewer trunk main line route" between Area 2A and 2B as well as the new city well location. No transportation improvements were shown on this map.
34. The Watershed Company prepared a Land Capacity Analysis (LCA) for the County using a consensus methodology developed by the County in 2012 and the cities of Walla Walla and College Place. The 2012-2013 UGA review and the development of the multi-jurisdictional methodology was led by Bill Stalzer, Walla Walla County's long-term planning consultant who had worked on past County Comprehensive Plan amendments (including the 2005 Comprehensive Plan and the County's Comprehensive Plan and Development Regulation Updates in 2007 and 2008, plus a variety of long range and current planning projects.)
35. The County's Land Capacity Analysis includes a review of residential, commercial, and industrial lands within all UGAs in the County. The County's analysis estimated population and employment capacity within the existing unincorporated UGAs and within the city limits of Prescott and Waitsburg, and then incorporated capacity estimates from College Place and Walla Walla were included for their incorporated areas. A draft Land Capacity Analysis Technical Memorandum was completed by The Watershed Company on May 21, 2018; it was released alongside the Final Draft of the Comprehensive Plan Periodic Update.
36. The County's LCA summary report by The Watershed Company includes an eight-page attachment documenting in detail the methodology that was used. A few minor changes were made to the previous consensus methodology for the County's 2018 LCA. Some different (newer) datasets were used. Different GIS tools were used. The Prescott and Waitsburg UGAs, which were not reviewed in 2012-2013, were included. The methodology was not substantively changed, and for transparency, all methodology changes were tracked in the text of the document and in the endnotes.
37. The County's May 21, 2018 LCA (May 23, 2018 Staff Report, Attachment B, Page 6) concluded that the capacity within the existing College Place UGA was 1,869, more than the allocated population growth (1,385). This was based on the City's estimate for capacity within the city limits (1,171) plus the County's estimate for within the unincorporated UGA (698). As described on Pages 7-8, the County's estimate for the unincorporated UGA (698) was over five times larger than the City's (115) due to about 100 acres of land being removed from the City's available land estimate as a result of additional analysis that differed from the 2012-2013 consensus methodology used by the County.
38. On May 8, 2018 the City submitted an "Application Clarification" document (May 23, 2018 Staff Report, Attachment D) provided a "more detailed description of how each

- proposal complies with the applicable criteria in the Walla Walla County Code.” On pages 14-16 the City explains that “while there is *sufficient land in the current UGA to meet the projected population growth, there is little more than just that, certainly not enough to meet ongoing growth.*” (emphasis added) The City also stated that: “As you will note in table 4, there is *barely enough vacant land in the City to meet the projected population growth in the City over the next 20 years.* (emphasis added). There is no margin for error, and the vast majority of this land is owned by one developer, which has the potential of limiting opportunities and raising prices. As can be seen in Table 5, the addition of UGA Areas 2B and 2C will provide some additional capacity and a reasonable margin should growth occur at higher rates than projected.” The City’s statement that there is sufficient land in the UGA to meet projected population growth is consistent with the results of the County’s LCA. However, the statement that there is not enough land to meet “ongoing growth” is not clear, and it is not consistent with the requirement that counties base Urban Growth Area sizing on the amount of “urban growth projected by OFM, plus a reasonable land market supply factor.” (*Thurston County vs. Western Washington Growth Management Hearings Board, page 352 (2008).*)
39. With the City’s May 8, 2018 LCA submittal, the City provided a map titled “Southwest Area Sanitary Sewer Plan” dated April 2018, which showed the location of a “planned” water line between Area 2A and 2B as well as the new city well location. The location of the planned water line was the same as the map submitted on April 13, 2018, but the map did not have information on potential sewer improvements. No transportation improvements were shown on this map.
40. On May 18, 2018 the City submitted a memorandum from its consultant, Gregg Dohrn (May 23, 2018 Staff Report, Attachment C). In this document, in contrast to May 8 letter in which the City stated that there was “*sufficient land in the current UGA to meet the projected population growth,*” the City stated that “(W)e have revised the Land Quantity Analysis for the City of College Place and the Proposed College Place Urban Growth Area . . . These revisions are based on a parcel by parcel analysis of the development potential of vacant and underdeveloped properties and conversations with property owners in the process of preparing development proposals. As you will note, with this updated information, it appears that with the proposed adjustments to the College Place Urban Growth Area, that there is just enough land to meet the 20-year population growth projected for the City.”
41. On May 23, 2018 the Planning Commission held a public workshop to consider the County’s draft Development Regulations amendments, the County’s draft Land Capacity Analysis and the five non-County UGA applications on the 2018 Final Docket, including both City of College Place applications. Community Development Department staff provided a summary Staff Report to the Planning Commission as well as the two new documents submitted by the City, dated May 8, 2018 and May 18, 2018.
42. On June 1, 2018 the Community Development Department issued a press release notifying the public of public outreach meetings scheduled for June 19, 2018 at the Walla Walla Regional Airport and June 20, 2018 in Burbank at Columbia Middle School.
43. On June 4, 2018 the Board of County Commissioners held a public workshop on the five non-County UGA applications on the Final Docket and various components of the 2018

- Periodic Update, specifically the draft LCA, and draft development regulations amendments.
44. On June 6, 2018 the Planning Commission reviewed the applications, along with the other items on the 2018 Final Docket and the County's Periodic Update, in a workshop meeting.
 45. Community Development Department staff along with Public Works staff and the County's consultant team from The Watershed Company and Creative Community Solutions held public outreach meetings on June 19 and June 20, 2018 at the Walla Walla Regional Airport and in Burbank respectively. According to the sign-in sheets, 20 citizens attended the Walla Walla open house and 60 citizens attended the Burbank open house. Both of these open houses followed the same general format. Each open house began with a presentation by County staff and the consultants. The presentation covered the draft Periodic Update as well as the non-County UGA amendment applications. Staff then answered questions from attendees as a group. After the group portion of the meeting, attendees were able to speak individually with County staff members and the consultants.
 46. On June 19, 2018 copies of the proposed College Place amendments were sent to the Department of Commerce (Material ID# 25027) to begin the required 60-day review period.
 47. On June 19, 2018 the Department of Commerce sent a letter to Walla Walla County acknowledging receipt of the proposed amendment. The Department did not provide comments in this letter.
 48. On July 12, 2018 City of College Place Mayor Harvey Crowder submitted a letter with comments on the draft 2018 Periodic Update. The City commented on a few different topics: recommended the addition of policies to the land use chapter regarding the future designation of industrial lands (related to the City of College Place UGA amendment proposals); explained that although they had previously supported the proposed population allocations (February 7, 2018 letter), the City now recommended that the population projection should be re-allocated based on the existing proportion of population within the cities; recommended future discussions and amendments related to UGA population allocations and development standards; opposed both proposed UGA residential density waiver amendment options because of an overall opposition to a density waiver; and, lastly, proposed a policy that was intended to encourage the County to take action to eliminate the unincorporated pockets in the College Place UGA by requiring the County to improve infrastructure to "urban" standards, engage in revenue sharing with the City, and transfer stormwater management fees collected by the County from unincorporated areas to the City.
 49. On September 25, 2018 the Community Development Department received a letter from the Washington State Department of Commerce acknowledging completion of its review of the College Place applications, the County's Periodic Update and the other items on the 2018 Final Docket. This letter states that Commerce did not have specific concerns regarding the College Place application except regarding the "Unspecified Urban Reserve."

50. On November 16, 2018 a Notice of Public Hearing was published on the Community Development Department website and sent by email to the applicant and other interested parties.
51. On November 16, 2018 Walla Walla County completed a SEPA (State Environmental Policy Act) Environmental Checklist for the 2018 Comprehensive Plan and Development Regulations Periodic Update and the four non-County amendment applications remaining on the Final Docket.
52. On November 21, 2018 a SEPA Determination of Non-Significance was issued by the County's SEPA Responsible Official, the Community Development Department Director (Files SEPA 18-028, SEPA17-028, SEPA17-029, SEPA17-030, SEPA17-032). This threshold determination was filed with the Department of Ecology; emailed to consulting local, state, and federal agencies; mailed to parties of record and the applicant, and published in the Walla Walla Union Bulletin, Tri-City Herald, and The Times (Waitsburg); and posted on the Community Development Department website. The SEPA DNS was appealed by the Martin Airfield Coalition on December 5, 2018. After the City of College Place withdrew Application No. 1, the request to remove Martin Airfield from the UGA, the parties reached an agreement which resulted in the Coalition's withdrawal of their appeal and, finally, dismissal by the Board of County Commissioners with a stipulation that until and unless conditions change materially, the County has no intention of pursuing the goal of removing the property from the UGA within the next five years. (Order Signed January 22, 2019).
53. On November 21, 2018 the Notice of Public Hearing for the Planning Commission hearings was mailed to parties of record, the applicant, and affected property owners.
54. On November 22, 2018 the Notice of Public Hearing was published in the Official Gazette, the Walla Walla Union Bulletin, and one paper of general circulation, The Times (Waitsburg).
55. On November 23, 2018 the Notice of Public Hearing was published in another paper of general circulation, the Tri-City Herald.
56. On December 3, 2018 the Board of County Commissioners adopted Resolution No. 18-303 setting a date of public hearing to consider the proposed Comprehensive Plan and Development Regulations Periodic Update, plus the four non-county amendment applications on the 2018 Final Docket, including the proposals by College Place.
57. On December 5, 2018 the Walla Walla County Planning Commission held a public hearing regarding College Place Application No. 1 (CPA17-005/REZ17-005/ZCA17-005) and received testimony from eight members of the public, including the current property owners and a prospective buyer, who were opposed to the proposed Martin Airfield UGA removal. College Place Mayor Harvey Crowder spoke in favor of the application.
58. On December 5, 2018 after closing the public hearing, the Planning Commission unanimously voted (with two members absent) to recommend the Board of County Commissioners deny College Place Application No. 1, docket No. CPA17-005/REZ17-005/ZCA17-005, pursuant to the criteria in 14.10.070(B)(3) and 14.15.070(B)(3).
59. On December 5, 2018 the Walla Walla County Planning Commission held a public hearing regarding College Place Application No. 2 (CPA17-006/REZ17-006) and received testimony from five members of the public opposed to the UGA expansions and

- one member of the public in favor of it, in addition to letters and emails received prior to the hearing.
60. On December 5, 2018 after closing the public hearing, the Planning Commission unanimously voted (with two members absent) to recommend the Board of County Commissioners approve the UGA expansions in College Place Application No. 2, docket No. CPA17-006/REZ17-006, without the 58-acre Urban Reserve, pursuant to the criteria in 14.10.070(B)(3) and 14.15.070(B)(3).
 61. On December 6, 2018 a Notice of Public Hearing for the BOCC hearings was published in the Walla Walla Union Bulletin, The Times (Waitsburg), and the Tri-City Herald.
 62. On December 6, 2018 the Notice of Public Hearing for the BOCC hearings was mailed to the applicants, property owners, parties of record, and other interested parties.
 63. On December 7, 2018 the Notice of Public Hearing was emailed to interested parties, including the applicants and posted on the County website.
 64. On December 18, 2018 the Board of County Commissioners held a public hearing to consider the proposals by the City of College Place, and to receive comments from the general public. The Commissioners received testimony from College Place representatives, as well as more than 15 members of the public regarding the proposed UGA expansions. The majority of the testimony was opposed the proposed UGA expansions, by a ratio of about 4 to 1. The majority of the testimony was from property owners within Areas 2A and 2B. The Board of County Commissioners voted 3-0 to continue the hearing to a later date.
 65. At the December 18, 2018 hearing the City of College Place withdrew from consideration Application No. 1 (CPA17-005/REZ17-005/ZCA17-005) via a letter from Mayor Harvey Crowder. In the letter, the City concurred with the Planning Commission's recommendation to deny the proposed 58-acre "Urban Reserve." The letter stated that "in support of Application #2, we have attached an updated version of the City's residential land quantity analysis for the remaining areas under review for inclusion in the College Place UGA (Table 5). As you will note with the withdrawal of UGA Application #1 the need for approval of Application #2 is even greater." Attached to the letter was a copy of Table 4, not Table 5, dated December 14, 2018. This table showed that the capacity within College Place city limits is 1,171, as the May 18, 2018 College Place LCA showed, but since a revised version of Table 5 was not included, no information was provided regarding the City's estimate of capacity within the existing UGA.
 66. After the December 18, 2018 public hearing, College Place provided County staff with a revised version of Table 5 from their LCA, dated December 18, 2018. This table stated that the capacity within the existing UGA was 115, the same as the May 18, 2018 College Place LCA. For the proposed UGA areas, the table showed that the capacity of Area 1B is zero, as a result of the withdrawal by College Place of that application. The City's revised Table 5 also showed different estimates of the capacity of proposed UGA areas 2B and 2C than the previous City LCA versions.
 67. After the December 18, 2018 public hearing, as documented in the May 28, 2019 Staff Report (pages 10-11), County staff and TWC began additional review and engaged in an exchange of information with College Place in an effort to ensure that the County had reviewed all available and relevant information.

68. On December 28, 2018, County staff sent a letter to the City asking for parcel data from the City's LCA as well as detailed summary of the methodology. (May 28, 2018 Staff Report, Attachment H).
69. On January 15, 2019 the City of College Place provided the parcel data requested by the County as well a copy of the Revised City LCA and background information, including aerial photographs. At this time the City requested background data from the County's May 2018 Draft LCA. (May 28, 2018 Staff Report, Attachment I).
70. On February 12, 2019 County staff sent a letter to the City providing a status update of County review. This letter explained that the TWC would have to compile a table to fulfill the City's request. (May 28, 2018 Staff Report, Attachment J)
71. On March 6, 2019, TWC provided the requested table of parcels identified in the County's May 2018 Draft LCA as vacant, underdeveloped and redevelopable. (May 28, 2018 Staff Report, Attachment K).
72. On April 4, 2019 College Place staff provided a letter and other documentation which included comments on individual parcels that were identified by County's May 2018 Draft LCA within the College Place UGA. (May 28, 2018 Staff Report, Attachment L).
73. On May 16, 2019 County staff sent a letter to the City of College Place requesting additional information regarding the College Place's assumed future density LCA factor. (May 28, 2018 Staff Report, Attachment M).
74. On May 16, 2019 TWC completed a Revised County LCA (May 28, 2018 Staff Report, Attachment O).
75. The May 16, 2019 Revised County LCA included new results in Attachment 1, which showed a reduced population capacity within the existing College Place UGA of 1,662, which is slightly higher than the City's projected population growth.
76. The May 16, 2019 Revised County LCA reflected the withdrawal by College Place of Application No. 1 (Martin Airfield).
77. The May 16, 2019 Revised County LCA provided a new commercial/industrial land estimate for the existing College Place UGA because County staff and TWC excluded areas in the vicinity of Martin Airfield based on consultation with the Washington State Department of Transportation Aviation Division. This is shown on a map prepared by TWC (June 24, 2019 Staff Report, Attachment F).
78. In the May 16, 2019 Revised County LCA the Average Household Size factor was reduced from 2.49 to 2.36 persons (for all UGAs); 2.36 is the average household of cities in the county per the 2012-2016 American Community Survey data. This change was consistent with the 2012-2013 methodology. The revised factor used by the County (2.36) is the same as the factor used by College Place.
79. The May 16, 2019 Revised County LCA corrected an error which had miscategorized a 20.2-acre parcel in the Proposed UGA as residential instead of commercial.
80. The May 16, 2019 Revised County LCA included a detailed comparison of the 2012-2013 consensus methodology used by the County and the City's methodology (May 28, 2018 Staff Report, Attachment O). The consensus methodology does not include an assessment of "unbuildable" as a specific component.
81. The Growth Management Act (GMA) allows counties and cities to factor into their analysis a "market factor." From WAC 365-196-310(4)(b)(ii)(F): *"The purpose of the market factor is to account for the estimated percentage of developable acres contained*

within an urban growth area that, due to fluctuating market forces, is likely to remain undeveloped over the course of the twenty-year planning period. The market factor recognizes that not all developable land will be put to its maximum use because of owner preference, cost, stability, quality, and location."

82. Both the County's LCA and the City's LCA included a 25% Market Factor as required by Countywide Planning Policy 3.2 (May 28, 2019 Staff Report, Page 7).
83. Prior to 2005, the Market Factor was 50% not 25%; the Countywide Planning Policies were amended to reduce this factor in 2005. This change is explained in Ordinance 322 (Page 8; Section 1.2.10): *"Staff proposed reducing this market factor to encourage increased UGA infill development. The 25% market factor is used by many other jurisdictions to encourage infill and ensure adequate UGA sizing. Adequate sizing is particularly important in Walla Walla to minimize the sprawl of urban growth into rural areas."*
84. The Revised City LCA excluded parcels from its vacant/underdeveloped calculations based on a determination that development is "unlikely/highly unlikely." "Unlikely" is already accounted for in the Market Factor (June 24, 2019 Staff Report, Attachment D-3). The Board is concerned that the "unlikely/highly unlikely" designation by the City would amount to a "double counting" prohibited by the GMA.
85. The Revised City LCA excluded parcels within the existing UGA from its vacant/underdeveloped calculations based on a determination that there are utility constraints. This conflicts with WAC 365-196-320 which states the following in regard to the provision of urban services, "At a minimum, adequate public facilities in urban areas should include sanitary sewer systems, and public water service... because these services are usually necessary to support urban densities." (June 24, 2019 Staff Report, Attachment D-3, Page 11).
86. The May 16, 2019 Revised County LCA showed reduced results for land capacity within the existing UGA as result of review by the County of parcel-specific information provided by College Place. In this additional review, County staff reviewed notes provided by College Place, aerial photographs and other parcel information in order to determine whether the County LCA's assessment of development capacity of any of the parcels should be adjusted. The County concurred with the City of College Place for many of the parcels previously identified in the County LCA as underdeveloped, but not all. As a result, the estimated net acres available for development within the unincorporated UGA decreased substantially (by 25%). This additional analysis is documented in the May 28, 2019 Staff Report (Attachment O, Enclosure A) and it resulted in the following findings.
 - a. The County agreed with College Place recommendations exclude about 34 tax parcels from the net available land estimate for the College Place UGA. Many of these were residential parcels with homes that were identified in the 2018 Draft County LCA as "underdeveloped" because the lot area was greater than three times the minimum lot size required by zoning. Many of these parcels were less than one acre and County staff concluded that it was reasonable to agree with College Place's assessment that future development potential was limited by the existing configuration of buildings, access, or property lines, or the presence of critical areas.

- b. Approximately 12 tax parcels identified by College Place as “unbuildable” were not in the County’s LCA; no change was needed to the County LCA.
 - c. Approximately 34 tax parcels designated by the City of College Place as “unbuildable” were not excluded from the net available land estimate in the County LCA. A few of these parcels were larger lots with homes.
 - d. Approximately 78 acres was excluded from the net available commercial/industrial land estimate around Martin Airfield. This was based on consultation with the WSDOT Aviation Division and was only slightly smaller than the 84 acres excluded by the City in their analysis. While other areas around the airfield are expected to feature development limitations due to airport compatibility issues as well as critical areas, compared to other industrial lands in the County, some level of commercial and light industrial development in these other areas would be allowed.
 - e. Regarding the “recently annexed” properties, the County did not dispute that the identified parcels had been annexed, but the City LCA did not appear to have been revised to include these parcels, so they were left in the County LCA.
 - f. The City did not provide reasons for recommending exclusion of about 5 parcels from the net available land calculations, so there was no basis to remove them from the County LCA.
 - g. Three parcels were recommended by the City for exclusion from the unincorporated UGA residential capacity estimate because although they are currently zoned Multi-Family Residential, the City would designate them Commercial upon annexation. This is not appropriate because the analysis represents a snapshot in time and the County must compare “the collective effects of all development regulations operating on development,” under WAC 365-196-325. (June 24, 2019 Staff Report, Attachment B, Pages 5-6).
87. On May 24, 2019 the City of College Place provided a letter stating that the City’s assumed future density factor (5) was based on the achieved density of three recent subdivisions (June 24 Staff Report, Attachment B, Page 4). The County LCA used different density factors for each zoning district as directed by the 2012 consensus methodology. The City’s most recent assumed density factor of 5 for the existing UGA is only slightly lower than the average of the single-family residential factors used in the County LCA, which is 5.8, equal to the factor used by the City in their November 2017 SEPA Checklist.
88. On May 28, 2019 the Board of County Commissioners held a workshop meeting to discuss the proposed non-County amendments on the 2018 Final Docket and the County’s Periodic Update. Community Development Department staff and the County’s consultants presented conclusions from the Revised County Land Capacity Analysis (LCA) as well as information provided by College Place after the December 18, 2018 public hearing.
89. City of College Place representatives presented information and were asked questions by the Commissioners during the May 28, 2019 workshop. Among other issues, the Commissioners had concerns regarding annexations resulting in unincorporated islands.

90. On May 28, 2019 the Board of County Commissioners adopted Resolution No. 19-141 setting a date for the continued public hearing to consider the proposed Comprehensive Plan and Development Regulations Periodic Update, plus the four non-county amendment applications on the 2018 Final Docket, including the UGA expansions proposed by the City of College Place in Application No. 2.
91. On May 30, 2019, County staff sent an email to the City requesting background data showing how they calculated the achieved density of the three subdivisions listed in their May 24, 2019 email so it could be reviewed and considered. (June 24, 2019 Staff Report, Attachment L).
92. On May 31, 2019 a Notice of Public Hearing for the continued BOCC hearings was published on the Community Development Department website.
93. On May 31, 2019 the City of College Place provided a letter to the County responding to questions from the BOCC in the May 28, 2019 workshop meeting regarding the basis for the proposed expansion of the UGA for employment growth; this is proposed UGA Area 2A, 48-acres (June 24, 2019 Staff Report, Attachment K). This letter stated that there is not sufficient commercially-zoned land within the existing College Place UGA to accommodate employment growth for College Place.
94. The May 31, 2019 letter explains (page 2) that “both the City and County Land Quantity Analysis agree that there is arguably 6.3 acres of potentially underdeveloped land available for commercial development within the UGA.”
95. Later in the May 31, 2019 letter the City asserts that 6.3 is an overestimate and says (in bold on Page 2) that “under no standard is 3.5-acres, 4.6-acres, or even 6.3-acres of arguably underdeveloped land with houses on it a sufficient supply of property to support the population growth projected for the City of College Place over the next 20 years, or provide the additional tax revenue necessary to sustain city services.”
96. The letter appears to refer to the UGA, but excludes property within the incorporated City limits, which is part of the UGA. The letter does not account for the fact that the City’s LCA concluded that 874 jobs can be accommodated within the City on downtown and commercial lands (45 net acres available land) and that there is employment capacity in the Martin Airfield area, which will remain in the UGA, zoned Light Industrial, since the City withdrew that application (June 24, 2019 Staff Report, Attachment D).
97. Data compiled by the Washington state Employment Security Department shows that job numbers in College Place between 2005 and 2015 were relatively stable. In 2005, there were a total of 1,944 jobs; in 2010 there were 1,946; and in 2015 there were 1,948. It does appear that, despite an ebbing of the workforce in the County overall, College Place has added four jobs. (June 24, 2019 Staff Report, Attachment C: Page 4; and Attachment G).
98. The City’s adopted Comprehensive Plan shows all available vacant parcels identified in the City’s LCA in Appendix A (September 28, 2018). This map was reviewed by the Board at the June 24, 2019 hearing.
99. On June 4, 2019 County staff sent a second email to the City staff requesting background data showing how they calculated the achieved density of the three subdivisions listed in their May 24, 2019 email, so it could be reviewed and considered. (June 24, 2019 Staff Report, Attachment L).

100. On June 6, 2019 City staff and their consultant explained via phone to County staff that the City's achieved density calculations for the three subdivisions listed in their May 24, 2019 letter were calculated by dividing the gross site area by the number of units. This differs from the 2012-2013 consensus methodology, which applies the assumed density factor to the net available area, not the gross area. (June 24, 2019 Staff Report, Attachment B, Page 4).
101. On June 6, 2019 the Notice of Public Hearing for the continued BOCC hearings was published in the Walla Walla Union Bulletin, The Times (Waitsburg), and the Tri-City Herald. (June 24, 2019 Staff Report, Attachment N).
102. On June 12, 2019 the Notice of Public Hearing for the continued BOCC hearings was mailed to the applicants, property owners, parties of record, and other interested parties. (June 24, 2019 Staff Report, Attachment N).
103. On June 14, 2019 the Notice of Public Hearing for the continued BOCC hearings was emailed to the applicants and other interested parties. (June 24, 2019 Staff Report, Attachment N).
104. On June 21, 2019, one business day before the final continued June 24 hearings, the City of College Place provided a Memorandum by J-U-B Engineers, Inc., which provided cost of service estimates for four areas within the existing and proposed UGA. This memo provided utility and road cost estimates that had not previously been available and were not reviewed by County staff, the County Public Works Department or the Planning Commission. This memo provided cost information for serving the Martin Airfield area, the proposed Peppers Bridge Road/SR-125 expansion areas (2A, 2B, and 2C together, on both sides of the highway) as well as residential areas within the UGA on Wallula Avenue and at 12th and Grandview. This report showed possible sewer improvements and a roundabout on Highway 125 that were not shown on previous maps submitted by College Place. The map also labeled McMinn Road and Pepper Bridge Road as "Proposed Collector" roadways.
105. On June 24, 2019 the Board of County Commissioners continued the public hearing to hear additional testimony on the City of College Place UGA expansions in Application No. 2. In addition to presentations from multiple City of College Place representatives, about half of the public testimony received on this date was supportive of the addition of areas 2A and 2B to the UGA, and about half of the testimony was opposed to the UGA expansions 2A and 2B. No comments on the addition of Area 2C were received.
106. At the June 24, 2019 public hearing, Community Development Department staff presented the County's Final Revised Land Capacity Analysis which was prepared by The Watershed Company and presented in a Technical Memorandum dated June 14, 2019. (June 24, 2019 Staff Report, Attachment D).
107. On July 8, 2019 the Board of County Commissioners voted 2-1 to approve the proposed UGA expansion for Area 2C (19-acres) and the three technical map adjustments. The addition of Areas 2A and 2B to the UGA were denied. The Board directed staff to prepare an ordinance for approval.
108. A significant portion of the residents within Areas 2A and 2B have submitted comments desiring to remain outside the Urban Growth Area. The Board has concerns that these residents will be reluctant to annex into the City, resulting in a patchwork of unincorporated and incorporated areas, some of them zoned commercial, and presenting

challenges to road infrastructure. Peppers Bridge Road and McMinn Road are currently County roads. Peppers Bridge Road is currently designated a rural local access road north of Old Milton Highway. McMinn Road does not currently extend to Highway 125, and dead ends.

109. The areas of 2A and 2B are not already characterized by urban growth. They are rural in nature.
110. Area 2C has residential capacity for 97 as shown in the County's LCA (June 24, 2019 Staff Report, Attachment D: Attachment 1). Area 2C abuts or is close to current City limits. No testimony was received opposing the addition of Area 2C.
111. Should the City wish to annex and rezone the area, additional residential capacity exists in area 1B (18-acres), which is still in the Urban Growth Area, as presented by the City in Application No. 1.
112. Walla Walla County Code (WWCC) 14.10.015(E) allows for consideration of UGA amendments every five years and WWCC 14.10.015(G) requires UGA review at least once every ten years.
113. The Board is concerned that the existing County roads, Peppers Bridge, McMinn and Old Milton Highway, in the proposed UGA may be negatively impacted. Not enough information has been provided as to how those roads will handle the additional auto traffic, pedestrian traffic, how will the upgraded roads be funded, who will take ownership of the road and maintenance, and whether the increased traffic could create hazards to the public.
114. The Board finds that the County's Final Revised Land Capacity Analysis is credible. As noted in the County Staff report dated June 14, 2019, Attachment B, even if the County were to re-allocate a higher percentage of population to the City of College Place, the City would have surplus population capacity. The Board also notes that, early in this process, the City of College Place stated that a discussion of reallocating population could wait until the County completed its mandatory 2018 update. (Finding of Fact 22).
115. The Board has concerns regarding the different sets of analysis provided by the City of College Place described in Finding of Fact 32. College Place initially indicated that it had sufficient residential population capacity (Finding of Fact 38). The Board finds that the City of College Place has not met its burden to support the addition of Areas 2A and 2B.
116. The Board finds that the addition of Area 2C, which is estimated to support the addition of approximately 97 residents, will allow the City of College Place an additional surplus of population, without detrimentally impacting rural areas. Because portions of the property are immediately located next to current City limits, road infrastructure can be built that does not create a potential patchwork of County and City roads.

Section II. The Board of County Commissioners Makes the Following Conclusions of Law:

1. The proposed amendments have been reviewed pursuant to Walla Walla County Code Sections 14.10.070 and 14.15.070.
2. As described by the Department of Commerce in their February 15, 2018 letter, "UGA amendments are based on a variety of decisions that reflect the need to accommodate new growth, existing capacity in a UGA, strategies to accommodate growth, and costs to provide urban services."

3. The proposed addition of Area 2C to the UGA is consistent with the following Walla Walla County Comprehensive Plan land use policies and the Countywide Planning Policies. These properties are located directly south of mostly vacant commercial and residential lands within the City of College Place on the west side of Highway 125.

Countywide Planning Policy - UGA 3.5

"UGAs should be designated where: 1) infrastructure exists or is planned, as identified in an approved capital improvement program or can be reasonably and economically extended; and 2) it is environmentally appropriate for growth to occur."

Countywide Planning Policy - Contiguous and Orderly Development 5.1

"Urban growth should be located first in areas already characterized by urban growth that have existing public facility and service capacities to serve such development, and second in areas already characterized by urban growth that will be served by a combination of both existing public facilities and service and any additional needed public facilities and service that are provided by either public or private source."

Policy LU-1.4

"Encourage land use patterns that provide for the efficient use of public funds."

4. The addition of Areas 2A and 2B would not meet a definable public need or be in the long-term interest of the County. There is adequate capacity within the existing College Place UGA and Area 2C to accommodate the projected population growth. As noted in the County's LCA for the unincorporated UGA, plus the City's LCA for the city limits, there is capacity for 2,016 jobs within the College Place UGA, far more than the four added between 2005 and 2015.
5. The County's UGA designation cannot exceed the amount of land necessary to accommodate the urban growth projected by OFM, plus a reasonable land market supply factor. Adding Areas 2A and 2B, a rural area, to the UGA would encourage urban sprawl, which is prohibited by the Growth Management Act. The County's land capacity analysis and staff reports provide justification for not adding Areas 2A and 2B. The addition of Area 2C allows for a small, limited surplus. Retaining the rural designations for Areas 2A and 2B is consistent with the following goals and policies:

Countywide Planning Policy 3.2

"The retention of the overall rural character of the county and preservation of agricultural lands shall be promoted by including sufficient area within the UGA to accommodate anticipated growth and avoid market constraints that induce leapfrogging development."

Countywide Planning Policy 10.2

"Rural lands may be lands that are not suited for agricultural or forest production, but have physical or economic barriers preventing the provision of urban level services."

Countywide Planning Policy 10.4

"Rural lands often have an established land use pattern that precludes urbanization and are generally served by septic tanks and individual wells or a small community water system and are anticipated to continue as such."

Countywide Planning Policy 10.7

"The county should promote the retention of its overall character by establishing zoning classifications that preserve that rural / agrarian atmosphere."

Rural Lands Goal 1

"In Rural areas consider both human uses and the natural environment by encouraging rural development that maintains the rural character of the land and supports natural resource-based economic activities, fish and wildlife habitats, rural lifestyles, outdoor recreation, and other open space."

Rural Lands Policy RL 3.2

"Avoid extending or expanding urban public services in or to rural areas, except in those limited circumstances shown to be necessary to protect basic public health safety and the environment and when such services are financially supportable at rural densities and do not permit urban development."

Rural Lands Goal 4

"Rural lands should provide a buffer between lands designated for urban uses and resource lands."

Rural Residential 5 Goal RL-9

"Maintain a buffer between lands designated for urban use and Resource lands."

Rural Residential 5 Policy RL 9.1

"Provide a Rural Residential designation recognizing the desire of some citizens for a rural lifestyle and past development patterns that have made long-term resource use impractical. Include areas that meet one or more of the following criteria:

- 1. Areas not designated for urban growth or resource lands of long-term commercial significance and where a possibility exists for smaller farms and rural properties;*
- 2. Areas not needed during the next 20 years to provide land for population or employment and where existing and future uses do not require urban level services and facilities;*

3. *Areas that provide a buffer between resource activities and potentially incompatible land uses; or*
4. *Areas where the open space character of the land is to be protected for scenic qualities, significant cultural resources, recreational activities, and environmental functions."*
6. As presented in the December 5, 2018 Staff Report, the addition of Area 2C and the three technical map adjustments would not require amendment of policies or other areas of the comprehensive plan (WWCC 14.10.070(B)(3)(d)).
7. As presented in the December 5, 2018 Staff Report, the amendment is consistent with the Growth Management Act, and WWCC 14.10.070(B)(3)(e) which requires cities and counties planning under the act to plan for the efficient use of land and encourage development in areas where adequate public facilities and services exist or can be provided in an efficient manner ((36.70A.020(1) RCW)).
8. As presented in the December 5, 2018 Staff Report, the County considered the additional UGA amendment criteria in WWCC 14.10.070(B)(5) which requires consideration of the Land Capacity Analysis, the population and employment projections and other UGA amendments.
9. The County and the City will not have wait 20-years to conduct additional UGA review. Under WWCC 14.10.015(E), "once every five years the comprehensive plan policies and map of one or more urban growth areas may be amended." Additionally, the County must conduct a UGA review at least once every 10 years (WWCC 14.10.0125(G)). Additionally, as stated in Comprehensive Plan Policy LU 1.5, the County should "monitor the achievement of population and employment targets periodically. If targets are not met, re-evaluate the targets and underlying land use assumptions and institute corrective measures, if needed, upon consultation with affected cities."

Section III. Adoption of the Proposed Walla Walla Urban Growth Area Amendment and Amended Land Use and Zoning Maps:

Based on its review of the requirements of RCW 36.70A, the Washington Administrative Code, Walla Walla County Code and the proposed amendments, staff analysis, and the recommendation submitted by the Planning Commission, the Board of County Commissioners hereby adopts the following Comprehensive Plan and Zoning Map amendments:

The addition of approximately 19-acres to the College Place Urban Growth Area (UGA) by the adoption of amendments to Comprehensive Plan Land Use Maps LU-1 and LU-3 and applicable County zoning maps as shown on the attached maps.

The approval of three technical map adjustments for rights-of-way adjacent to the existing College Place UGA boundaries.

Pursuant to WWCC 17.06.010(B), a final Countywide official zoning map reflecting these changes will be signed by the Chair of the Board of County Commissioners.

Section IV. Denial of Proposed Urban Growth Area Expansion In Areas 2A and 2B and Denial of the Establishment of an "Urban Reserve".

Based on the foregoing Findings of Fact and Conclusions of Law, the proposed expansion of the College Place Urban Growth Area in areas 2A and 2B, and the establishment of an "Urban Reserve" are denied.

Section V. Effective Date and Savings.

This Ordinance is effective upon signing.

Section VI. Severability.

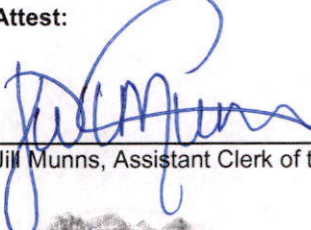
If any section, subsection, paragraph, sentence, clause or phrase of this Ordinance is declared unconstitutional or invalid for any reason, such decision shall not affect the validity of the remaining parts of this ordinance.


Section VII. Publication.

This Ordinance will be published by an approved summary consisting of the title.

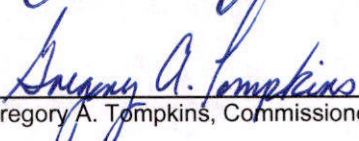
PASSED by the Walla Walla County Board of County Commissioners in regular session at Walla Walla, Washington, then signed by its membership and attested by its Clerk in authorization of such passage this 5th day of August, 2019.

Attest:


Jill Munns, Assistant Clerk of the Board


Todd L. Kimball, Chairman, District 2


James K. Johnson, Commissioner, District 1

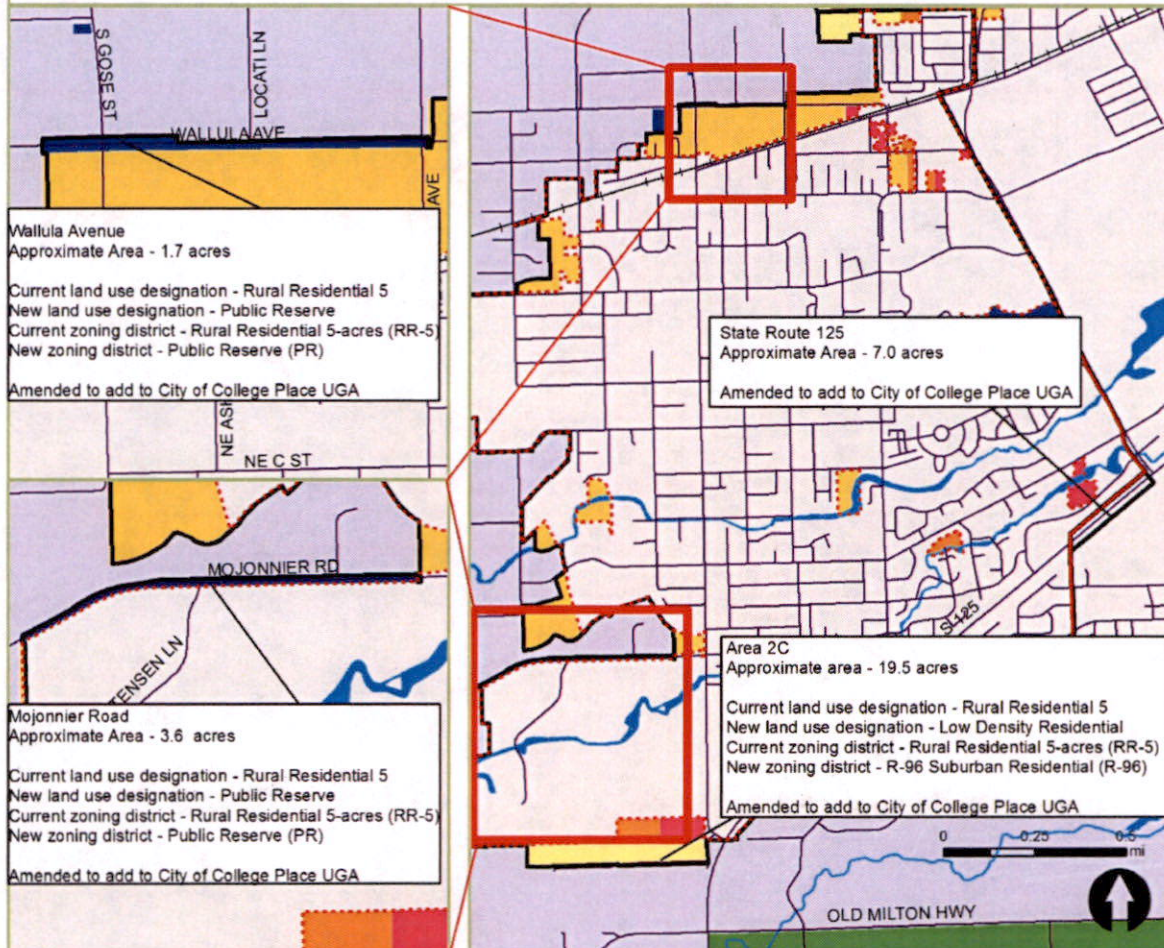

Gregory A. Tompkins, Commissioner, District 3

Constituting the Board of County Commissioners
of Walla Walla County, Washington

Approved as to form:


Jesse D. Nolte, Deputy Prosecuting Attorney

City of College Place Land Use Map Amendments (CPA17-006)



BASE MAP LAYERS

- CITY LIMITS
- INCORPORATED AREA
- URBAN GROWTH AREA
- ROADS
- + RAILROADS
- STREAMS

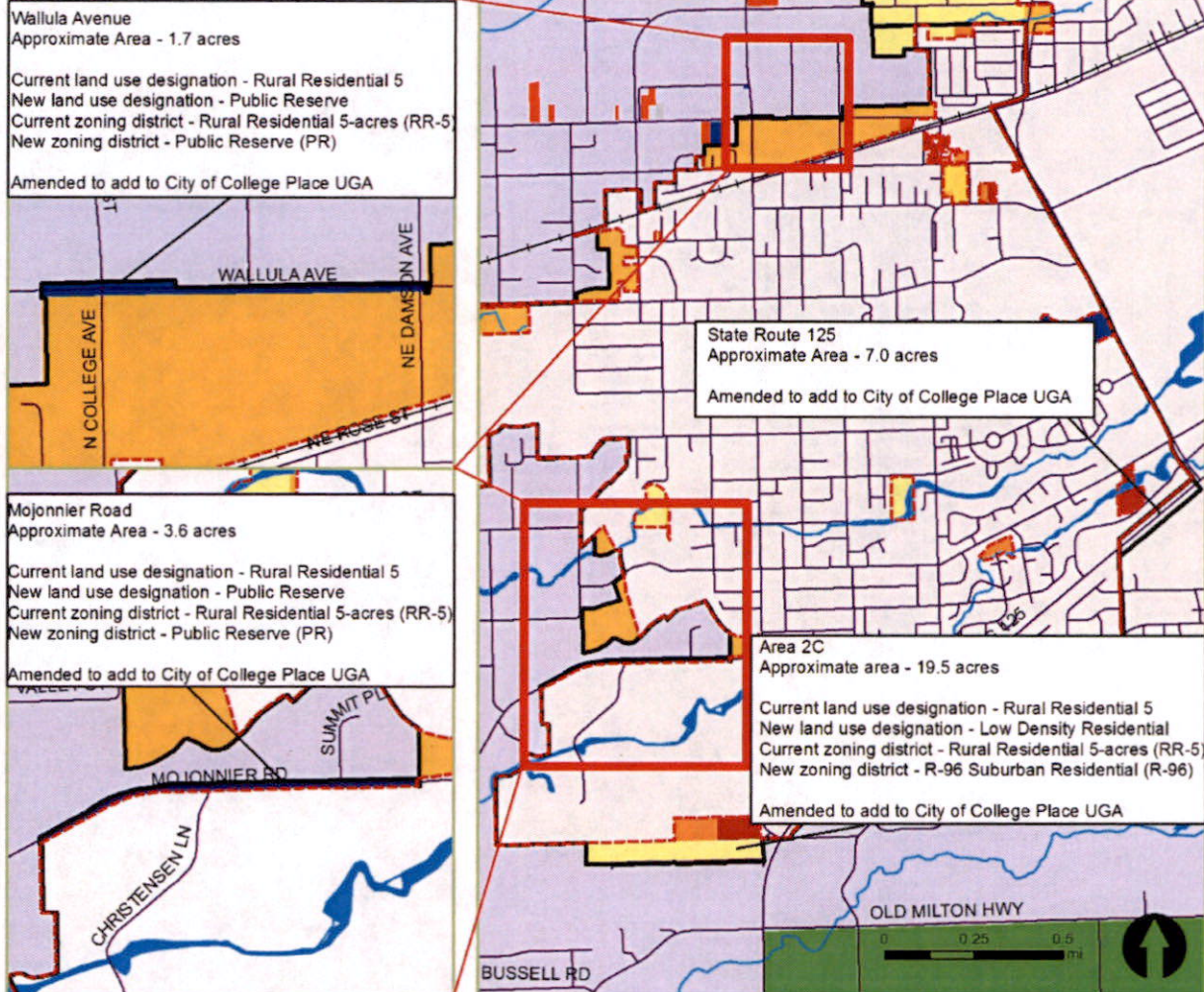
LAND USE DESIGNATIONS

- | | | |
|---|--|---|
| RESOURCE
 AGRICULTURE
 RESIDENTIAL | URBAN
 COMMERCIAL
 LOW DENSITY RESIDENTIAL
 MEDIUM DENSITY RESIDENTIAL
 MULTIPLE FAMILY RESIDENTIAL
 PUBLIC RESERVE | RURAL
 PUBLIC RESERVE
 RURAL RESIDENTIAL 5 |
|---|--|---|

Walla Walla Community Development Department - Suite 200, 310 West Poplar, Walla Walla, WA 99362 - (509) 524-2610

Print Date: 7/25/2019

City of College Place Zoning Map Amendments (REZ17-006)



BASE MAP LAYERS

- CITY LIMITS
- INCORPORATED AREA
- URBAN GROWTH AREA
- ROADS
- RAILROADS
- STREAMS

ZONING DISTRICTS

- | | | |
|---|---|--|
| AGRICULTURE | NEIGHBORHOOD | R-72 SINGLE-FAMILY |
| RESIDENTIAL 10 | COMMERCIAL | RESIDENTIAL |
| GENERAL COMMERCIAL | PUBLIC RESERVE | R-96 SUBURBAN |
| LIGHT INDUSTRIAL | R-60 SINGLE-FAMILY | RESIDENTIAL |
| MULTIPLE FAMILY | RESIDENTIAL | RURAL RESIDENTIAL 5 |
| RESIDENTIAL | | |

Walla Walla Community Development Department - Suite 200, 310 West Poplar, Walla Walla, WA 99362 - (509) 524-2610

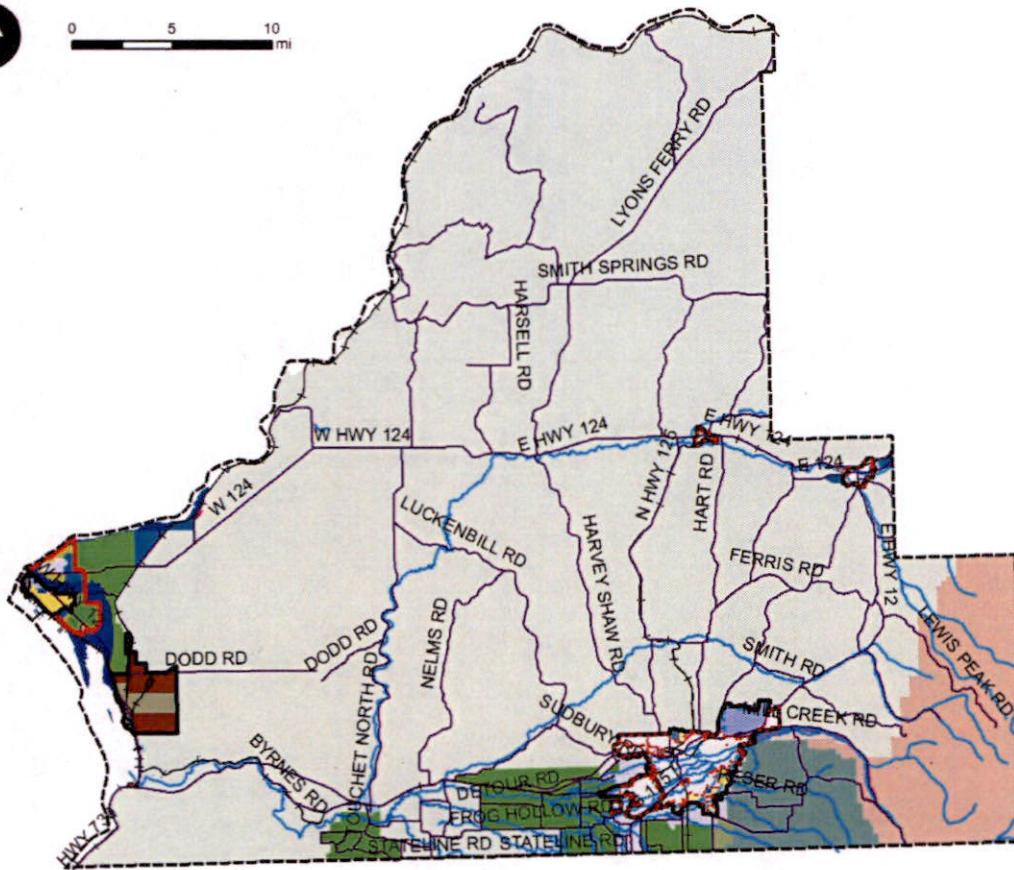
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Walla Walla County Zoning Map



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BASE MAP LAYERS

- COUNTY BOUNDARY
- CITY LIMITS
- INCORPORATED AREA
- URBAN GROWTH AREA
- BURBANK RURAL ACTIVITY CENTER
- ROADS
- RAILROADS
- STREAMS



ZONING DISTRICTS

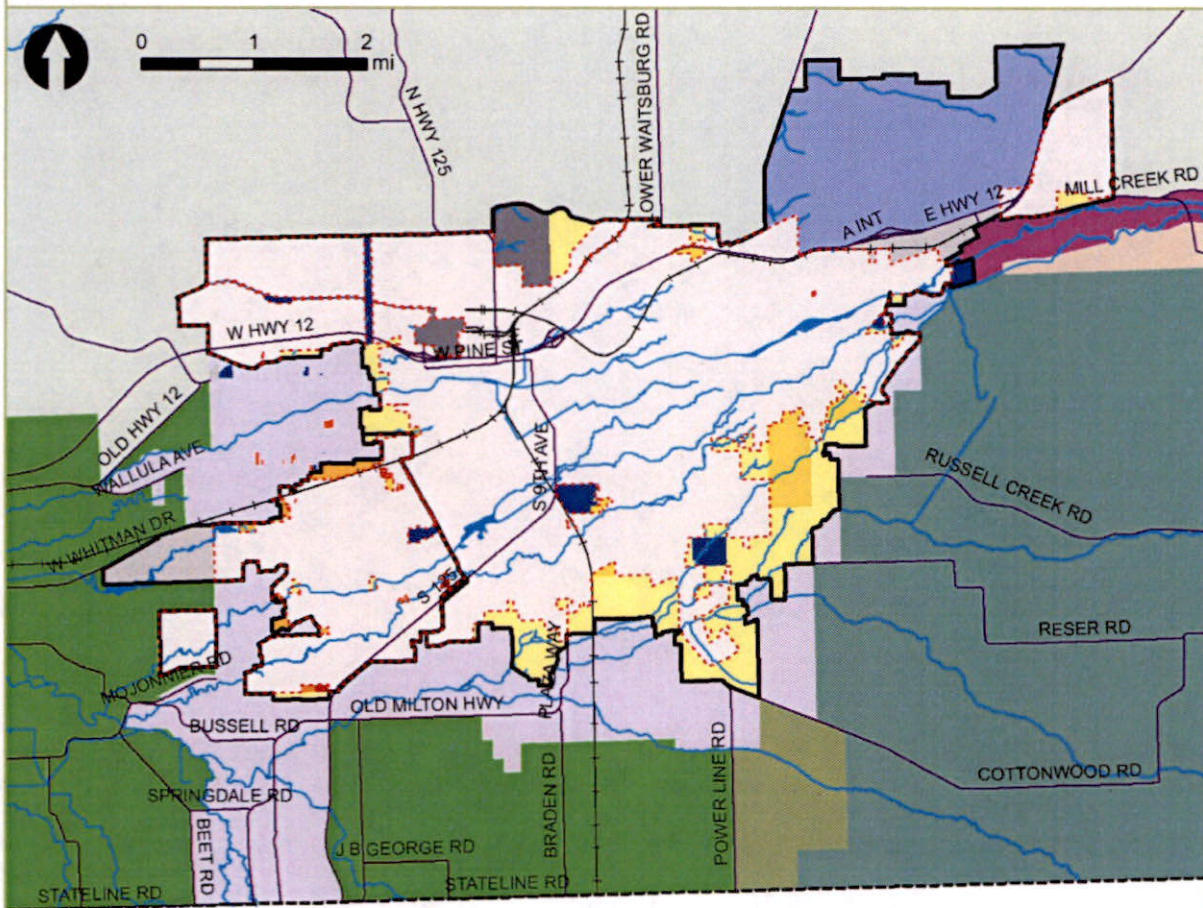
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|------------------------------|--------------------------------|---|
| AGRICULTURE RESIDENTIAL 10 | LIGHT INDUSTRIAL | RURAL DEVELOPMENT - COMMERCIAL/INDUSTRIAL |
| AIRPORT DEVELOPMENT | MULTIPLE FAMILY RESIDENTIAL | RURAL DEVELOPMENT - RESIDENTIAL |
| BURBANK COMMERCIAL | NEIGHBORHOOD COMMERCIAL | RURAL FARMWORKER COMMUNITY |
| BURBANK RESIDENTIAL | PRIMARY AGRICULTURE 40 | RURAL REMOTE 20 |
| EXCLUSIVE AGRICULTURE 120 | PUBLIC RESERVE | RURAL REMOTE 40 |
| GENERAL AGRICULTURE 20 | R-60 SINGLE-FAMILY RESIDENTIAL | RURAL RESIDENTIAL 2 |
| GENERAL COMMERCIAL | R-72 SINGLE-FAMILY RESIDENTIAL | RURAL RESIDENTIAL 5 |
| HEAVY INDUSTRIAL | R-96 SUBURBAN RESIDENTIAL | RURAL RESIDENTIAL MILL CREEK 5 |
| INDUSTRIAL AGRICULTURE HEAVY | RURAL ACTIVITY CENTER | URBAN PLANNED COMMUNITY |
| INDUSTRIAL AGRICULTURE MIXED | RURAL AGRICULTURE 10 | |
| INDUSTRIAL/BUSINESS PARK | RURAL AGRICULTURE 5 | |

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Walla Walla and College Place Area Zoning



BASE MAP LAYERS

- CITY LIMITS
- INCORPORATED AREA
- URBAN GROWTH AREA
- ROADS
- RAILROADS
- STREAMS

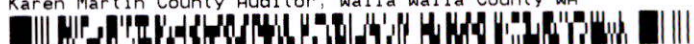


ZONING DISTRICTS

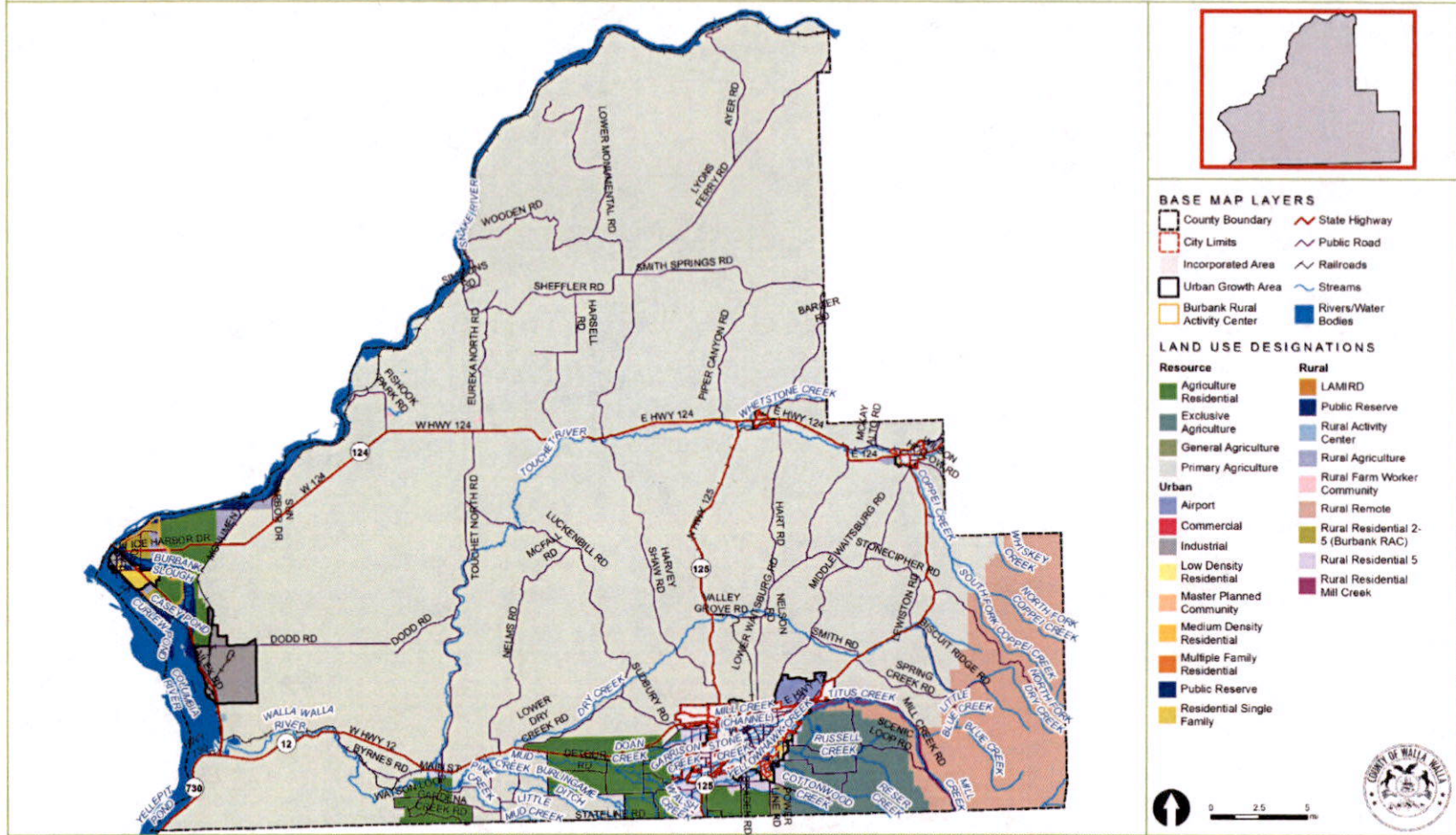
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|--|--|--|
| AGRICULTURE | MULTIPLE FAMILY | R-72 SINGLE-FAMILY |
| RESIDENTIAL 10 | RESIDENTIAL | RESIDENTIAL |
| AIRPORT DEVELOPMENT | NEIGHBORHOOD | R-96 SUBURBAN |
| EXCLUSIVE | COMMERCIAL | RESIDENTIAL |
| AGRICULTURE 120 | PRIMARY AGRICULTURE | RURAL REMOTE 20 |
| GENERAL AGRICULTURE | 40 | RURAL RESIDENTIAL 5 |
| 20 | PUBLIC RESERVE | RURAL RESIDENTIAL |
| GENERAL COMMERCIAL | R-60 SINGLE-FAMILY | MILL CREEK 5 |
| HEAVY INDUSTRIAL | RESIDENTIAL | URBAN PLANNED |
| LIGHT INDUSTRIAL | | COMMUNITY |

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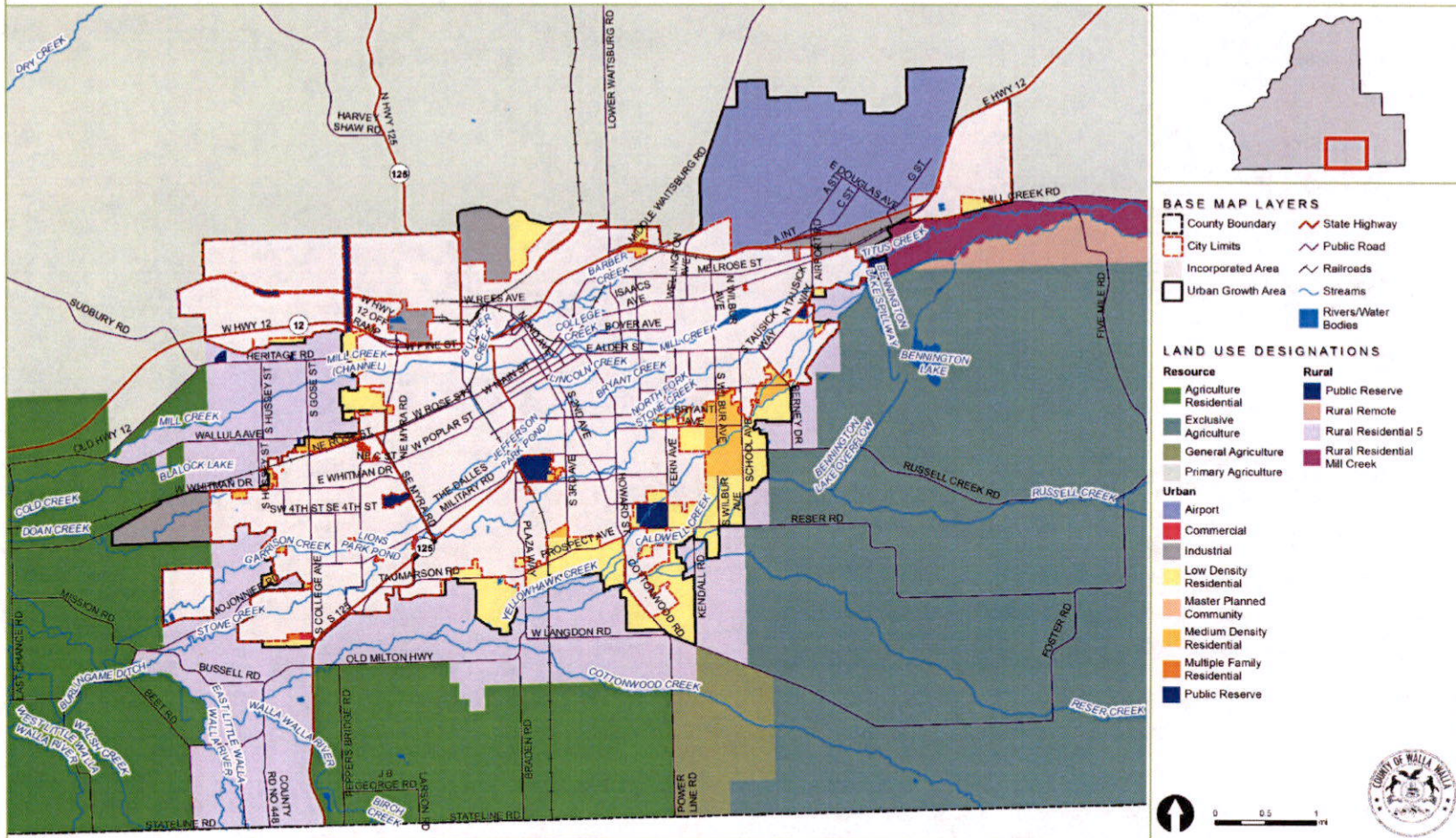


LAND USE DESIGNATIONS - Walla Walla County



2019-05819 ORD
08/06/2019 02:22:17 PM Page 28 of 29 Fees: 131.50
Karen Martin County Auditor, Walla Walla County WA

LAND USE DESIGNATIONS - College Place / Walla Walla Area



2019-05819 ORD
 08/06/2019 02:22:17 PM Page 29 of 29 Fees: 131.50
 Karen Martin County Auditor, Walla Walla County WA