

DUVALL ANNEXATION PLAN

The purpose of this plan is to provide a policy basis for the processing, timing and phasing of the City of Duvall's remaining annexation areas. There are several properties within the City of Duvall's urban growth area (UGA) that could be annexed to the City in the next twenty years. Some areas are candidates for annexation within the near-term (i.e. next five years) due to: proximity to existing services, potential for urban development, capacity for accommodating growth targets and consistency with comprehensive plan policies. Other areas, specifically the East and Southeast UGA Reserve, are not candidates for annexation in the near term, but may be considered for annexation in later years.

There are practical limits to how much land can be annexed at one time. First and foremost, the residents of Duvall have expressed that community character and "small town" quality of life are highly valued, and therefore it is the goal and intent of the City to preserve these qualities to the extent possible through measured annexation and growth. Second, due to Duvall's small size, the capacity to process multiple annexations and the subsequent development activity is limited. Phased annexation allows for an orderly and cost-effective expansion of city services without severely impacting staff that provide daily services to existing city residents and businesses. Following are policies intended to guide City actions related to the remaining annexation areas:

Definitions:

Urban Services – Typically refers to water, sewer, and stormwater system capacity and line extensions; police services; fire services.

BRB – Boundary Review Board

Goals and Policies

AX 1 Goal: Maintain or enhance the quality of life for existing residents and for future residents of annexation areas.

- AX 1.1 Newly annexed areas should receive the same type and level of urban services, where defined, as provided throughout the rest of the City.
- AX 1.2 The City shall use pre-annexation agreements, development agreements and other mechanisms to ensure that Duvall's community character and quality of life are maintained, to the extent possible.

AX 2 Goal: Ensure annexations are phased in a manner that is logical and cost-effective for the City.

- AX 2.1 The City shall be the provider of urban infrastructure and services, except for fire protection, in all potential annexation areas.

AX 2.2 The City shall not accept an annexation petition until such time as the City determines urban infrastructure and services can be provided in an efficient and cost-effective manner.

AX 2.3 Areas shall be annexed in phases, considering the following criteria:

1. Areas that have a land use designation in the 2004 Comprehensive Plan shall be annexed prior to areas designated “Urban Growth Area Reserve;”
2. Consistency with the City’s Comprehensive Plan goals and policies, particularly population and employment targets;
3. Consistency with the City’s economic development goals;
4. Availability of services to the area, in particular storage/processing capacity and/or consistency with the City’s planned service extensions;
5. Provision for a variety of housing types, including affordable units;
6. Providing benefit to the larger community through the creation of jobs, affordable housing, increased sales tax base, or added educational, recreational or cultural opportunities;
7. Maintaining level of service standards for urban services (i.e. utilities, police, fire, parks services) where defined;
8. Providing urban services in a cost-effective manner;
9. Sufficient size of the proposed annexation to be cost-effective for City staff to process;
10. Configuration consistent with BRB criteria to ensure likelihood of approval; and
11. Availability of staff and other resources for processing annexation applications and development permits.

AX 2.4 Ensure that newly annexed areas assume their fair share of City indebtedness.

AX 3 Goal: Create City boundaries that facilitate the efficient delivery of City services.

AX 3.1 The City should support annexations that lead to the efficient provision of services such as police, water, sewer, and transportation.

AX 3.2 The City should support annexation of areas where it already provides City services.

AX 3.3 Individual parcels of reluctant property owners or voters should not be excluded from the annexation proposal when that exclusion would make the annexation inconsistent with City policies or BRB criteria.

- AX 3.4 All non-redeveloping properties that annex into the City should be encouraged to phase out their septic systems and connect to the City sewer system. (Duvall Comprehensive Plan policy CF – 6.6)
- AX 3.5 Public facility improvements within annexed areas that have a citywide benefit should be considered for city funding as part of the Duvall capital facilities planning process.

AX 4 Goal: Provide full and complete evaluation of annexation proposals.

- AX 4.1 Development proposals should be reviewed separately from, and subsequent to, annexation applications.
- AX 4.2 Larger annexations should be encouraged for efficient use of City resources in processing the annexation. Smaller annexation proposals (less than 10 acres) may be considered when they address peninsulas or islands of unincorporated county land or create a more logical service boundary.
- AX 4.3 A fiscal impact assessment of the proposed annexation, including such information as costs to provide service, tax revenues, and effects on the City's bonding capacity should be conducted for each annexation. At the City's discretion, the assessment shall be conducted by the applicant(s) and reviewed by the City or conducted by the City; in either case all costs shall be borne by the applicant(s). The City has the ability to retain professional assistance in either reviewing and or conducting the assessment.
- AX 4.4 The City may pre-zone properties prior to annexation to provide predictability about development potential.
- AX 4.5 Zoning proposed for an annexation area shall be consistent with Duvall's adopted Comprehensive Plan.
- AX 4.6 Existing land uses, development, and redevelopment potential should be considered when evaluating a proposed annexation.
- AX 4.7 Pre-annexation and/or development agreements to address issues such as timing, cost, extension of infrastructure and expectations related to the annexation and/or development of the property should be in place prior to adopting an annexation ordinance.
- AX 4.8 The City should ensure that property owners and residents in proposed annexation areas are fully informed of the obligations and requirements that may be imposed upon them as a result of annexation.

- AX 4.9 At least one open house/public meeting should be conducted for each annexation to provide opportunities for public input.
- AX 4.10 Research, and if feasible, develop a mechanism to ensure that the potential annexation areas pay for necessary general fund services and for needed infrastructure prior to annexation proposals being approved, except that annexation of land for public purposes shall be allowed. (Duvall Comprehensive Plan policy LU 10.2)
- AX 4.11 The City should encourage multiple property owners within an annexation area to work collaboratively to resolve issues related to utilities, parks, stormwater facilities, roads, and other issues determined by the City to be prerequisites to annexation. The City shall not accept or process annexation applications until it is satisfied that the issues have been resolved or that a “good faith effort” has been made by property owners.

AX 5 Goal: Retain the UGA Reserve for long-term growth capacity.

- AX 5.1 The City should evaluate the need to increase its population and employment capacity no more than once every five years from the adoption of its Comprehensive Plan Update.
- AX 5.2 Areas designated as UGA Reserve, except properties that may be needed for public uses, shall not be annexed until the City determines the following specific actions, at a minimum, have been taken:
1. The City has determined what acreage is necessary for growth capacity;
 2. Land use plans have been prepared for the area and the Comprehensive Plan has been amended to reflect the new land use designation(s); and
 3. Urban services are sufficient to provide for the build-out of the proposed annexation area; and
 4. Financial measures are in place to ensure that any development pays for itself in terms of general government services.
- AX 5.3 All policies that apply to the designated Urban Growth Area shall also apply to any UGA Reserve areas that may be considered for annexation to the City.
- AX 5.4 The City shall not extend services into the UGA Reserve area until it has been annexed, with the exception of water service in accordance with the Water Comprehensive Plan.
- AX 5.5 The City shall update its Annexation Plan to address phasing within UGA Reserve only when all necessary planning has been done in that area and it is deemed necessary to proceed with annexation.

Phasing

There are five individually defined potential annexation areas within the Duvall UGA (see map). One of these, TNR, is currently in process and could be part of the city by this summer. Three other areas would eliminate some illogical boundaries and could be considered for annexation in the near term (0-5 years). The UGA Reserve is a larger area on the eastern edge of the City that should be considered beyond the initial 5-year annexation plan. These areas are described in more detail below and presented in the recommended order of annexation.

TNR (Northeast UGA) – bounded by existing city limits on the south, east, and west, this area is approximately 40 acres and designated R4.5 in the City's Comprehensive Plan. This area is currently in process for being annexed to the City. Main issues that were identified during a public meeting that was held on April 12, 2006 include traffic and the perception that additional development may negatively affect Duvall's community character. *Potential Timing – 2006*

South UGA – bounded by existing city limits to the west and east, NE Big Rock Rd to the south and the South Multi-Family area to the north. The South UGA consists of approximately 60 acres and is designated for commercial (retail and office) and employment (industrial and office) uses in the City's Comprehensive Plan. There is currently a comprehensive plan amendment application on file with the City to change the land use designation and allow for a mix of commercial, residential and institutional uses. Preliminary plans include approximately 350 new dwelling units in a variety of types, some mixed use commercial and a campus for Lake Washington Technical College (LWTC). The college would provide educational opportunities to residents of Duvall and the surrounding community. Timing of the annexation is critical due to state funding requirements – LWTC must own ten acres of land within the City limits by June 2007. The community-wide benefits of LWTC locating in Duvall are the primary reason this area should be the City's highest annexation priority. The college is supported by the goals and policies of the City's Comprehensive Plan and its Economic Development Action Strategies. In order for the annexation to be complete by June 2007, the City should begin the process in June 2006. *Potential Timing – 2006-2007*

South Multi-family (MF) – The South MF area consists of approximately 40 acres, divided into 17 parcels. It is bisected by NE 143rd Pl and bounded by the existing city limits on the west, north and east and by the South UGA annexation area to the south. If the South UGA were to be annexed first, this area would become an unincorporated island within the City. BRB criteria and past decisions are clear that islands create illogical service areas and therefore should not be allowed. For this reason, the South MF and South UGA areas should be combined into one annexation. This could potentially simplify the annexation because the combined areas have more than 60% of their boundaries contiguous with the existing city limits. Under RCW 35.13, cities may initiate an annexation through an interlocal with the county for areas that have at least 60% of their boundary contiguous with the city and contain less than 100 acres in area. This option could be the most straight-forward provided the interlocal with the County

would not be complicated and provided there is little or no opposition to the annexation in the area being annexed. *Potential Timing – 2006-2007*

North Island – The North Island consists of approximately 72 acres, divided into 13 parcels, and is bounded by the existing city limits on the south, west and east and by the UGA to the north. There are significant steep slopes on the northern portion of this area which could preclude development. This area is designated for residential and is expected to be subdivided and developed under R4 zoning upon annexation. There are multiple property owners within this area which could complicate and potentially delay completion of any pre-annexation agreement. This factor, along with the size of the area and the lack of transportation infrastructure are the primary reasons it is recommended for annexation potentially in 2008. Due to its large area and configuration, the City could also consider annexation in two separate phases, divided by the extension of NE Bird Street:

North Island South – North Island South projects furthest into existing City boundaries and is contiguous on three sides. There is currently one improved road, 275th Ave NE, that extends into this area.

North Island North – North Island North would logically follow the southern portion so as to not create an unincorporated island. Assuming the southern area annexes separately, this portion would then be contiguous to the City on three sides.

Potential Timing – 2008

UGA Reserve – The UGA Reserve contains over 300 acres and includes the south and southeast urban growth areas. These areas are designated as reserve in the Comprehensive Plan because they represent additional capacity beyond the City's growth targets for population and employment. With the capacity in the potential annexation areas of the City that already have specific land use designations there is no need to annex these areas in the next five years. The City periodically should review the need for and potential capacity of these areas. *Potential Timing – To be determined but not prior to 2013*

Other Areas – Other areas adjacent to City Limits (i.e. north side of City between Cherry Valley Road and Main Street and other similar areas) may be annexed for municipal purposes as the City determines necessary. Areas that are in the UGA Reserve may also be annexed for municipal purposes.

Potential Timing – As needed

Island Annexations

State law (RCW 35.13) allows cities to initiate annexations for areas that are less than 100 acres in size and have 60% of the boundary contiguous with the city when there is an interlocal with the county. If there is no interlocal, the boundary must be 80% contiguous. The process under this circumstance is much simpler and potentially less

time-consuming. Duvall should consider using this method for the South UGA/South MF areas and possibly for the phasing of the North Island areas. A critical factor to consider with this method is whether there is any likely opposition within the “island” to be annexed. The City can unilaterally proceed with annexation and adopt an ordinance without going through the BRB; however, the action is subject to referendum and requires only a petition with only 10% of registered voters within the annexation area to force the referendum. For Duvall, this method may be most appropriate to save time in the South UGA/South MF area.

Pre-annexation Agreements

Petitioners should be required to enter into a pre-annexation agreement before the City approves an annexation. Such an agreement allows the City to stipulate certain actions be taken by petitioners before an annexation is adopted by the City. Furthermore, an agreement better informs the petitioners of the City’s goals and intentions for the area being annexed. Following are examples of process- and service-related conditions that could be covered in a pre-annexation agreement.

General Intent – The City may state its general intent for annexing specific areas. An example for Duvall could be “to further implementation of the Comprehensive Plan by providing additional employment and educational opportunities for residents and to provide for a greater mix of housing types.”

Time limitations - The agreement may include a timeframe in which the annexation or certain conditions must be met or the agreement becomes null and void.

Zoning – The agreement may include a reference to the specific zoning that will apply to the individual properties upon annexation. This can avoid confusion or misunderstandings if there is more than one zoning category that could apply. This clause could also provide the petitioners with certainty about the zoning the property would receive.

Development Agreement – When the City has concerns about the development that is likely to occur after annexation, it may include the requirement for a development agreement before or after the annexation is completed, at the City’s discretion. Unlike the pre-annexation agreement, which includes conditions specific to the annexation, the development agreement would cover issues related directly to the development of the property. Duvall, for example, may include language in a development agreement that would phase the development applications over several years to ensure staff is not overwhelmed with permit review.

Development Fee Credits – If the City requires “upfront improvements” by the developer as part of the pre-annexation or the development agreement, there may be credits toward the City’s development or impact fees that should be specified in the agreement. Credits are typically given upon performance of the obligations identified in the agreement. Credits may be tied to conveyance of land or infrastructure development.

Reimbursement of City Costs – Petitioners will be required to reimburse the City for the cost of staff and/or consultant time for processing the annexation, including preparation of the pre-annexation agreement and development agreement, if applicable.

Cooperation – Agreements often contain a clause requiring each party to cooperate fully in the annexation process. There may be more specific language regarding issues such as the timely provision of information, requiring public testimony in support of the annexation effort, and/or agreement to not oppose or interfere with another related action (e.g. another annexation that would occur prior to the petitioners’).

Mediation – In the event that the parties are unable to resolve disputes related to the annexation, there may be a clause agreeing to mediation prior to filing of any court action.

Public Improvements – As part of a pre-annexation agreement, petitioners may be required to apply city standards to any development or improvements that might occur prior to annexation. Typically, a development agreement would cover the actual requirements to construct and install, or pay for construction and installation of certain street and utility improvements after annexation, though it could be applied in the annexation area if the development were to occur prior to annexation.

Dedication of Land – The City may require the petitioners to convey a specified amount, or specific parcel(s) of property for public use at the time of annexation. Examples of public uses include parks, trails, fire and police stations, and rights-of-way.

Pre-zoning and Concurrent Rezoning

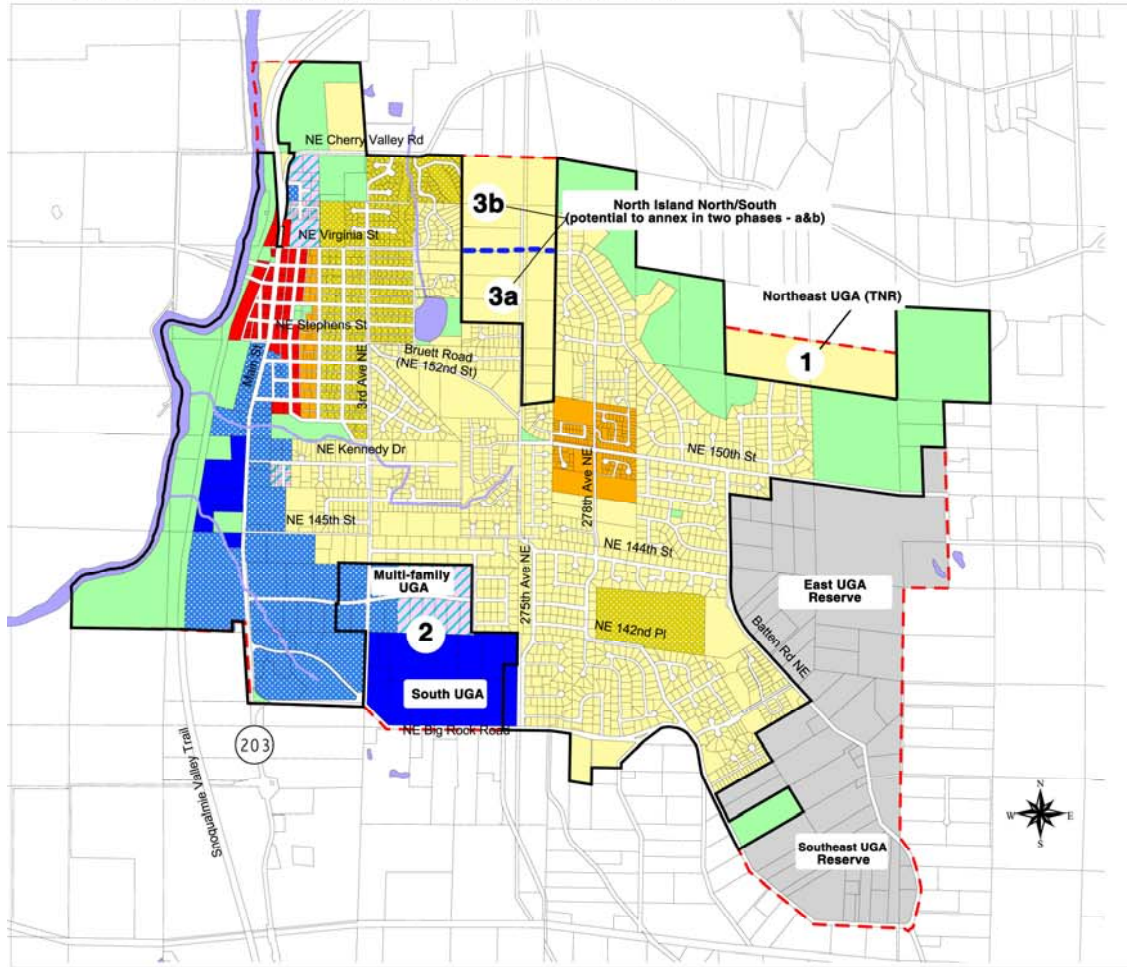
Prior to annexation to a city, county zoning regulates the development of property. Under state law, city zoning is not automatically applied upon annexation. Cities must take separate action from the annexation in order to apply the city’s zoning designation and regulations to the annexed properties. This can be done concurrent with or prior to the annexation. In either case, the zoning must be consistent with the City’s Comprehensive Plan and it requires SEPA review.

The most common mechanism used by cities is a concurrent rezone. This requires a separate public hearing and adoption of a separate ordinance from the annexation. Typically, the public hearing on the zoning is held at the same meeting as the public hearing on the annexation ordinance or at the same meeting where the ordinance for the annexation and the rezone are being considered for adoption. The ordinance for the rezone should be adopted after the ordinance for the annexation.

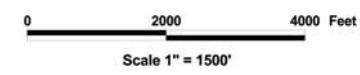
Pre-zones are used by cities to provide predictability or assurances to property owners of a prospective annexation about what the zoning will be once the property is annexed. The process can follow the City’s traditional rezone process and requires notification of surrounding property owners, a public hearing, and adoption of an ordinance by city council. The ordinance must specify that the zoning does not become effective unless and until the property is annexed by the City. If the City has concerns about the timing of

the annexation, the pre-zone ordinance could have a sunset clause to expire if the annexation does not occur within a specified time period.

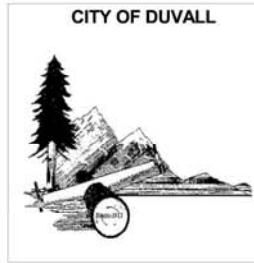
CITY OF DUVALL ANNEXATION PHASING PLAN



LEGEND	
	City Limits
	Urban Growth Boundary
Comprehensive Plan Designations	
	R4 - 4.5 Residential 4- 4.5 units per acre
	R6 Residential 6 units per acre
	R8 Residential 8 units per acre
	R12 Residential 12 units per acre
	MU Mixed Use - commercial and residential
	CO Commercial - retail and office
	LI Light Industrial - light industrial and office
	PF Public Facilities (parks, schools, city facilities)
	UGAR Urban Growth Area Reserve



Source: City of Duvall Comprehensive Plan, Future Land Use Map, adopted November 23, 2004



For more information, contact the City of Duvall at 425-788-2779.

APPENDIX – ANNEXATION PROCESS

A **Methods** – there are several methods that can be used depending upon the type of city (e.g. code v. non-code) and the type of annexation. This section describes the 3 most common.

- 1 **Direct Petition** – this was the often-used method before the Moses Lake decision because it is less costly and provides a more predictable outcome than the election method. It also allows the city to be more directly involved in activities that are supportive of the annexation. In areas that are predominantly undeveloped, this is usually the method of choice.
 - i 10% petition
 - ◆ Area proposed for annexation by property owner(s)
 - ◆ signatures representing ownership of 10% of assessed valuation submitted to city
 - ◆ city council accepts (or rejects) petition or modifies boundaries w/in 60 days of notification
 - ii 60% petition (unless rejected by city council at 10% stage)
 - ◆ Signatures representing ownership of 60% of assessed valuation submitted to city, county assessor must validate and notify city whether 60% requirement has been met – signatures are valid for 180 days or process should start over
 - ◆ City holds public hearing and accepts (or rejects) 60% petition
 - ◆ City submits annexation packet to Boundary Review Board
 - ◆ BRB approves if no request to invoke jurisdiction – holds hearing if invoked, maximum 120 day review period w/possible extension for hearing
 - ◆ If BRB approves, there is a 10-day appeal period to BRB and 30-day appeal period to Superior Court
 - ◆ If BRB denies – appeal to Superior Court, cannot be resubmitted for 12 months
 - ◆ City holds public hearing to approve annexation and adopt zoning (unless pre-zoning completed)
 - ◆ City conducts census and submits to OFM
- 2 **Election** – this is similar to the petition method in how it begins, but once the initial petition is filed with the city, it is limited in what can be done. Cities are essentially restricted to carrying out their statutory function in the process and providing impartial, factual information. The city still has the option of accepting or rejecting the annexation, even if it is approved by the voters.
 - i Initiated by petition with signatures of 10% of registered voters residing within the annexation area and based on votes cast in last state general election rather than property valuation (signatures valid for 180 days)
 - ii County assessor must validate petitions
 - iii City Council may accept and submit packet to BRB or reject annexation

- iv BRB review process same as for Direct Petition method, if approved by BRB, returned to City to conduct election
- v Ballot typically includes 2 items:
 - ◆ For or against annexation
 - ◆ For or against accepting proportionate share of city's bonded indebtedness
- vi If approved (only registered voters residing in the annexation area are eligible to vote), City has option of accepting or rejecting annexation
- vii OFM census

3 **Alternate (50/50 Petition)** – this method was passed by the legislature after the State Supreme ruled the direct petition method to be unconstitutional in the Moses Lake decision. Remarkably, the Court reversed their own decision one year later, but the new method was already being used and continues to be a popular alternative because it addresses the issue of voters having a voice in the decision without requiring a costly election.

- i Combines petition and election method – uses petition but requires 50% of acreage and 50% of registered voters within the annexation area representing a majority of the acreage (signatures valid for 180 days)
- ii Follows same path as direct petition method, starting w/petition representing 10% assessed value
- iii Council accepts, rejects or modifies request, decides whether to require share of bonded indebtedness
- iv If Council approves, then goes to 50/50 petition stage
- v Assessor must validate petition signatures
- vi If validated, City Council holds public hearing and approves or rejects annexation (no actual vote by residents)
- vii OFM census

B **BRB composition (as of 04/2006)** – the King County Boundary Review Board is comprised of 11 members each serving 4-year staggered terms. 3 members are appointed by the Governor, 3 are appointed by the County Executive, 3 are appointed by the cities, and 2 are appointed by the special purpose districts. The King County BRB is currently chaired by *Chuck Booth, former mayor of Auburn; members include 2 other former mayors, A. J. Culver (Issaquah) and *Roger Loschen (Lake Forest Park); Evangeline Anderson (Bellevue, realtor), Angela Brooks (Seattle, planner), Robert Cook (SeaTac, former special purpose district official), Lynn Guttman (Seattle, management consultant, formerly worked for Bothell & Renton in high level management of PW and planning), Ethel Hanis (Kent, formerly w/Soos Creek Water & Sewer District), *Claudia Hirsche (Newcastle, transportation planner/engineer, former city council member), Michael Marchand, vice-chair (Bellevue, former PR officer for Governor), *Judy Tessandore (Fall City, PACCAR employee, active in 5th district Democrats). *Terms expire Jan. 2007. Hanis' term expired Feb. 2006. Brooks is moving out of state in May.

C Factors to be Considered in Decision (RCW 36.93.170)

In reaching a decision on an annexation proposal, the board must consider certain factors affecting the proposal. My experience has been these are not usually an issue because the comprehensive planning process is presumed to have addressed many of the following factors in GMA counties:

- Population and territory;
- Population density;
- Land area and land uses;
- Comprehensive plans and zoning and development regulations;
- Applicable service agreements adopted under chapter 36.115 or 39.34 RCW;
- Applicable interlocal annexation agreements between a county and its cities;
- Per capita assessed valuation;
- Topography, natural boundaries, and drainage basins;
- Proximity to other populated areas;
- Existence and preservation of prime agricultural soils and productive agricultural uses;
- Likelihood of significant growth in the area and in adjacent incorporated and unincorporated areas during the next ten years;
- Location and most desirable future location of community facilities;
- Municipal services and the need for municipal services;
- Effect of ordinances, governmental codes, and regulations on existing uses;
- Present cost and adequacy of governmental services and controls in area;
- Prospects of governmental services from other sources;
- Probable future needs for such services and controls;
- Probable effect of annexation or alternative on cost and adequacy of services and controls in area and adjacent area;
- Effect on the finances, debt structure, and contractual obligations and rights of all affected governmental units;
- Effect of the annexation on adjacent areas, on mutual economic and social interests, and on the local governmental structure of the county.

D Objectives of the Board (RCW 36.93.180)

The boundary review board is directed by RCW 36.93.180 to “attempt to achieve” the following objectives with respect to an annexation. If the BRB invokes jurisdiction, they will use the following objectives in making their decision about whether or not to approve an annexation. These “objectives” have posed problems in the past because they can be applied “subjectively” by individual

board members, particularly where they are vague or ambiguous. In some instances they can even be in direct conflict. For example, objective “b” suggests that physical features such as land contours are desirable boundaries; however, objective “d” calls for the prevention of “abnormally irregular boundaries.” Land contours can be some of the most abnormally irregular lines on a map.

- a. **Preservation of natural neighborhoods and communities** – the main issue here is they do not want to see neighborhoods split between jurisdictions; the challenge is that “neighborhoods and communities” is not well defined and can be used to foster emotional opposition to an annexation.
- b. **Use of physical boundaries, including but not limited to bodies of water, highways, and land contours** – this one is almost always a challenge because physical boundaries often do not make sense for jurisdictional and taxation purposes, i.e. property lines do not always follow physical boundaries. One important rule of thumb to use is if you are annexing up to the edge of a road, they will usually require you to take in the entire right-of-way. They do not like annexations that go to the centerline of a road or stream.
- c. **Creation and preservation of logical service areas** – this is one of the more straight-forward objectives because it is easier to make a case for logical service boundaries, though different types of services may have different logical boundaries. Using Pacific again as an example, for purposes of sewer and water it may be logical to have the area up on the plateau; however, for police and fire it is difficult to serve.
- d. **Prevention of abnormally irregular boundaries** – as discussed above this is sometimes in conflict with objective “b.” Difficulties also arise in defining what is “abnormally irregular,” which can be very subjective, and when using property ownership as the basis for boundaries. Trying to annex a portion of the South UGA annexation area to avoid annexing the South Multi-Family area is likely to run afoul of this objective.
- e. **Discouragement of multiple incorporations of small cities and encouragement of incorporation of cities in excess of 10,000 population in heavily populated urban areas** – fortunately this one does not apply.
- f. **Adjustment of impractical boundaries** – based on my quick review of your annexation map, this could be advantageous in arguing for certain annexations to make the city boundaries more “logical” and “practical” for purposes of providing services.
- g. **Incorporation as cities or towns or annexation to cities or towns of unincorporated areas that are urban in character** – under GMA this objective has almost become moot; however, it should not be ignored because even though you have designated all of these areas as urban, they are primarily undeveloped. If any member of the BRB wanted to oppose the annexations, they could use this as one of their arguments.

- h. **Protection of agricultural and rural lands that are designated for long term productive agricultural and resource use by a comprehensive plan adopted by the county legislative authority** – probably not an issue, but if you have any designated agricultural or resource lands that are located within an annexation area we would need to address the issue directly and explain how they would be better protected under the city’s jurisdiction.