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November 30, 2021

TO: Mindy Brooks, Senior Planner  
Lewis County Department of Community Development

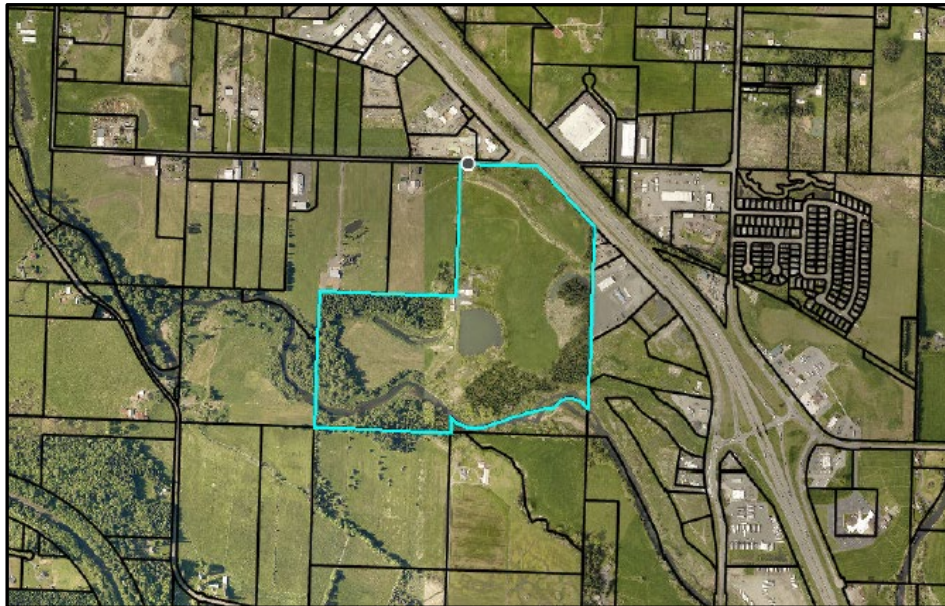
FROM: Tammy Barraconi, Building & Planning Manager  
City of Chehalis

RE: Urban Growth Area Expansion

Parcel #: 017904002002

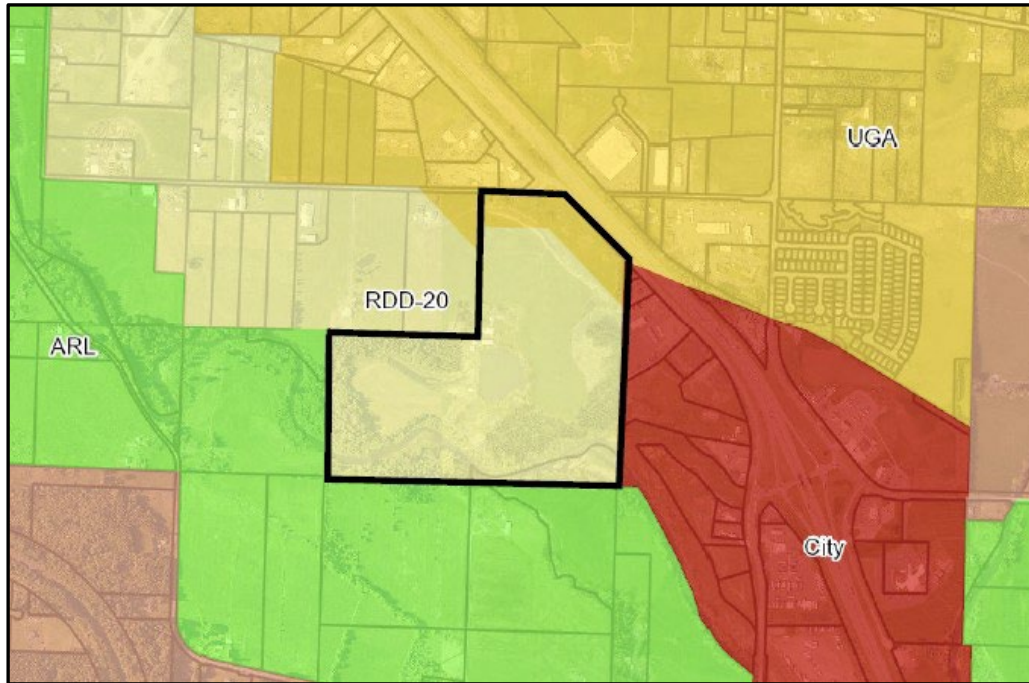
Acres: 109.8

### Proposal Area



The City of Chehalis is presenting an application for expansion of its Urban Growth Area (UGA) in support of a request by the estate of Virginia Breem. The proposed expansion area is a single parcel located at 259 Hamilton Road. The parcel has historically been agricultural and is located within Lewis County Rural Development District 1 Unit per 20 Acres (RDD-20). Access is gained from Hamilton Road, and the proposal area is in close proximity to Interstate 5, via Exit 72. A portion of the parcel – the north and northeastern parcel boundary - is already in the City of Chehalis UGA. The City of Napavine is to the east, Lewis County Agricultural Resource Lands (ARL) zone is to the south and west, and Lewis County RDD-20 zone is to the west.

## Zoning



Access to the proposal area is from Hamilton Road, which access Interstate 5 just to the south, at exit 72 in the City of Napavine. City of Chehalis sewer and water are immediately adjacent to the proposal area.

Lewis County has established an application process for UGA expansion requests. The County has developed a worksheet to guide the preparation of the application, and for an expansion request, the following items must be addressed:

**1. Map of the existing and proposed change to your city’s UGA Boundary**

Maps are included in the body of this letter of application and also as attachments.

**2. Needs assessment that explains why the change is necessary based on your city’s population allocation.**

The City of Chehalis is unusual in that the need to expand its UGA is not based upon growth within the City limits, but rather because of growth in the UGAs. Therefore, the population allocation for the City is not the best metric for understanding the need for additional UGA. The City proper is severely constrained with respect to population growth, as documented in the City’s Comprehensive Plan:

“The city of Chehalis is virtually built out. Most of the undeveloped land within the city contains significant constraints to development due to the presence of wetlands, steep slopes, or floodways. Lesser constraints, such as location within a flood plain, require more costly design than properties without such constraints. In addition, properties located in proximity to the airport may face additional restrictions to ensure that future development does not conflict with current airport uses or activities. Simply put, almost all of the most easily developable land has already been developed. While the higher densities and intensities of land uses

promoted by GMA will result in more compact development patterns, the need to expand beyond the existing corporate boundaries of the city, especially to accommodate needed economic expansion, will become clear. In other words, Chehalis will need to continue to annex additional areas in order to meet projected growth.” (Ch 3, pg. 26)

The Comprehensive Plan Land Use Element states that the City of Chehalis has a total of 3,695 acres. The 2016 Comprehensive Plan notes that 2,884 acres – or 78% - within the City are encumbered with critical areas [Ch.3, p.23]. Of the remaining 811 acres, the Comprehensive Plan indicates that only 179 acres remain available for development [Ch.3, p.26] The current revised draft of the Comprehensive Plan draws upon this information to demonstrate that the City will need at least 200 more acres of developable residential land if it is to meet is 2040 population allocation of 11,230.

2021 population data show the City’s current population to be 7,350 [OFM]. To achieve the 2040 population allocation of 11,230 will require adding 3,880 new residents. At the current average household size of 2.46 per household, the number of dwellings to accommodate future growth is 1,577. Finally, based on previous trends of residential development occurring at a rate of 69%, versus 31% for multi-family, the City will need 1,088 single-family lots and 489 multi-family dwelling units. This analysis also assumes that single-family development will occur at 4 du/acre and multi-family will occur at 12 du/acre:

1. Average density = 4 du/ac
  2. Additional lots for dwelling units needed by 2040 = 1,088
  3. Gross amount of land needed (1088/4) = 272 acres
  4. Add market factor (283.5 x 1.25) = 340 gross acres of residential land needed
  6. Land available (69% of 179 acres) =124 acres
- Residential land deficit (124 - 340) = **-216 net acres**

The same methodology, when applied to the need for land for multi-family development, yields this result:

1. Average density = 12 du/ac
2. Additional dwelling units needed by 2040 = 489
3. Gross amount of land needed (489/12) = 41 acres
4. Add market factor (42.5 x 1.25) = 51 gross acres needed
5. Land available (31% of 179 acres) = 56 acres
6. Multi-family residential land surplus (56 – 51) = +5 net acres of land

The most recent population data from the State Office of Financial Management show that the majority of population growth is occurring in the City’s UGA. The City’s population in 2010 was 7,259. As of 2021, OFM estimates the City’s population to be 7,350. This represents a growth rate of 1.25%. Also according to OFM, the City’s UGA population in 2010 was 1,918. As of 2020 it was estimated to be 2,044, which represents a growth rate of 6.57%.

City Population 2010	City Population 2021	UGA Population 2010	UGA Population 2021
7,259	7,350	1,928	2,044

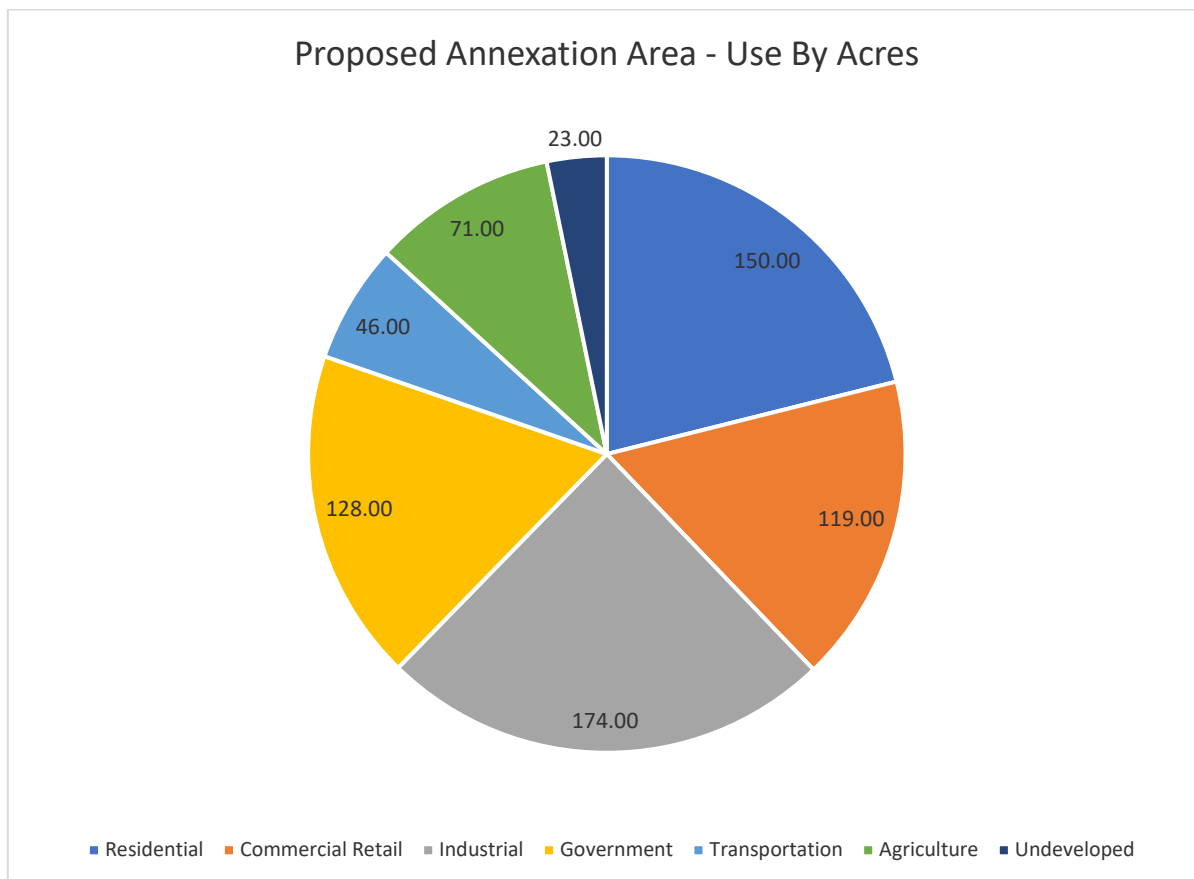
Based on the City’s current population and the growth rates discussed above, the City and UGA projected populations in 2040 will be 9,307 and 7,298, respectively:

**City and UGA Population Projections – 2040**

	Current Population	Rate of Growth	2040 Population
City of Chehalis	7,350	1.25%	9,307
Chehalis UGA	2044	6.57%	7,298

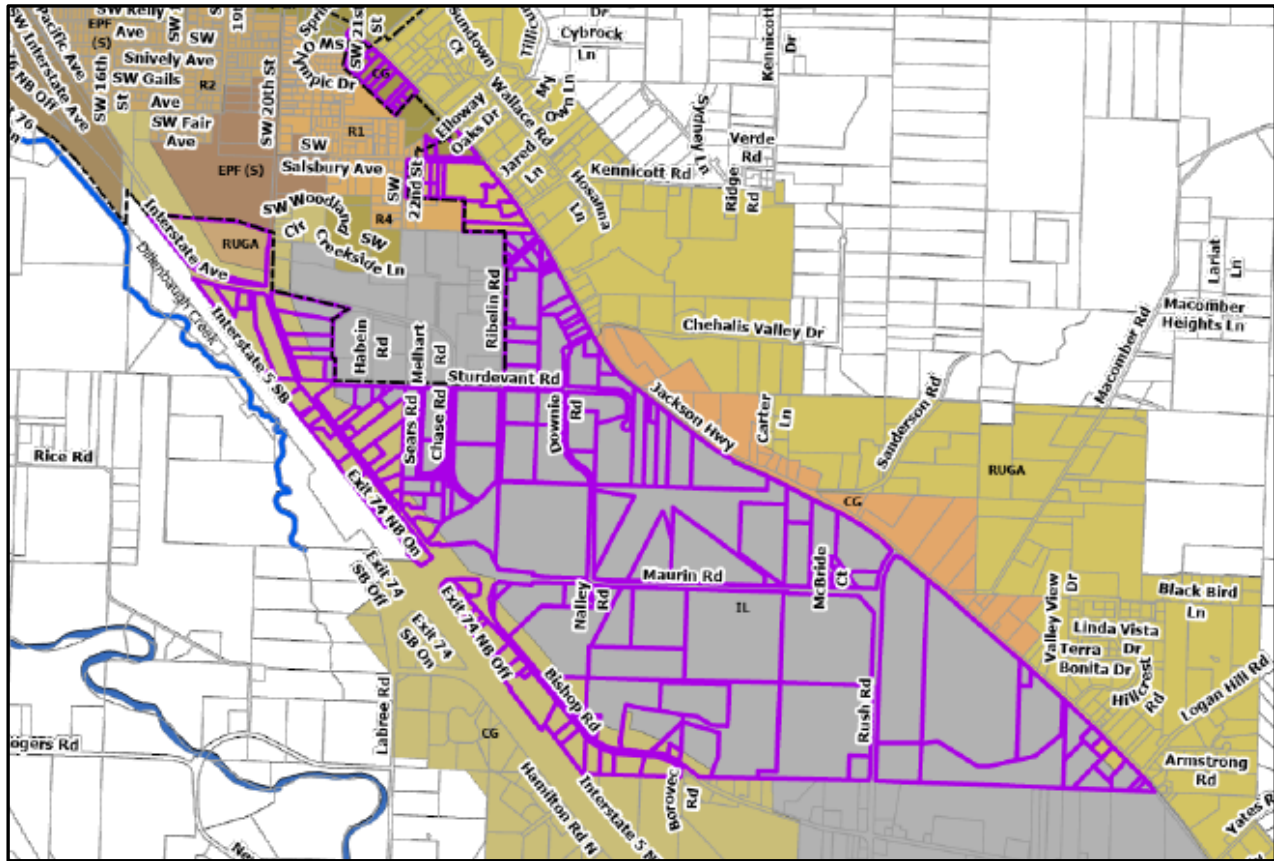
**Annexation and UGA Expansion Needs**

The first obvious mechanism to accommodate future growth and to meet the population allocation, especially when it is occurring in the UGA, is to annex some or all of the UGA into the City. This would change the population ratios between the City and the UGA. Currently, the City is in the analysis phase of completing a large portion of the UGA to the south. This area is comprised of 875 acres, which represents 29% of the UGA. Although this area represents a significant portion of the City’s UGA, at 150 acres, only a small percentage is zoned for residential use. Of this 150 acres, This is due in large part to the presence of the Port of Chehalis in this part of the UGA:





## Potential Annexation Area



A review of the Lewis County Assessor's database shows that 89 acres of available residential acreage in the UGA has already been developed, leaving at most 60 acres available, and it is not known how much of the remaining acres may be encumbered by critical areas.

Based on the above analysis, while annexation will be a *necessary* component to accommodate the City's future growth, given the current land use designations – particularly the large area devoted to the Port of Chehalis – annexation will not be *sufficient* to accommodate that growth. For this reason, UGA expansion is also warranted and necessary to provide both commercial and residential growth beyond the current southern boundary of the City's UGA. More residential development opportunities are necessary to accommodate the 6.57% growth rate in the UGA. Increased commercial and/or industrial development opportunities are warranted to keep pace with the consumer demands that will accompany residential growth in the area.

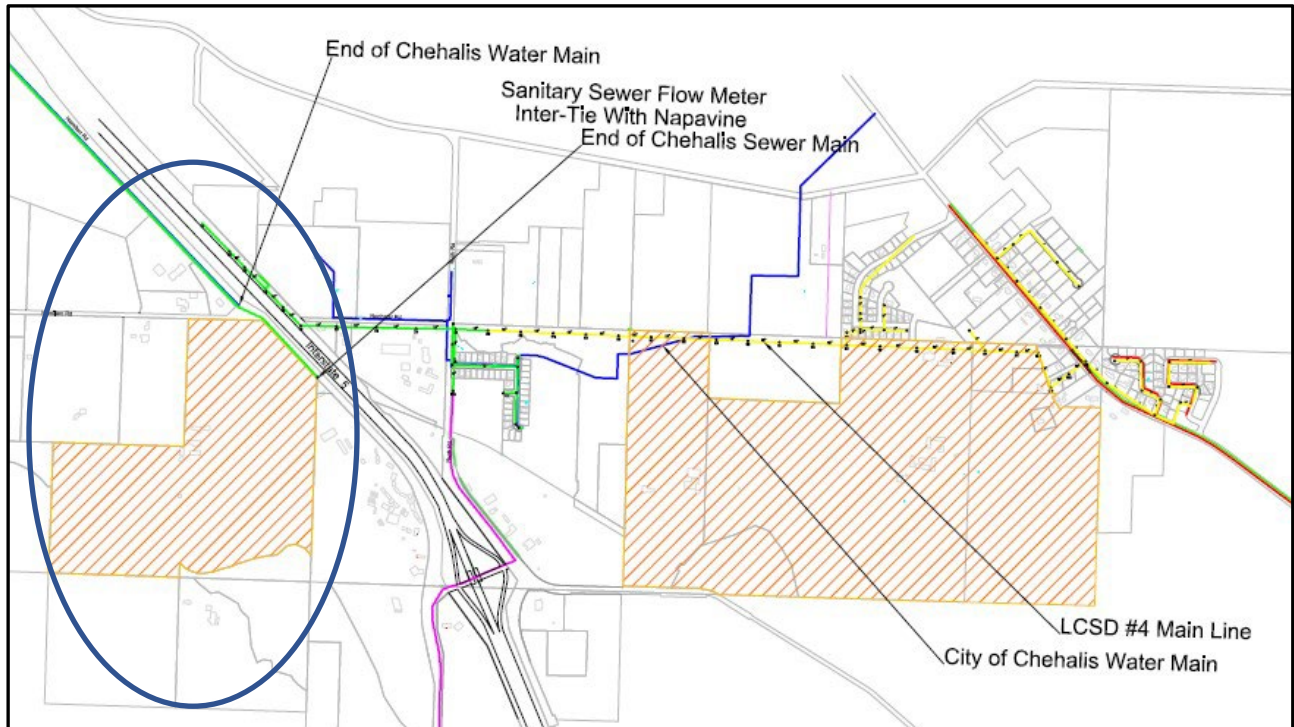
### 3. If an expansion, indicate the future land uses you intend to incorporate into your city's Comprehensive Plan's Future Land Use map.

The City envisions designating the expanded UGA area with a type of Mixed Use zoning that will encourage a variety of commercial uses, combined with affordable housing, preferably multi-family.

### 4. If an expansion, describe your public facilities and services plan to serve the area within the 20-year planning cycle.

Fortunately, both sewer and water infrastructure are immediately adjacent to the site and available for connection, as depicted on the map, below:

**Sewer and Water**



**5. If an expansion, describe your transportation improvement plan to serve the area within the 20-year planning cycle.**

Since the proposed UGA expansion area is currently in the County, the City of Chehalis has not been the responsible entity for transportation planning. However, if the UGA request is granted, and when the City annexes these areas, the transportation network will be folded into the City’s current transportation planning and maintenance framework. This would include prioritizing any needed improvements through the City’s annually adopted 6-year Transportation Improvement Plan, and through the goals and objectives laid out in the City’s Comprehensive Plan Transportation Element.

The following response was provided by the City’s Public Works Department:

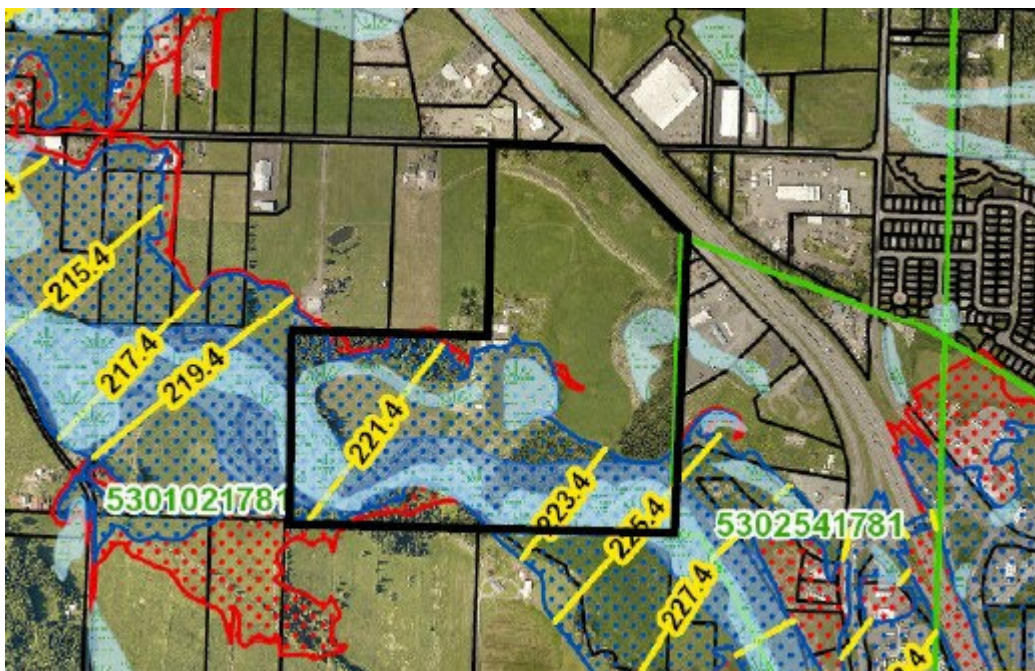
- The city’s list of arterials/collectors, roads that require frontage improvements inside city limits, will need to be updated to include those roadways, if any, that will be annexed in to city limits.
- If the road is inside the UGA, but not inside city limits, this is still legally a county road. The county has jurisdiction over ROW permits and improvement requirements.
- The needs of any given roadway will be assessed by each project individually, where the proposed project takes into account all development vested prior to their date of complete application.

- Initially, a trip generation study is needed, if the average daily trips in the peak hour & the peak direction are greater than 10, then a Traffic Impact Analysis is required. If the level of service is negatively affected beyond an already established limit, then mitigation measures are required for development.
- Mitigation measures can come in the form of stop lines, left turn lanes, right turn lanes, a 3<sup>rd</sup> middle turn lane, road widening, speed limit lowering, stop sign installation, traffic signal installation, crosswalk delineation, the installation of curb/gutter/sidewalk.
- Because each and every project submitted presents their own unique set of challenges, these mitigation measures must be considered individually for every project as it specifically applies to the proposal brought forth.

It should be noted that the proposed UGA expansion area is in an area that is already well-served by a transportation network suited to handle a high volume of traffic, with close access to Interstate 5.

**6. If an expansion, what environmental constraints exist within the area and how does the City intend to address those within the 20-year planning cycle?**

As depicted on the following map, the proposed UGA expansion area is partially encumbered by wetlands and the floodplain of the Chehalis River.



If the UGA expansion proposal is granted, the UGA will comply with WAC 365-196-310, which provides limited allowances for the expansion of a UGA into a floodplain, including when:

“(C) The land is owned by a jurisdiction planning under this chapter or the rights to the development of the land have been permanently extinguished, and the following criteria are met:

(I) The permissible use of the land is limited to one of the following: Outdoor recreation; environmentally beneficial projects including, but not limited to, habitat enhancement or environmental restoration; stormwater facilities; flood control facilities; and

(II) The development and use of such facilities or projects will not decrease flood storage, increase stormwater runoff, discharge pollutants to fresh or salt waters during normal operations or floods, or increase hazards to people and property.” [WAC 365-196-310 (C)(I)(II)]

As a condition of UGA expansion, the City of Chehalis will be requiring all areas within the floodplain to comply with the restrictions on development by requiring a conservation easement. The conservation easement will distinguish development rights and only allow activities that are provided for under the WAC, as listed above.