



STATE OF WASHINGTON

DEPARTMENT OF COMMERCE

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March 22, 2021

Derrick Braaten
Planning and Building Director
502 W. Boeing St
Pasco, WA 99301

RE: Proposed Amendments to the Franklin County Comprehensive Plan – Periodic Update

Dear Mr. Braaten,

Thank you for sending Growth Management Services the proposed amendments to Franklin County's Comprehensive Plan. 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 received the materials you submitted on January 15, 2021 and we processed them with Submittal ID 2021-S-2263.

We particularly like the following features of your Comprehensive Plan and supporting materials:

- The County modernized the style and format of the Comprehensive Plan. The new format is easier to read and navigate. It will help the public understand how local goals and policies relate to the Franklin County Code and local development patterns.
- The Comprehensive Plan includes new language and information about implementation in the Introduction. The plan recognizes a variety of ways to implement the adopted goals and policies, including the zoning code, development regulations, infrastructure investments, taxation programs, and other subarea plans. Implementation strategies are critical to achieving planning goals and policies.
- County staff and your consulting team have proactively worked with our agency throughout the update process to solicit feedback on best practices and compliance with the GMA. The County is faced with a number of challenging land use and transportation issues resulting from high growth rates near Pasco. We appreciate that you allowed us to participate early in the planning process, beginning in 2017, as you discussed the population projection and allocation process. You have also incorporated our recommendations on your initial drafts of the countywide planning policies and resource lands policies.

- The new Countywide Planning Policies included in the Introduction represent a significant improvement over the original policies. We are particularly pleased to see the focus on inclusive and equitable housing policies, along with policies encouraging coordination between cities and counties on development standards in unincorporated urban growth areas (UGAs). The Land Use Element also recognizes the need for ongoing coordination between cities and counties to implement your respective plans: *“As a result, continued positive coordination between the County and City planning and building departments are of paramount importance, especially when a city Land Use map must be interpreted for implementing county zoning districts and so forth.”*¹
- The Land Use Element includes new language and maps for Military Training Routes (MTR). Military and Defense is a key economic sector and constitutes an industry that cuts across many sectors in Washington, helps create the backbone for a strong economy through our diverse defense missions and military installations, our pioneering companies, and our military friendly communities. The new language recognizes the importance of communication with the Department of Defense when considering the siting of new energy infrastructure. We appreciate the County’s intent to exchange project information with the US Military in cases where a potential development could affect a mapped MTR. This represents a best practice, is consistent with our guidance on military/land use compatibility, and we appreciate your focus on good intergovernmental coordination.
- The Rural Lands Sub-Element includes a new focus on water resources and wise stewardship of this important resource. It recognizes the importance of protecting surface and groundwater as a means of ensuring regional economic vitality and the protection of rural character. If the County intends to develop a water-banking program or engage in additional hydrogeological studies, we encourage you to proactively work with our state agency partners and keep us informed.
- The Rural Lands Sub-Element adds two new policies to encourage planning for Firewise principals. The policies should provide a framework to consider densities and development approaches that limit the impacts of wildfires on citizens in rural areas.
- The Resource Lands Sub-Element adds new language and clarifies the process for designating or de-designating resource lands of long-term commercial significance. Agriculture and food manufacturing are critical to the state and regional economy, and we appreciate your ongoing efforts to protect commercially significant agricultural resource lands. Your Economic Development Element recognizes the critical role of agriculture for the future viability of Franklin County’s economy. Strong policies and regulations to protect and enhance agricultural land and industries will continue to boost economic output in the County and in Southeast Washington.
- The County has amended the Housing Element to reflect that “decent, safe, and affordable housing is a basic human need, and ensuring that present and future Franklin County

¹ Franklin County 2018-2038 Comprehensive Plan - Land Use Element

residents have a wide range of choices and options is an important part of planning for the future.”² We also appreciate new language in the element discussing housing types such as farmworker housing, student housing, recreational vehicles, multi-family housing, and group homes.

We have the following concerns and suggestions that you should consider prior to final adoption of your Comprehensive Plan:

- Commerce tracks the completion of the periodic update through three milestones: the Comprehensive Plan, implementing development regulations, and a critical areas ordinance (CAO). We understand that the County adopted changes to Title 14 of the local code, however additional review and potential updates to the development regulations and critical areas regulations are necessary before the periodic update is complete. Failure to complete the periodic update will impact eligibility and ratings for certain grant and loan programs.
- The legislature amended the GMA to include the goals and policies of the Shoreline Management Act (SMA) as one of the statewide, GMA planning goals. The County should adjust Table 1 in the Introduction to include Shoreline Management as one of the GMA Planning Goals.³
- The County’s Rural Sub-Element includes goals and policies on Agritourism. The Resource Lands Sub-Element includes an important policy that limits nonagricultural uses to areas of a farm with poor soils or lands not suitable for agricultural purposes. The GMA recognizes the importance of supplemental income from accessory uses, but those must be limited to ensure for the protection of the entire agricultural industry. We encourage the County to include additional language in the Comprehensive Plan and development regulations based on the requirements for innovative zoning techniques on agricultural lands in 36.70A.177(3). For example, nonagricultural accessory uses and activities, including new buildings, parking, or supportive uses, shall not be located outside the general area already developed for buildings and residential uses and shall not otherwise convert more than one acre of agricultural land to nonagricultural uses.⁴
- After reviewing public comments and testimony before the Pasco Planning Commission, the Pasco City Council, and the Franklin County Planning Commission, we understand that elected and appointed officials are grappling with challenging decisions about whose property should be included in the Pasco UGA. We remind the County that a UGA may not exceed the area necessary to accommodate the growth management planning projections, in addition to a reasonable land market supply factor.⁵

The City of Pasco submitted an application to the County, with a commitment to provide public services and facilities, through what they’ve called the preferred alternative. The

² Franklin County 2018-2038 Comprehensive Plan – Housing Element

³ RCW 36.70A.480

⁴ RCW 36.70A.177(3)(b)(ii)

⁵ WAC 365-196-310(2)(e)

County has the final authority to determine the UGA boundary, but adopting a UGA boundary larger than the preferred alternative would conflict with UGA sizing requirements, and GMA goals to reduce sprawl.⁶ In addition, Pasco's capital facilities and transportation plans are based on the preferred alternative. Any expansion beyond that proposal would require additional analysis and confirmation that the City is able to provide public services and facilities for the proposed areas. Reductions to the preferred alternative are less of a concern.

- Our agency and the Washington State Department of Transportation (WSDOT) have repeatedly expressed concerns with UGA expansions that may impact the Tri-Cities Airport over the last six years. We are disappointed that the City continues to propose expanding the UGA in the vicinity of the airport after smaller proposals did not move forward in 2015 and 2017. We previously informed the City as they were developing the UGA proposal that the City and County can meet the growth allocation without expanding the UGA in a manner that could impact future airport operations by increasing densities elsewhere in the proposed expansion area, or changing some of the commercial land use designations to mixed-use designations. We understand recently adopted development regulations are designed to mitigate impacts from the airport, however, WSDOT and Commerce recommend local governments practice a philosophy of "do no more harm" in regards to land use and aviation planning.

The Tri-Cities is one of the fastest growing regions in Washington. According to WSDOT, the demand for commercial passenger air service as well as air cargo are forecast to increase in the future. Airports with existing commercial service will play a vital role in trying to meet the demand for air service. SeaTac International Airport is reaching the limits of its capacity and existing commercial service airports will be needed to help meet the demand. The Tri-Cities Regional Airport in Pasco is critical to the region's transportation system providing air passenger and cargo service to southeast Washington. It is Washington's fourth largest airport. Passenger traffic grew over 25% between 2015 and 2019.⁷

The limited airspace in Eastern Washington is under increasing demand. It is important that Franklin County and Pasco support land use decisions that allow the airport, an essential public facility, to operate and expand as the region grows. The County's Land Use Element prioritizes the importance of limiting development and compatible land uses near the Tri-Cities Airport. The Economic Development Element recognizes that "The Tri-Cities airport is another key piece of the transportation system facilitating economic activity and fostering economic development opportunities."⁸ We strongly encourage you to make an adjustment to the proposed alternative that will not undermine the long-term economic growth for the region, nor contribute to public health and safety concerns for future community members.

- The Countywide Planning Policies and the Land Use Element include strong new policies encouraging and requiring collaboration with cities on development in unincorporated UGAs. There is a trend in the unincorporated Pasco UGA of allowing large-lot development on septic

⁶ RCW 36.70A.020(2)

⁷ WSDOT Comment Letter to Pasco re: Draft EIS (June 15, 2020)

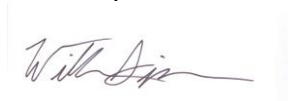
⁸ Franklin County 2018-2038 Comprehensive Plan - Economic Development Element

systems. These development patterns create long-term financial liabilities for the City and County, and undermine GMA requirements.⁹ The County should be aware that Pasco may never annex large-lot developments approved by the County because providing urban services represents too much of a financial burden. The County may be taking on significant liabilities in terms of infrastructure maintenance and replacement if you fail to develop regulations ensuring that development occurs at urban densities. We've observed similar issues in other fast-growing regions throughout the State, and encourage you to proactively address the problem while it is still possible.

As the City and County move forward with the UGA review and adoption, our core recommendation 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 also lower or delay the need for new infrastructure, allowing the community to accommodate growth and development at a much lower cost. Once a low-density pattern occurs, it is more difficult to serve with urban services, is less likely to achieve urban densities¹⁰, 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. We've also provided the City of Pasco with examples from other Counties in Washington. The County needs to take a lead role in addressing this problem, and we are committed to partnering with you as you continue working to ensure that development actually occurs as envisioned in the EIS and your respective Comprehensive Plans.

Once again, we thank you for your continued coordination with our agency and other stakeholders. We extend our continued support to Franklin County in achieving the goals of the GMA and the vision of your community. Thank you again for the opportunity to comment. If you have any questions or would like technical assistance on any land use issues, please feel free to contact me at william.simpson@commerce.wa.gov or 509-280-3602.

Sincerely,



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⁹ RCW 36.70A.110

¹⁰ WAC 365-196-330(3)

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