Rivera, Eva

From:	350 Yakima Climate Action <350yakimaclimateaction@gmail.com>
Sent:	Monday, November 16, 2026 3:47 PM
To:	Preston, Bill; Martin, Trevor; Ask Planning
Cc:	Felipe Rodriguez-Flores; Bob Cox; Ray Paolella
Subject:	SECOND ADDITIONAL Comments to Yakima Comprehensive Plan 2050 Update and State Environmental Policy Act (SEPA)
Attachments:	SEPA Failing Septic Systems in Capacity Analysis.pdf

Dear Mr. Preston, Mr. Martin, and the Planning Commission,

Attached is 350 Yakima Climate Action's SECOND ADDITIONAL Comments (these with regard to water and wastewater environmental impacts arising from failing septic systems in two underserved communities and overburdened/underserved neighborhoods in the City of Yakima) regarding the Yakima Comp Plan 2050 Climate Resilience Subelement.

We request that this letter, together with all prior submitted comments and attachments be included in the public record for Comprehensive Plan 2050 and the associated SEPA process.

Thank you for your consideration,

350 YAKIMA CLIMATE ACTION
Coleen Anderson, President
Raymond Paolella, Member

cc: Felipe Rodriguez Flores, Vice President
Bob Cox, Secretary

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350 Yakima Climate Action acknowledges we live and work on the ancestral lands of the fourteen Confederated Tribes and Bands of the Yakama Nation. The people of the Yakama Nation inhabited more than 12 million acres across Adams, Benton, Chelan, Douglas, Franklin, Grant, Kittitas, Klickitat, and Yakima Counties. We thank the caretakers of this land who have lived here and continue to live here since time immemorial.

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November 16, 2026

Bill Preston and Trevor Martin
Yakima City Planning Division
129 N. 2nd Street
Yakima, WA 98901

RE: Yakima Comprehensive Plan 2050 and State Environmental Policy Act (SEPA)

Dear SEPA Responsible Official and City Planning Manager:

Please accept this second additional comment letter from 350 Yakima Climate Action on the SEPA Environmental Checklist and proposed Determination of Non-Significance pertaining to the GMA-required Climate Resiliency Subelement and Water and Wastewater Environmental Impacts and Failing Septic Systems in Overburdened Communities resulting from and allowed by adoption of the Comprehensive Plan. Please include this letter in the official record for the Yakima Comprehensive Plan 2050 and compliance with the State Environmental Policy Act (SEPA).

WATER AND WASTEWATER ENVIRONMENTAL IMPACTS

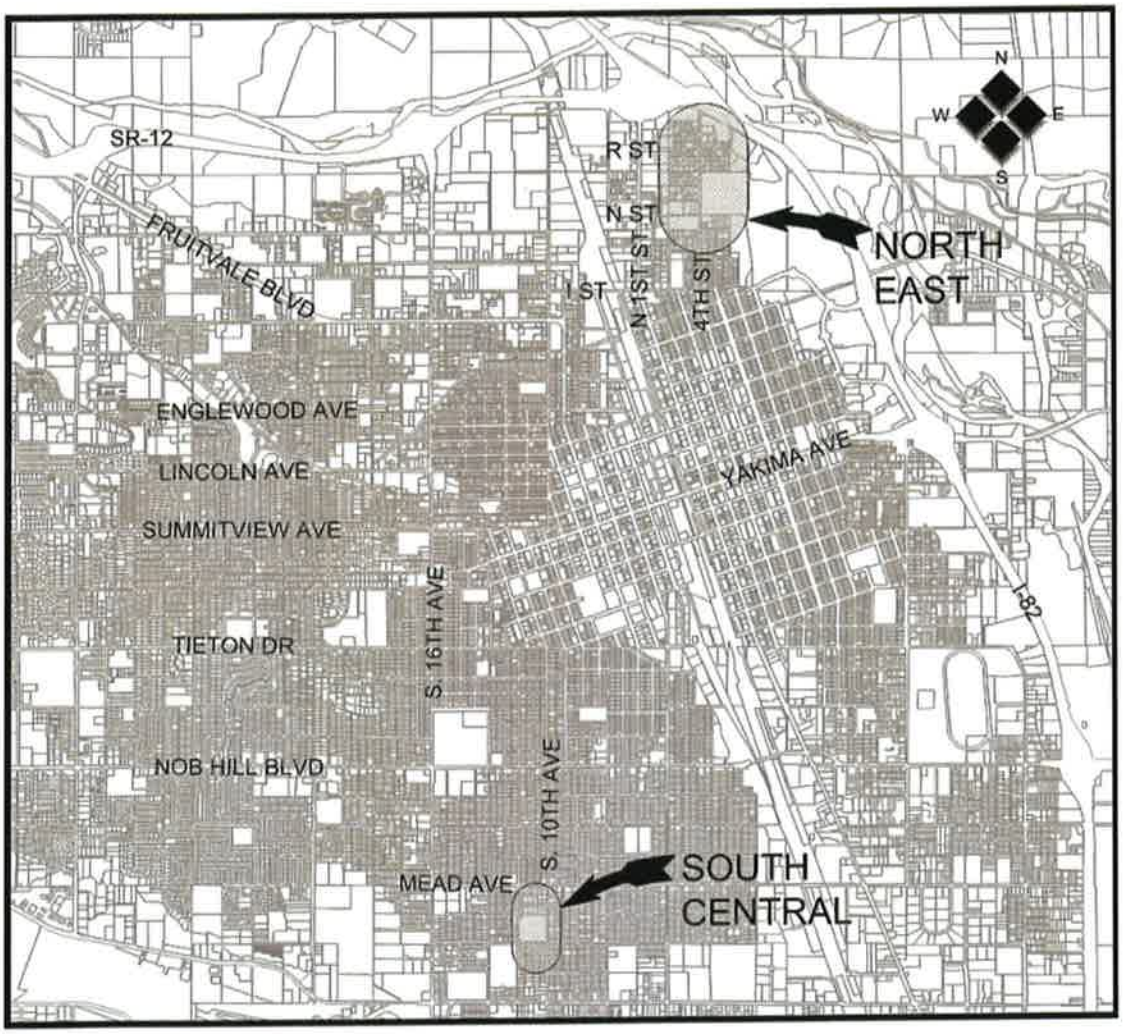
The SEPA Environmental Checklist and proposed DNS fail to analyze the impacts of failing septic systems in two underserved communities in Yakima North East Overburdened Community and South Central underserved neighborhood. This is despite the Draft Comprehensive Plan Technical Analysis recognizing these areas as having higher environmental health disparities. This is so even though there appears to be ample capacity elsewhere in the City.

1. Map of underserved/overburdened communities in North East and South Central Yakima:

https://www.usbr.gov/drought/docs/2024/DRP-049_City_of_Yakima_508.pdf

"Figure 2. Two areas of the City of Yakima's Expanding Water and Wastewater Access to Underserved Communities project.

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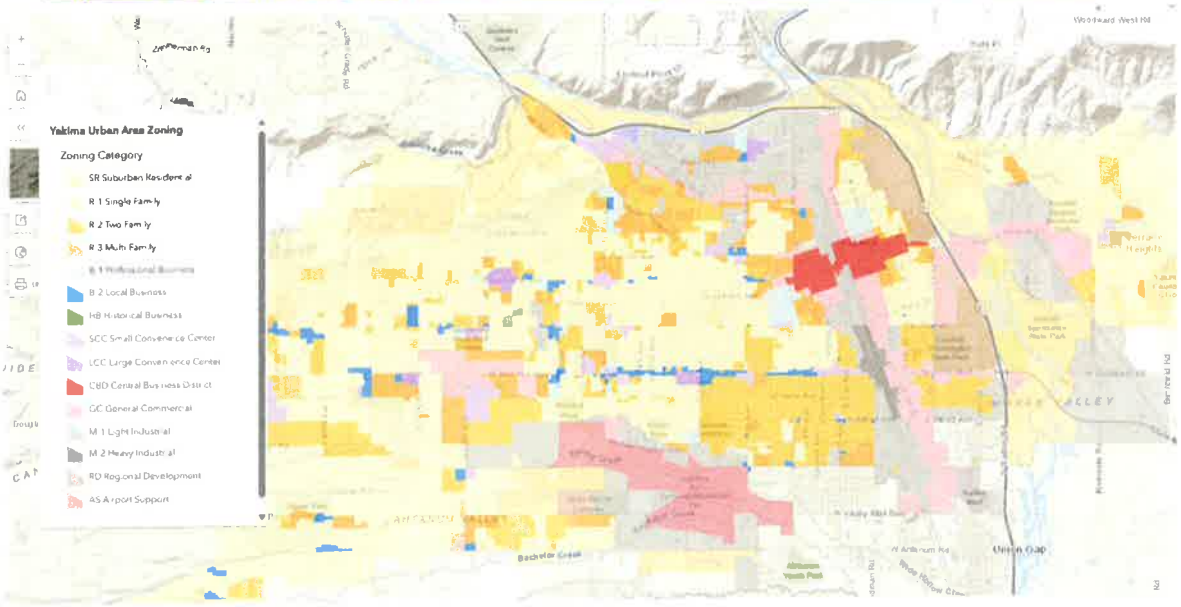
Existing Conditions North East Area: Census Tract 53077000200 Situated in Yakima's Opportunity Zone, the project area represents approximately 70 parcels without City sanitary sewer services and approximately 47 parcels without City water services. Developed parcels without City water and sewer services are using shallow, individual wells and individual septic systems. Reliability of municipal wells has been challenged with the frequency and durations of recent droughts in Washington State. Shallow wells experience extreme reliability challenges and are susceptible to pump failure when groundwater levels fall below pump elevations. Due to the close proximity of the septic systems on the same small City parcels, shallow wells also pose considerable risk to public health because of their susceptibility to contamination. Many of the private wells and septic systems are aged or past their expected useful life. The combination of low-income residents, high cost of replacement systems, and low-value housing, is the cause for

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many of the 100-year or older homes to be condemned and abandoned without the assistance of grant funding.

From City of Yakima 2023 WaterSMART Page 4-5 of 24

2. City of Yakima Zoning Map
https://www.yakimawa.gov/services/planning/files/2025/05/InteractiveZoningMap.png

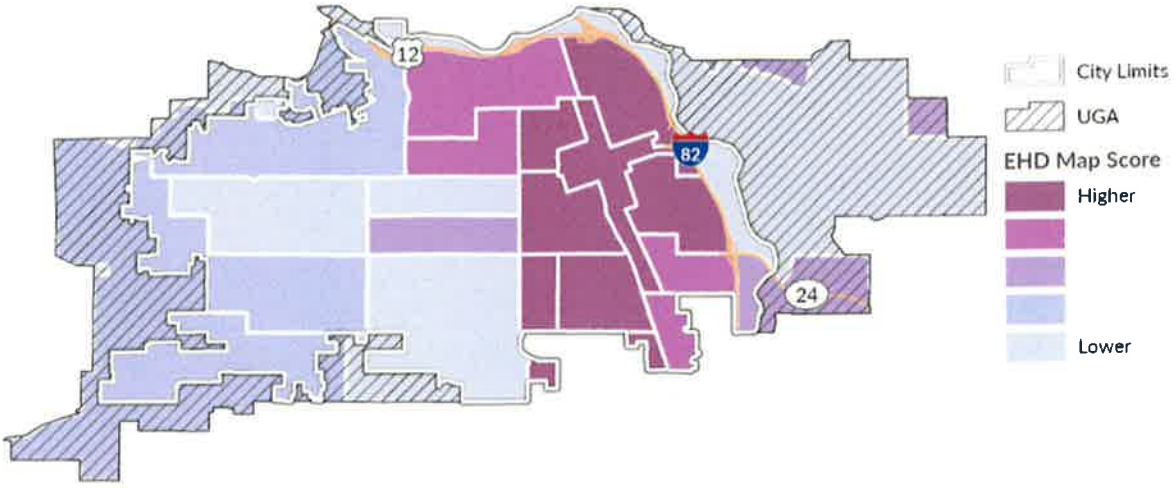


Zoning map appears to show zoning districts in north east include R-1 Single Family, R-2 Two Family, and GC General Commercial districts while south central include R-1 Single Family and R-2 Two Family districts.

3. These areas appear to be identified as in higher health disparities areas of the city per the draft Comprehensive Plan Technical Analysis. https://cityofyakimawa-my.sharepoint.com/:w:/g/personal/trevor_martin_yakimawa_gov/IQAP_vfD1soQRaZSL8GCP-m0AZN34Db_JiPqH_8_GP_ND24?rtime=eiwxsllD30g

4. **Exhibit ~~3-463-46~~. Environmental Health Disparities Map Score, City of Yakima, 2022**

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5. Volume 2 Technical Analysis projects new housing capacity: https://www.yakimawa.gov/services/planning/cpas/

The Technical Analysis does not demonstrate that new development is precluded in these areas. See Exhibits 2-27, 2-25, ad 2-24. The Comprehensive Plan allows for infill development and greater land use densities in underserved areas with failing septic systems that will continue to develop even though there is ample capacity elsewhere in the City.

Exhibits 2-27 Net New Housing Units by Zone

Exhibit 2-27. Net New Housing Units by Zone

Zone	Unit Capacity (Incorporated City)	Unit Capacity (Unincorporated UGA)	Unit Capacity (Entire UGA)
SR	665	3,710	4,375
R-1	7,095	15,776	22,871
R-2	6,944	3,327	10,271
R-3	3,273	617	3,890
B-1	186	1	187
B-2	426	116	541
HB	0	0	0
SCC	516	396	912
LCC	74	0	74
CBD	187	0	187
GC	1,301	145	1,445
M-1	0	0	0
M-2	0	0	0
RD	1,062	0	1,062
AS	0	0	0
Total	21,728	24,087	45,815

Exhibit 2-25. Density and Mixed-Use Split Assumptions by Zone in the Yakima UGA

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Zone	Units per Acre	Floor Area Ratio	Square Feet per Job	Split (Residential/ Non-Residential)
Residential: SR (single-family)	4	N/A	N/A	100% / 0%
Residential: R-1 (single-family)	7	N/A	N/A	100% / 0%
Residential: R-2 (two-family)	12	N/A	N/A	100% / 0%
Residential: R-3 (multi-family)	18	N/A	N/A	100% / 0%
Mixed-use: B-1	15	0.26	500	50% / 50%
Mixed-use: B-2	15	0.26	500	50% / 50%
Mixed-use: SCC	15	0.26	500	50% / 50%
Mixed-use: LCC	15	0.26	500	50% / 50%
Mixed-use: CBD	15	2.00	500	50% / 50%
Mixed-use: GC	15	0.26	500	33% / 67%
Mixed-use: HB	N/A	1.00	500	50% / 50%
Industrial: M-1	N/A	0.45	1,000	0% / 100%
Industrial: M-2	N/A	0.45	1,000	0% / 100%
Mixed-use: RD	15	0.35	500	50% / 50%
Airport: AS	N/A	N/A	1,000	0% / 100%

Exhibit 2-24. Developable Land Area by Zone, Entre Yakima UGA shows

Zone	Yakima UGA	Vacant	Agricultural	Partially-used	Redevelopable
Suburban Residential: SR	1,227	543	104	580	0
Single-Family Residential: R-1	3,319	1,388	373	1,558	0
Two-Family Residential: R-2	1,231	333	149	0	749
Multifamily Residential: R-3	303	114	40	0	149
Professional Business: B-1 (Mixed-use)	36	16	0	0	19
Local Business: B-2 (Mixed-use)	85	24	8	0	53
Historical Business: HB (Mixed-use)	0	0	0	0	0
Small Convenience Center: SCC (Mixed-use)	124	68	37	0	20
Large Convenience Center: LCC (Mixed-use)	10	1	0	0	9
Central Business District: CBD (Mixed-use)	33	8	0	0	25
General Commercial: GC (Mixed-use)	360	204	3	0	152
Heavy Light Industrial: M-1	763	392	87	0	283
Industrial: M-2	17	11	0	0	6
Regional Development: RD (Mixed-use)	145	114	0	0	31
Airport Support: AS	94	94	0	0	0
Total	**7,747**	**2,246**	**395**	**827**	**2,047**

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Determination of Significance

Due to probable, significant adverse climate impacts associated with anticipated development and identified future projects that will be allowed under Comprehensive Plan 2050, the SEPA Responsible Official is required to issue a Determination of Significance. 350 Yakima Climate Action respectfully requests that the City of Yakima withdraw the proposed DNS and prepare an Environmental Impact Statement for the proposed Comprehensive Plan Amendments. We request that this letter, together with prior comments and attachments all be included in the public record for Comprehensive Plan 2050 and the associated SEPA process.

350 Yakima Climate Action appreciates the opportunity to comment on the SEPA Environmental Checklist and proposed DNS.

Thank you for your consideration,

/s/

Coleen Anderson, President
Raymond Paolella, Member
350 Yakima Climate Action

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