



STATE OF WASHINGTON

DEPARTMENT OF COMMERCE

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June 13, 2017

Ms. Ardele Steele
Planning and Community Development Director
503 First Avenue
Post Office Box 475
Zillah, Washington 98953

RE: Zillah's Comprehensive Plan Update

Dear Ms. Steele:

Thank you for sending to Growth Management Services the proposed amendments to Zillah's comprehensive plan and development regulations. We received the submittal on April 19, 2017, and processed with Material ID No. 23619. Please consider the following comments as you proceed through the adoption process.

We especially like the following:

- The plan includes thorough updates to background information and policies throughout each element. We especially appreciate the updated demographic, housing, and economic data. This information provides relevant facts and statistics to support strategic decisions and growth policies.
- The Natural Systems Element provides an excellent overview of Zillah's geology and natural setting, establishing a strong foundation to evaluate critical areas regulations.

We have concerns about the following that should be addressed before you adopt your plan and development regulation amendments:

- The Land Use Element includes a Suburban Residential (SR) category that allows lot sizes ranging from one to five acres. The two areas designated Suburban Residential are largely undeveloped, within close proximity to town. The property bounded by Schooley Road, adjacent to the Catholic Church, has urban zoning and an existing development directly to the east. The stated purpose of the SR designation is to provide a transition between urban and rural/agricultural areas.

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The Growth Management Act does not include provisions for “semi-rural” development, especially on undeveloped land inside existing city limits. There is no indication that these areas are environmentally constrained, or that services cannot be provided within the comprehensive plan lifespan. Further, it does not make economic sense for Zillah to allow large lot zoning within its city limits as the property will generally require the same amount of pipes, pavement, police and fire with fewer properties generating taxes to support needed infrastructure and government services. We strongly urge Zillah to reconsider the SR designation within its city limits.

- The Transportation Element includes 2016 Level of Service (LOS) information showing that all measured road segments meet the city’s adopted LOS standard of “C”. The chapter also includes projected travel volumes through the year 2040. However, there is no corresponding LOS analysis for 2040, making it difficult to know if Zillah will have transportation deficiencies over the plan’s lifespan.
- The Capital Facilities Element provides an excellent inventory of public infrastructure and lists projects over the next six years, with identified funding sources. The element adopts various facility plans by reference, including water and sewer plans. Our concern is that the facility plans do not match the timeframe of the comprehensive plan and use different population projections compared to the city’s 20-year allocation. For example:

The City’s water plan was completed in 2014 and projects water use to 2033, rather than the plan update year of 2040. The water plans uses a 2033 population projection of 5,307, compared to 5,016 people projected by the plan in 2040.

The City’s sewer plan was completed in 2012, with projected waste flows to the year 2031 and population projected at 5,111 people.

Congratulations to you and your staff for the good work these amendments represent. If you have any questions or concerns about our comments or any other growth management issues, please contact me at (509) 795-6884. We extend our continued support to the City of Zillah in achieving the goals of growth management.

Sincerely,



Scott Kuhta
Senior Planner
Growth Management Services

SK:lw

cc: Mark McCaskill, AICP, Managing Director, Growth Management Services
David Andersen, AICP, Eastern Region Manager, Growth Management Services
Ike Nwankwo, Western Region Manager, Growth Management Services