



STATE OF WASHINGTON

DEPARTMENT OF COMMERCE

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October 8, 2021

Melissa Bethel  
Community Development Director  
City of Moses Lake  
401 S. Balsam  
PO Box 1579  
Moses Lake, WA 98837

Sent Via Electronic Mail

RE: Periodic Update of the Moses Lake Comprehensive Plan

Dear Ms. Bethel,

Thank you for sending Growth Management Services the proposed amendments to the City of Moses Lake's Comprehensive Plan. We received the materials you submitted on August 24, 2021. We processed them with Submittal ID 2021-S-3049.

We appreciate your coordination with our agency as you work to achieve the community's vision consistent with the goals and requirements of the Growth Management Act (GMA). We recognize that the City has made a significant shift in the approach to long-range planning. We are writing to support the City's effort to update the Comprehensive Plan, adopt a Housing Action Plan, and amend the Urban Growth Area (UGA). Commerce commends your staff, community, and elected officials for developing long-term strategies to address housing, development, and infrastructure investments through proactive land use planning.

**Moses Lake Housing Action Plan:**

We commend the City on your Housing Needs Assessment (HNA) and the Housing Action Plan (HAP). We appreciate your detailed analysis of community and housing characteristics. You clearly identified barriers to increasing housing supply and affordability in Moses Lake, and developed the following strategies to address those barriers as you implement your HAP and Comprehensive Plan:

- Reduce minimum lot sizes in residential zones.
- Increase allowed housing types in existing zones
- Streamline permitting processes.
- Integrate added flexibility for planned or clustered subdivisions into the zoning code.
- Encourage income-restricted affordable housing development.
- Facilitate production of accessory dwelling units.
- Strategic infrastructure investments.

Your analysis served as a foundation for a more holistic review of other policies and elements of the Comprehensive Plan. Commerce wants to continue supporting this important work. We encourage you to apply for funding to implement your HAP and follow-through on the code changes and strategies identified in your implementation plan.

### **Moses Lake Urban Growth Area:**

In previous years Commerce expressed concerns over various UGA expansions proposed by the City. Our concerns primarily centered on the lack of a land capacity analysis to support the proposal, as well as a lack of analysis regarding the costs to provide capital facilities and urban services to support proposed expansions. We are pleased to see the City engage in a more rigorous evaluation of the existing UGA as part of the periodic update process. We are also encouraged by the collaboration we have observed with Grant County Development Services on potential UGA amendments.

We understand that elected and appointed officials are grappling with challenging decisions about whose property should be included in the Moses Lake UGA. As appointed and elected officials consider the proposed alternatives, we encourage Grant County and the City of Moses Lake to recognize that decisions about where and how growth occur should be based on the overriding public interest. Your decisions on how to accommodate new growth will have long-lasting impacts on local budgets, infrastructure, transportation facilities, the natural environment, and quality-of-life. Assessing the relationship between land use patterns, density, infrastructure, and public services is critical because the community is not only committing to the upfront capital costs, but to the operation, maintenance and eventual replacement of those facilities.

We are confident the work completed on the periodic update will yield positive, long-lasting results for the community. The City and County now have much better information regarding the cost of public facilities and services that are required to support new growth and development. We agree with the assertion that “The City should identify portions of the unincorporated UGA where it will be difficult to extend urban services within the planning period and consider such areas for removal from the UGA.”<sup>1</sup> The County cannot approve a UGA proposal unless there is a realistic, financially-constrained plan to provide urban services and facilities to the proposed UGA.<sup>2</sup>

### **Growth Rates and Population Allocation:**

We understand the community has raised concerns during the public process about growth rates and the amount of population allocated to the Moses Lake UGA. The primary purpose of establishing a twenty-year population projection is to determine UGA boundaries and make reasonable assumptions about infrastructure investments and the provision of urban services. Overly optimistic forecasts can result in long-term infrastructure commitments that run the risk of undermining other local priorities.

Grant County went through a process of selecting a countywide growth target and allocating growth to urban centers four years ago. The County selected the medium growth forecast from the Office of Financial Management, which is consistent with our agency’s recommendations. It is also the most likely countywide projection and reviewed thoroughly by state demographers.<sup>3</sup> The County allocated the majority of new

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<sup>1</sup> City of Moses Lake Land Capacity Analysis (Updated September 23, 2021)

<sup>2</sup> WAC 365-196-320 and 365-196-415

<sup>3</sup> RCW 43.62.035

urban growth to Moses Lake based on past trends, and the recognition that Moses Lake is a major employment center.<sup>4</sup>

Based on our review of the City's land capacity analysis, there is more than enough capacity in the Moses Lake UGA to accommodate twenty years of growth. In fact, it appears that with minor revisions to the development code recommended in the City's HAP, the City could accommodate all of the projected population within the City limits.

The City should feel confident with the good work completed by Grant County. We remind the community that although this is a twenty-year plan, City staff will be monitoring growth and have an opportunity to revisit growth rates prior to the 2027 periodic update. We recommend cities and counties collaborate on growth projections at least two years before a periodic update cycle, which means that the City and County should begin reassessing the existing projections in less than four years.

### **Capital Facilities and Costs:**

We appreciate the City's updates to the Utilities, Transportation, and Capital Facilities Elements. A clear understanding of revenue sources combined with capital and long term operation and maintenance costs for providing urban services in the Moses Lake UGA is critical to achieving the goals and policies in your Comprehensive Plan. One of the best ways to make a future land use plan come true is to use investments in public facilities to reinforce the plan.

These elements generally recognize the costs associated with major projects. We encourage you to consider better identifying specific revenue sources associated with these projects. This may include sources such as general taxes, user fees, impact fees, debt, capital reserves, and grants. It may be helpful to break down costs for the first six years to inform the Capital Improvement Program and Transportation Improvement Program, as well as costs for the rest of the planning period – years 7-20. The Commerce Capital Facilities Guidebook offers extensive details and examples for your consideration.

We encourage you to continue working closely with the Washington State Department of Transportation as you prepare an application for Grant County to amend the UGA boundaries. The City should ensure that assumptions about commercial and industrial development correlate with your projected population growth, consider historical absorption rates, and are grounded in market-based constraints. Based on the materials we reviewed, some of the assumed development patterns could cause failures for the state or local transportation systems. Removing undeveloped, vacant portions of the UGA or decreasing the overall size of the UGA may mitigate these failures and relieve congestion on state and local systems.

### **Development Standards in the Unincorporated UGA:**

The introduction includes a section on implementation, and Exhibit 1-1 identifies specific steps for the City to take in upcoming years. We appreciate the City's intent to focus on development regulations in the unincorporated UGA. As the City and County move forward with the UGA review and adoption, one of our core recommendations is to commit to adopting policies, agreements, and regulations on how development occurs in the unincorporated UGA.

Development phasing is a critical tool to prevent a pattern of sprawling low-density development from occurring or vesting in areas prior to the ability to support urban densities. Development phasing can delay

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<sup>4</sup> Grant County Comprehensive Plan – Table 4-8

the need for new infrastructure, allowing the community to accommodate growth and development at a lower cost. Once a low-density pattern occurs, it is more difficult to serve with urban services, is less likely to achieve urban densities<sup>5</sup>, and limits potential tax revenue which could ultimately create a financial liability for the County. Our administrative rule, WAC 365-196-330, provides guidance on phasing development in the unincorporated UGA.

Strong policies, regulations and standards for development in the unincorporated Moses Lake UGA will benefit both the City of Moses Lake and Grant County. We are happy to work with staff as you consider changes to strengthen the development standards.

### **Development Regulations and Critical Areas Ordinance:**

The City is required to review, and if necessary, revise the Comprehensive Plan and development regulations, including critical areas regulations, as part of the periodic update.<sup>6</sup> Commerce tracks completion of the periodic update requirement through three milestones – the comprehensive plan, the development regulations, and the critical areas ordinance. Based on our discussions, we understand the City is prioritizing a review and update of the development regulations and critical areas ordinance in the next year. Failure to complete all milestones of the periodic update will impact eligibility and ratings for certain grant and loan programs. Please feel free to contact us, and other state agencies, if you need assistance on this work.

We extend our continued support to Moses Lake in achieving the goals of the Growth Management Act and the vision of your community. Thank you again for the opportunity to comment. If you have questions or would like technical assistance, please feel free to contact me at [william.simpson@commerce.wa.gov](mailto:william.simpson@commerce.wa.gov) or 509-280-3602.

Sincerely,



William Simpson, AICP  
Senior Planner  
Growth Management Services  
Washington State Department of Commerce

WS:lw

cc:

Dave Andersen, AICP, Managing Director, Growth Management Services  
Ben Serr, AICP Eastern Regional Manager, Growth Management Services  
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Damien Hooper, Development Services Director, Grant County  
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Eric Pentico, Habitat Biologist, Washington Department of Fish and Wildlife

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<sup>5</sup> WAC 365-196-330(3)

<sup>6</sup> RCW 36.70A.130

Laura Hodgson, Associate Planner, Growth Management Services  
George Mazur, Regional Transportation Planner, WA Department of Transportation