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January 27, 2021

Mr. Derrick Braaten  
Planning and Building Director  
Franklin County Planning and Development Department  
502 W Boeing Street  
Pasco, WA 99301

Dear Mr. Braaten:

Subject: Comments on the Determination of Non-Significance CPA 2018-04/File SEPA 2020-15.  
Sent via email: dbraaten@co.franklin.wa.us

Thank you for the opportunity to comment on the Determination of Non-Significance CPA 2018-04/SEPA 2020-15. Futurewise works throughout Washington State on the implementation of the Growth Management Act (GMA). We work with local communities to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests and water resources. We have members across Washington State including Franklin County.

Futurewise has participated in the public engagement process on the Franklin County Comprehensive Plan update and City of Pasco urban growth area (UGA) expansion. Because of the environmental impacts of the proposed comprehensive plan update, we recommend that an adequate environmental impact statement (EIS) be prepared for the proposal. While the city did an EIS, it did not adequately address the important impacts on agricultural lands of long-term commercial significance; fire safety; transportation; historic, cultural, and archaeological resources; water resources; air quality or greenhouse gas emissions; priority habitats and species; or native plants.

### **Impacts on Fire Services and Fire Safety Measures**

Residential growth in the City of Pasco and Franklin County has increased the exposure of residents on the Wildland Urban Interface to wildfires.<sup>1</sup> Expanding the city onto agricultural and rural lands will increase this exposure. Fire services are an element of the environment.<sup>2</sup> The impacts of the UGA expansion on community fire safety must be analyzed and mitigation measures identified such as directing growth away from areas with a moderate to high wildfire threat level.<sup>3</sup> Another potential

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<sup>1</sup> *Franklin County, Washington Community Wildfire Protection Plan* pp. 48 – 51 (Approved by the Franklin County Commissioners 2014) accessed on January 26, 2021 at: [https://www.dnr.wa.gov/publications/rp\\_burn\\_cwpp\\_franklin\\_co.pdf](https://www.dnr.wa.gov/publications/rp_burn_cwpp_franklin_co.pdf) and enclosed in a separate email with the filename: “rp\_burn\_cwpp\_franklin\_co.pdf.”

<sup>2</sup> WAC 197-11-444(2)(d)(i).

<sup>3</sup> See the *Franklin County, Washington Community Wildfire Protection Plan* pp. 45 – 46 (Approved by the Franklin County Commissioners 2014) for the threat level map.





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mitigating measure would be to require new developments to meet Firewise Communities program standards or the equivalent.

The changing climate will also increase wildfires in the West including Franklin County. A recent peer-reviewed study showed that human caused global warming has made wildfire fuels drier and caused an increase in the area burnt by wildfires between 1984 and 2015.<sup>4</sup> Global warming's drying of wildfire fuels is projected to increasingly promote wildfire potential across the western US.<sup>5</sup> The area of this increase in drying fuels includes the area of the City of Pasco's proposed UGA expansion.<sup>6</sup> This environmental impact requires the preparation of an EIS.

## Transportation

Transportation systems, vehicular traffic, the movement and circulation of people or goods, and traffic hazards are elements of the environment.<sup>7</sup> Air traffic is also an element of the environment.<sup>8</sup> The comprehensive plan and the urban growth area expansion has the potential to increase vehicle miles traveled and to increase traffic hazards. In addition, the urban growth area expansion will adversely impact the operations and expansion potential of the Tri-Cities Airport. The adverse impacts on the transportation system, including motor vehicles, air transportation, transit, walking, bicycling, and transportation safety, require the preparation of an EIS.

## Historic, Cultural, and Archaeological Resources

Historic and cultural preservation are elements of the environment.<sup>9</sup> The Washington State Department of Archaeology and Historic Preservation has developed an archaeological predictive model that can predict where archaeological resources, a type of cultural resource, are likely to be located and where the department recommends archaeological surveys should be completed before earth disturbing activities and other uses and activities that can damage archaeological sites are undertaken.<sup>10</sup> The predictive model shows that there is a "high risk" and "very high risk" of cultural resources being located in the urban growth area expansion.<sup>11</sup> Land development can adverse impact these resources and the impacts of development authorized by the comprehensive plan and the UGA expansion on historic and cultural resources should be evaluated in an EIS.

## Water Resources

Water including surface water movement, quantity and quality, runoff and absorption, groundwater movement, quantity, and quality, and public water supplies are all elements of the environment.<sup>12</sup>

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<sup>4</sup> John T. Abatzoglou and A. Park Williams, *Impact of anthropogenic climate change on wildfire across western US forests* 113 PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES OF THE UNITED STATES OF AMERICA (PNAS) 11770 p. 11773 (Oct. 18, 2016) accessed on January 26, 2021, at: <http://www.pnas.org/content/113/42/11770>

<sup>5</sup> *Id.*

<sup>6</sup> *Id.* at p. 11771.

<sup>7</sup> WAC 197-11-444(2)(c).

<sup>8</sup> WAC 197-11-444(2)(c)(iii).

<sup>9</sup> WAC 197-11-444(2)(b)(iv).

<sup>10</sup> Washington State Department of Archaeology and Historic Preservation WISAARD webpage last accessed on January 27, 2021 at: <https://dahp.wa.gov/historic-preservation/find-a-historic-place>

<sup>11</sup> *Id.*

<sup>12</sup> WAC 197-11-444(1)(c).





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Water conservation and focusing growth into existing cities and towns can stretch water supplies and accommodate growth and it is important to reserve water for agriculture and value-added agricultural processing and manufacturing to maintain and enhance the county economy.<sup>13</sup> The development authorized by the comprehensive plan and the urban growth area expansions can adversely affect water and increase water use and runoff. Again, these impacts mandate the preparation of an EIS.

## Air Quality and Greenhouse Gas Emissions

Air quality is an element of the environment.<sup>14</sup> Elevated ozone level averages in the Tri-Cities for 2015 through 2017 exceeded the federal regulatory limit which could trigger sanctions from the Environmental Protection Agency. As a result, a joint study was conducted with the Department of Ecology, Washington State University, and Benton Air Authority, the Tri-Cities Ozone Precursor Study (T-COPS). The study found that elevated ozone levels are not caused by one source and that traffic emissions are a major source of air pollutants in the Tri-Cities<sup>15</sup>. Particulate matter from vehicle emissions, fires, and blowing dust contribute to unhealthy air quality that increase symptoms of asthma and heart disease. Weather, topography and wind directions contribute to high-levels of ozone in the Tri-Cities. Expanding the urban growth boundary will likely increase vehicle miles travelled and emissions. Development will increase dust. These are all probable adverse impacts on elements of the environment and need to be analyzed and mitigated in an EIS.

## Climate Impacts

Climate is also an element of the environment.<sup>16</sup> Washington State enacted limits on greenhouse gas emissions and a statewide goal to reduce annual per capita vehicle miles traveled for light-duty vehicles. Comprehensive planning is one way to address both the reduction of greenhouse gases and vehicle miles traveled. Almost half of all greenhouse gas emissions in our state result from the transportation sector. Land use and transportation strategies that promote compact and mixed-use development and infill reduce the need to drive, reducing the amount of greenhouse gas emissions.<sup>17</sup> Expanding the urban growth boundary will likely increase vehicle miles travelled and emissions. These are all probable adverse impacts on elements of the environment and need to be analyzed and mitigated in an EIS.

Additionally, the U.S. Environmental Protection Agency (EPA) found that state and local governments can significantly reduce greenhouse gas emissions through land and materials management practices such as materials efficiency, industrial ecology, green design, land revitalization, sustainable

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<sup>13</sup> United States Environmental Protection Agency, *Growing Toward More Efficient Water Use: Linking Development, Infrastructure, and Drinking Water Policies* pp. 3 – 5, p. 8 (EPA 230-R-06-001: January 2006) last accessed on January 26, 2021 at: <https://www.epa.gov/smartgrowth/growing-toward-more-efficient-water-use>

<sup>14</sup> WAC 197-11-444(1)(b)(i).

<sup>15</sup> Department of Ecology website, Air Quality Studies, “Tri-Cities Ozone Precursor Study (T-COPS)” <https://ecology.wa.gov/Asset-Collections/Doc-Assets/Air-quality/Research-Data/20171212TriCitiesOzonePrecursorStudy>, last visited January 26, 2021.

<sup>16</sup> WAC 197-11-444(1)(b)(iii).

<sup>17</sup> Climate Change - Washington State Department of Commerce <https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/climate-change/> last visited January 26, 2021.





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consumption, smart growth, pollution prevention and designed for environment.<sup>18</sup> Land use planning that encourages the use of transit, walking and cycling, and the creation of mixed-use urban centers can improve air quality by reducing automobile trips and congestion. The EIS should analyze these techniques as potential mitigating measures.

## Agricultural and Rural Land

The relationship to existing land use plans is an element of the environment.<sup>19</sup> The area proposed to be included in the urban growth area includes designated agricultural lands of long-term commercial significance and rural lands.<sup>20</sup> Converting these lands to urban development will be significant adverse impacts requiring the preparation of an EIS.

The City of Pasco claims that the lands within the proposed UGA expansion are not designated as agricultural lands of long-term commercial significance. This claim is without foundation.

Currently, Franklin County designates most of the land in the proposed UGA expansions as agricultural lands of long-term commercial significance.<sup>21</sup> The *Franklin County Growth Management Comprehensive Plan* on page 93 says:

“In Franklin County agricultural lands of long-term commercial significance are soil classification 1-3 according to the Land Capability Classification of the USDA Soil Conservation service. Further, the County’s Prime, Unique and of State and Local Significance soils as generally shown and mapped by the Franklin Conservation District on Map 8, are also described as agricultural lands of long-term commercial significance in Franklin County.”

Map 8 is on page 96, is entitled Agricultural Lands, and shows large areas included in the proposed UGA expansion as Agricultural Lands.

Furthermore, in a new report, the American Farmland Trust has identified much of the UGA expansions as “nationally significant agricultural land.”<sup>22</sup> Nationally significant agricultural land is a

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<sup>18</sup> US Environmental Protection Agency, Office of Solid Waste and Emergency Response, 2009 “Opportunities to reduce greenhouse gas emissions through materials and land use management practices” accessed at: <https://www.epa.gov/sites/production/files/documents/ghg-land-materials-management.pdf>

<sup>19</sup> WAC 197-11-444(2)(b)(i).

<sup>20</sup> *Franklin County Growth Management Comprehensive Plan* p. 96 (Agricultural Lands map) (Adopted Feb. 27, 2008 Resolution Number 2008-089) accessed on January 26, 2021 at: [http://www.co.franklin.wa.us/planning/documents/2008ComprehensivePlan-Entirepdfwebsite\\_000.pdf](http://www.co.franklin.wa.us/planning/documents/2008ComprehensivePlan-Entirepdfwebsite_000.pdf) and on the data CD enclosed with the paper version of Futurewise’s letter to the Franklin County Planning Commission (Dec. 17, 2020) with the filename: “2008ComprehensivePlan-EntirepdfwebsiteFranklin Cty.pdf.”

<sup>21</sup> *Franklin County Growth Management Comprehensive Plan* p. 96 (Agricultural Lands map) (Adopted Feb. 27, 2008 Resolution Number 2008-089).

<sup>22</sup> American Farmland Trust, *Farms Under Threat Washington* webpage accessed on September 30, 2020 at: <https://csp-fut.appspot.com/> and the map of nationally significant farmland is on the data CD enclosed with the paper version of Futurewise’s letter to the Franklin County Planning Commission (Dec. 17, 2020) with the filename: “ATF National Significant Farmland North of Pasco.pdf.”





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designation for farmland that is best suited for long-term cultivation and food production.<sup>23</sup> It was developed by the *Farms Under Threat* study in consultation with experts.<sup>24</sup> The report exposes the threats facing working farms and policy efforts, state by state, to slow the pace. The U.S. Department of Agriculture Natural Resources Conservation Service identifies 2,898.6 acres, 83.5 percent of the proposed UGA expansions, as prime farmland and farmland of statewide importance.<sup>25</sup> These are U.S. Department of Agriculture classifications for highly productive farmland.<sup>26</sup> As the above quotation shows, they are also designated by Franklin County as agricultural lands of long-term commercial significance.<sup>27</sup> Most of the land in the UGA expansion alternatives are also currently used for agricultural production.<sup>28</sup>

“Since before statehood, fertile soils, available irrigation water, sunny skies and long summer daylight hours have made agriculture a cornerstone for economic development” in Franklin County.<sup>29</sup> The American Farmland Trust estimates that between 2001 and 2016, 97,800 acres of agricultural land was converted in Washington State “enough land to generate \$61 million in annual revenue.”<sup>30</sup> Given the economic value of agriculture to the City of Pasco and Franklin County and the productivity of the farmland in the proposed UGA expansions, we urge the county to prepare an EIS analyzing and mitigating the impacts of the proposed UGA expansions.

In addition to these important policy reasons for not paving over farmland, the Growth Management Act (GMA) prohibits including agricultural lands of long-term commercial significance within an UGA unless the county or city has a purchase or transfer or development rights program adopted and

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<sup>23</sup> Julia Freedgood, Mitch Hunter, Jennifer Dempsey, and Ann Sorensen, *Farms Under Threat: The State of the States* p. 64 (American Farmland Trust: 2020) last accessed on January 26, 2021 at: [https://s30428.pcdn.co/wp-content/uploads/sites/2/2020/09/AFT\\_FUT\\_StateoftheStates\\_rev.pdf](https://s30428.pcdn.co/wp-content/uploads/sites/2/2020/09/AFT_FUT_StateoftheStates_rev.pdf) and on the data CD enclosed with the paper version of Futurewise’s letter to the Franklin County Planning Commission (Dec. 17, 2020) with the filename: “AFT\_FUT\_StateoftheStates\_rev.pdf.”

<sup>24</sup> *Id.*

<sup>25</sup> *Soils Pasco Proposed Urban Growth Area (UGA) Expansion June 2020* on the data CD enclosed with the paper version of Futurewise’s letter to the Franklin County Planning Commission (Dec. 17, 2020) with the filename: “Soils Pasco Proposed UGA Expansion June 2020.xlsx;” *Soil Map—Franklin County, Washington (Pasco UGA Expansion NW Part)* pp. 1 – 23 (6/4/2020) on the data CD enclosed with the paper version of Futurewise’s letter to the Franklin County Planning Commission (Dec. 17, 2020) with the filename: “Pasco NW UGA Expansion Soil\_Map.pdf;” and *Soil Map—Franklin County, Washington (Pasco UGA Expansion NE Part)* pp. 1 – 28 (6/4/2020) on the data CD enclosed with the paper version of Futurewise’s letter to the Franklin County Planning Commission (Dec. 17, 2020) with the filename: “Pasco NE UGA Expansion Soil\_Map.pdf.”

<sup>26</sup> 7 Code of Federal Regulations (CFR) § 657.5(a) & (c).

<sup>27</sup> *Franklin County Growth Management Comprehensive Plan* p. 93, p. 96 (Agricultural Lands map) (Adopted Feb. 27, 2008 Resolution Number 2008-089).

<sup>28</sup> *Soil Map—Franklin County, Washington (Pasco UGA Expansion NW Part)* p. 1 (6/4/2020) and *Soil Map—Franklin County, Washington (Pasco UGA Expansion NE Part)* p. 1.

<sup>29</sup> *Economic Development Plan Franklin County, Washington Res. 2016-211* p. 5 last accessed on January 26, 2021 at: [http://www.co.franklin.wa.us/planning/documents/2016EconDevPlan\\_May\\_2019.pdf](http://www.co.franklin.wa.us/planning/documents/2016EconDevPlan_May_2019.pdf) and on the data CD enclosed with the paper version of Futurewise’s letter to the Franklin County Planning Commission (Dec. 17, 2020) with the filename: “2016EconDevPlan\_May\_2019.pdf.”

<sup>30</sup> American Farmland Trust, *Farms Under Threat: The State of the States Agricultural Land Conversion Highlight Summary Washington* p. \*2 (2020) last accessed on January 26, 2021 at: [https://storage.googleapis.com/csp-fut.appspot.com/reports/spatial/Washington\\_spatial.pdf](https://storage.googleapis.com/csp-fut.appspot.com/reports/spatial/Washington_spatial.pdf) and on the data CD enclosed with the paper version of Futurewise’s letter to the Franklin County Planning Commission (Dec. 17, 2020) with the filename: “Washington\_spatial.pdf.”





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implemented for those lands and they are protected as agricultural lands of long-term commercial significance.<sup>31</sup> We were unable to find a purchase or transfer of development rights program or agricultural comprehensive plan designation or zone in either the Pasco Municipal Code or the proposed comprehensive plan. So it is illegal to include the agricultural lands of long-term commercial significance in the UGA expansion.

### Priority Habitats and Species

The Washington State Department of Fish and Wildlife lists priority species and habitats and provides technical assistance on the designation and protection of these habitats. Plants and animals, habitats for and numbers or diversity of species of plants, fish, or other wildlife, unique species, and fish or wildlife migration routes are all elements of the environment.<sup>32</sup> The conversion of agricultural and rural land to urban development will adversely impact these habitats. The expansion of impervious surfaces will also harm aquatic habitats. The designation and conservation of priority habitats and species are important to residents who hunt, fish, and view wildlife. Outdoor recreation is estimated to contribute \$81,959,000 to the Franklin County economy, generating 1,114 jobs and paying \$5,942,000 in state and local taxes.<sup>33</sup> Protecting fish and wildlife habitats and rivers and streams will help maintain the economic benefits of outdoor recreation for Franklin County. So an EIS should be prepared to identify and mitigation the impacts of the UGA expansion on fish and wildlife habitats.

### Native Plants

Plants and habitats for and numbers or diversity of species of plants and unique species are all elements of the environment.<sup>34</sup> The conversion of agricultural and rural land to urban development will adversely impact these habitats. Native plants of the Columbia Basin have ecological, aesthetic, and historical value. The Benton-Franklin Conservation District Heritage Gardens of the Columbia Basin and Washington Native Plant Society educate the public on the value of native plants and help prevent the conversion and degradation of these local resources and wildlife habitat. “Unconverted areas are threatened by a negative feedback loop that combines disturbance, invasion of noxious weeds and more frequent fires. When fragile soils are disturbed and cryptobiotic soil crusts are removed, annual invasive species such as cheatgrass become established.”<sup>35</sup> The communities of native plants and wildlife that make up the iconic Columbia Basin shrubsteppe have been severely diminished. Today, less than 20% of Eastern Washington’s historic shrubsteppe remains, and much of it is degraded, fragmented, and/or isolated from other similar habitats. Many areas with deep-soil shrubsteppe (supporting Wyoming big sagebrush) were the first to be converted to agriculture. In addition, non-native grasses such as cheatgrass often dominate existing shrubsteppe, which eliminates most of the native shrub cover through altered fire cycles.<sup>36</sup> We recommend that an EIS be

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<sup>31</sup> RCW 36.70A.060; *Futurewise v. Benton County and the City of Kennewick and the Kennewick Industrial District, LLC*, Eastern Washington Region Growth Management Hearings Board Case No. 14-1-0003, Final Decision and Order (Oct. 15, 2014), at 30 – 36 of 38.

<sup>32</sup> WAC 197-11-444(1)(d).

<sup>33</sup> Tania Briceno & Greg Schundler, *Economic Analysis of Outdoor Recreation in Washington State* p. 83 (Earth Economics: 2015) accessed on January 26, 2021, at: <https://www.tre.wa.gov/wp-content/uploads/Willhite.pdf>

<sup>34</sup> WAC 197-11-444(1)(d).

<sup>35</sup> Washington Native Plant Society, <https://www.wnps.org/ecosystems/shrub-steppe> last visited on January 26, 2021.

<sup>36</sup> Washington State Department of Fish and Wildlife Habitat Conservation or Species and Ecosystems Science, <https://wdfw.wa.gov/species-habitats/ecosystems/shrubsteppe#conservation> last visited January 26, 2021.





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prepared to consider the impacts of the UGA expansion on areas designated in the Department of Natural Resources Washington Natural Heritage Program for endangered, threatened, and sensitive plant species.<sup>37</sup>

Thank you for considering our comments. If you require additional information, please contact Alison Cable at telephone 206-343-0681 x114 and email: [alison@futurewise.org](mailto:alison@futurewise.org) or Tim Trohimovich at telephone (206) 343-0681 Ext. 102 and email: [tim@futurewise.org](mailto:tim@futurewise.org).

Very Truly Yours,

Alison Cable

**Tri-Cities Program Manager**

Tim Trohimovich, AICP

**Director of Planning & Law**

cc: Mr. Rick White, City of Pasco Community & Economic Development Director via email at: [whiter@pasco-wa.gov](mailto:whiter@pasco-wa.gov)

Enclosure

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<sup>37</sup> Washington Natural Heritage Program Element Occurrences: [https://data-wadnr.opendata.arcgis.com/datasets/34fb23d474d14a55bfbf670d065209c3\\_2](https://data-wadnr.opendata.arcgis.com/datasets/34fb23d474d14a55bfbf670d065209c3_2), last visited January 26, 2021.

