

November 16, 2022

Planning Commission  
Thurston County  
2000 Lakeridge Dr. SW  
Olympia, WA 98502

## **DESKINS UGA EXPANSION PROPOSAL**

Dear Commissioners,

I am writing to encourage your support of our proposed UGA expansion. It has been discussed that the Thurston County Regional Planning (TRPC) finding in the last buildable lands report that there is a surplus of industrial and commercial land in the Grand Mound UGA, but their analysis is based on an aged Subarea Plan (which is the point of this update) and relies on making assumptions that very little growth will happen outside of more government and tribal jobs. As I mentioned in my earlier public comments during one of the Grand Mound work sessions, much of this land is not available for development and/or it is in tribal ownership.

There was a letter and map submitted in October to the Commission by Toyer Strategic that showed there is less than half the land available than what TRPC has indicated, which analysis did not further account for land in tribal ownership. In sum, there is not a surplus of land in the Grand Mound UGA and that the employment allocation for Grand Mound isn't supporting private employment in industries that create family wage jobs in Grand Mound (and South County).

Specific to my property, I believe it is important to point out that the county's critical areas mapping is based on modeling and not an actual delineation. Further, while Prairie Creek may be nearby, its buffers and the other protections established by the county are uniform regardless of what zone may be applied. I believe that development of this site will establish needed infrastructure for stormwater that will reduce untreated surface water run-off that otherwise comes from the highway and agricultural use of this property. Combined with other general requirements of county code (like landscaping buffers around projects, etc.) allowing this property to development in the Grand Mound UGA will provide higher levels of protection for Prairie Creek than the status quo.

In the work sessions, staff and some Commissioners have questioned whether this proposed UGA expansion meets or is "consistent" with the criteria in countywide planning policies. We offer up the analysis of how proposal is consistent:

Part "a" – all of the following:

**Criterion (i): For South County jurisdictions: the expansion area can and will be served by municipal water and transportation in the succeeding 20 years. South County jurisdictions must demonstrate that the expansion can be served by sewage disposal measures that provide for the effective treatment of wastewater in the succeeding 20 years.**

*There is substantial capacity in the Grand Mound sewer system and there are improvements made to the system over the years that need to be paid back by new development paying connection charges. Because this property is*

*located abutting the Grand Mound UGA, it would be very easy to extend sewer to this site. It is absolutely possible that sewer can serve this site within the succeeding 20 years.*

**Criterion (ii): For North County jurisdictions: the expansion area can and will be served by municipal sewer, water, and transportation in the succeeding 20 years.**

*This criterion does not apply.*

**Criterion (iii): Urbanization of the expansion area is compatible with the use of designated resource lands and with critical areas.**

*The property is currently used for a residence and for limited agricultural purposes, however the property is not a designated resource land. This expansion area proposed has abutting urban development planned on two sides and it fronts on a state highway less than ¼ mile from a interchange with Interstate 5. Urbanization of the site is not incompatible.*

**Criterion (iv): The expansion area is contiguous to an existing urban growth boundary.**

Yes.

**Criterion (v): The expansion is consistent with these County-Wide Planning Policies**

*The expansion is consistent with the Countywide Planning Policies that encourage the county to shift course to respond and adopt to future social, economic, and environmental challenges. The significance of Grand Mound has and will continue to change, as it can provide local family wage jobs and a tax base that the county, especially South County, need to be sustainable. See Countywide Planning Policies: 1.7; 1.13; 7.1; 7.2; 7.3, etc.*

Part “b” – one of the following:

**Criterion (i): There is insufficient land within the Urban Growth Boundary to permit the urban growth that is forecast to occur in the succeeding 20 years; or**

*Yes. As I pointed out in my remarks in the first work session, there is insufficient land in the UGA to support private sector economic development and the creation of good jobs. The forecast for employment growth is also inaccurate. As pointed out by Toyer Strategic’s letter to the commission, the land capacity has been over estimated, and the employment forecast was focused on government and tribal job creation. This update to the Grand Mound plan is very important leading up to the County’s next twenty-year update as it is the right time for the commission to set new goals for economic development here.*

**Criterion (ii): An overriding public interest demonstrating a public benefit beyond the area proposed for inclusion would be served by moving the Urban Growth Boundary related to protecting public health, safety and welfare; enabling more cost effective, efficient provision of sewer or water; and enabling the locally adopted Comprehensive Plans to more effectively meet the goals of the State Growth Management Act.**

*There are many overriding public interests supporting this requested expansion, including:*

*Protection of water quality. Urban level development of this property would result in the creation of stormwater infrastructure that appropriately collects and treats stormwater and releases it in a more control way that will help ease long-term flooding concerns nearby. This would be beneficial to and support Prairie Creek.*

*Creating a better UGA boundary. This UGA expansion will add property within ¼ mile of an interchange of Interstate 5 and a state highway. Land within a ¼ mile radius of a freeway interchange should be designated for urban levels of development to ensure that development happens proximate to major transportation networks and available utilities. Making these areas urban relieves pressure to convert other properties further area into sprawling, low-density development.*

*Grow the County Tax Base. South county needs more jobs, especially family wage jobs. Even more importantly, the county needs to improve its tax base (property and sales taxes) to provide the residents of Grand Mound will the urban services needed.*

I urge the Planning Commissioners to recommend approval of the Deskins UGA expansion proposal and ensure that the Grand Mound Subarea Plan is updated to reflect the county's full economic development needs in this area.

Sincerely,

Ryan Deskins