



September 4, 2018

Franklin County Planning Department  
502 W. Boeing Street  
Pasco, WA 99301

Attention: Nicole Stickney, Planner

Subject: 2018 Franklin County Comprehensive Plan Periodic Update –  
Pasco and Connell Proposed Urban Growth Area Expansions

We have reviewed the applications by the cities of Pasco and Connell to expand their respective Urban Growth Area (UGA). We understand that additional materials and analysis are forthcoming for these applications. Based on the materials provided thus far, we have the following comments.

The Connell proposal to expand its UGA boundary by approximately 80 acres consisting of two parcels is located near US 395 at Milepost 56.7 and its intersection with Lind Road. US 395 is a limited access highway and all access rights have been acquired. No private direct access is allowed to SR 395. The application materials state that the applicant wants to pursue the development of a future race track to be served by city utilities and services.

The Pasco proposal to expand approximately 4,800 acres to its UGA generally includes those parcels along its northern boundary to accommodate future growth projections and an estimated 10,000 new dwelling units, additional schools, commercial centers and possibly a future regional soccer complex.

- As currently stated in the application, potential transportation impacts will be addressed by capital projects, concurrency requirements and traffic impact fees. Transportation estimates and resulting level of service impacts are provided for the first six years in the application while planning and analyses for the twenty year planning period is required, and needs to include state highways. The draft documents do not mention traffic impact fees to pay for state system improvements.
- It is our conclusion that buildout of the current vacant and re-developable lands within the existing Pasco urban growth area will cause the interchanges on Interstate 182 to fall below acceptable levels of service as the local connections to the state system are already suffering. This will result in significant adverse impacts that warrant further study and analyses of alternatives and mitigation options

through the preparation of an Environmental Impact Statement per the Washington State Environmental Policy Act, RCW 43.21C. 031.

- The application references a draft City of Pasco Feasibility Traffic Study for Interchanges (Draft No. 2, January 2017) that pertains to Interstate 182 through Pasco. This report is also mentioned in the SEPA checklist, page 15, and implies that future interchange improvements are already planned to address current traffic needs as well as future residential and commercial development. We want to note that the Washington State Department of Transportation (WSDOT) participated in the analysis but that WSDOT has not adopted the report findings or recommendations, including those recommended for further study.

We strongly support efforts that promote multi-modal transportation systems and address impacts on a regional level and not defer to future projects. The future adoption of comprehensive plan and zoning designations of specific parcels adjacent to, or in the immediate vicinity of, a state highway should take into account the type of access control and capacity on that state highway. As final land use plans and subsequent developments are proposed, they will be subject to review for their impacts to the state system and are disclosed in corresponding State Environmental Policy Act documents and determinations.

We request that you consider adding WSDOT to the draft County-wide Planning Policy I (1)(C) to promote coordination on transportation regional priorities in addition to the cities and Franklin County. We emphasize the importance of implementing County Wide Planning Policy III (16) that promotes orderly development and provision of public services, which by definition, includes state highways. We suggest that a possible expansion of these policies to set the framework for how to allow interim or phased development of and within the UGAs to better plan for the supporting capital facilities.

We support your efforts and look forward to continued discussions. Thank you again for the opportunity to participate and provide comments. If you have any questions regarding these comments, please contact John Gruber at (509) 577-1636.

Sincerely,



Paul Gonseth, P.E.

Planning Engineer

PG:jg/df

cc: Rick White, City of Pasco  
Kara Shute, Area 3 Maintenance Superintendent  
Todd Daley, Traffic Engineer