

## EXHIBIT C

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June 15, 2020

130 Terrace Drive

Pasco, WA99301

Via email

Comments on the City of Pasco Comprehensive Plan: Non-project Draft  
Environmental Impact Statement (DEIS) (May 2020)

To: Rick White, Director City of Pasco Community & Economic Development  
Department

Jacob Gonzalez, Senior Planner, Department of Community and Economic  
Development, City of Pasco

Gentlemen,

I am providing comments on the above referenced City of Pasco Comprehensive  
Plan DEIS. I previously commented on the Scoping plan for this DEIS by  
communication and email dated November 18, 2018. My previous comments  
were essentially ignored, and unfortunately the DEIS was not written to reflect  
the reasonable actions and alternatives that I provided in those scoping  
comments.

Therefore I am incorporating by reference, and remaking all the comments that  
were included in my earlier scoping comment letter. In addition to my previous  
scoping comments which I restate by reference and attach, I offer the following  
sincere comments.

The City of Pasco should recognize that its comprehensive planning process and extension of Urban Growth Boundaries will have far reaching impacts and it must do the job properly now or the residents of the Tri-Cities and Franklin County will permanently suffer the impacts of poor planning. Pasco has a real opportunity to reinvent itself much as the City of Seattle did when it rebuild after the late 1880 fires, but this DEIS essentially ignores those opportunities by failing to adequately analyze reasonable alternatives to the 2 action alternatives that are so inadequately analyzed in this DEIS.

In light of the significant detriment to the opportunity for public review and comment of this DEIS which has been created by the Corona virus pandemic, I request that the review and comment period for the DEIS be extended for at least an additional 60 days. In light of the momentous decisions that will be based on this EIS process, and the irreversible impacts it will have on Franklin County residents and all of the Tri-Cities residents, there should be much more open publicity provided in local media, of the issuance of a DEIS and a request made for public comment.

The currently issued DEIS is so woefully inadequate in its analysis of environmental and socioeconomic impacts of the proposed action and alternatives that it must be withdrawn, and rewritten to be an adequate DEIS. It should then be reissued for public comment as a revised DEIS.

The DEIS appears to be written in such a manner to support a predetermined decision to advance an expansion of the Urban Growth Boundaries in the north-west area of West Pasco and Franklin County. In doing so however both of the action Alternatives analyzed for this expansion seriously fail to address the impacts on the current future residents in this area that will occur when up to almost 50,000 more people are living in the expanded West Pasco area.

There is simply no reasonable analysis and presentation of the traffic impacts that will be created by dense city development in this area. (Note that even the Low Density range for the city's residential zones is 2-5 houses per acre, compared to the much lower density of less than 1 house per acre that is required in the County areas of northwest Franklin County that would be absorbed into the Urban Growth Boundaries of Pasco and therefore would be eligible for city water and/or sewer services.

As I noted in my scoping comments, a reasonable analysis of traffic impacts upon the 2 major north to south roadways that connect west Franklin county to the rest of the Tri-Cities through Interstate 1-182, (i.e. the Road 68 and Road 100/Broadmoor thoroughfares, and their associated I-182 interchanges, simply are inadequate, and cannot be reasonably expanded or impacts mitigated to handle the additional traffic that will be created by up to 50,000 additional residents in this small area of the city.

In section 3.1.2 of the DEIS, the analysis of traffic impacts are completed in less than 18 lines on less than one full page. There is no adequate discussion or analysis of traffic impacts, presented with facts and figures that were obtained in a comprehensive transportation analysis of the proposed alternatives, as would be reasonably expected and necessary in an adequate DEIS. There is no discussion of the number of additional traffic lights that will be installed on Road 100, or the impacts on driving time on Road 68 and Roads 100, whether because of increased traffic, increased number of traffic signals, or because of reductions in the speed limit of Road 100 in the area of the county that will be incorporated in the Urban Growth Act boundaries. There is no discussion of leaving these two roads as higher speed (50 mph as currently allowed in the county), north-south transportation corridors in west Franklin County, and requiring new feeder roads along both sides of the higher speed corridors, feeding into a more limited number of signaled intersections.

The extent of the traffic discussion in the DEIS is essentially a few words that say Alternatives 2 and 3 could result in substantial traffic volumes and significantly

increase on Broadmoor . Nowhere in the DEIS does the city present an analysis of the actual terrible traffic conditions that are reasonably expected to occur from the proposed UGA expansion. This inadequate and woefully incomplete discussion of traffic impacts is then downplayed by the DEIS as it states that “a portion of this traffic is expected to be contained internally due to a combination of businesses and housing planned in the same area” around the Road 100 Broadmoor area. An EIS is not adequate when it is based upon mere speculation or wishful thinking. In this DEIS, the City must recognize that it is an integral part of a larger metropolitan area. The location of major services, retail centers, artistic and convention centers, medical centers, and industries in the Tri-Cities is fairly well established at this point. Richland represents the location of most high technology and Hanford related remediation and energy research and development activities, as well as the closest medical center to west Pasco. Kennewick is the location of the major shopping and retailing regional stores in the Tri-Cities, and is the center of Public Arts, Music and Major Conventions. Pasco, and especially West Pasco, will be a bedroom community to these activities, providing housing to these two other cities. It will not develop a self contained employment center in the Broadmoor area that could come anywhere close to providing jobs for 50,000 new residents.

Pasco will continue to be the leader in farm related and food processing industries, but those industries are located in East Pasco, and generally do not provide sufficient incomes to support the cost of residences and apartments in the West Pasco area, at least for the average agricultural or food processing worker. Thus it is pure hyperbole and wishful thinking to believe that traffic volumes will be substantially reduced by whatever local shopping/ retailing stores will develop in the Broadmoor area. The vast majority of new residents in the West Pasco area will be going somewhere else for work, major shopping, hospital care, and artistic endeavors. To the extent that any activities are developed in the West Pasco area that would mitigate west Pasco residents from traveling outside the area, they would be counterbalanced by the increased traffic created by the draw of such activities to residents from outside of west Pasco traveling to there. The presentation of traffic impacts in the DEIS is not an adequate analysis of

traffic impacts. The public has no idea of the horrendous traffic impacts that will result from the planned development under Alternatives 2 and 3, and by failing to adequately analyze and discuss these reasonable foreseeable and expected impacts, the DEIS is inadequate.

While the City of Pasco may not be interested in my comments upon traffic, it should have been more responsive to the scoping comments from the State Department of Commerce and State Department of Transportation. Consider for example the comment by Paul Gonseth of the State of Washington Department of Transportation at comment no 18 in the DEIS which states

“WSDOT previously commented to Franklin County regarding the City of Pasco proposal to expand approximately 4,800 acres to its UGA to accommodate future growth projections. **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 (1-182) to fall below acceptable levels of service as the local connections to the state system are already suffering. The state highways are an integral part of the transportation network in the Pasco area.** The Determination of Significance and SEPA Notice identifies three alternatives and **we conclude that all three alternatives will have negative impacts to the state transportation system which includes the Tri-Cities Airport. The Environmental Impact Statement will need to complete a land capacity and traffic analysis for both the current and future conditions for each alternative. The analysis needs to include the state transportation system as part of the study. Special attention should be focused on State Route (SR) 395 and 1-182. The EIS should show what the proposed land use changes are and where they are located. The current and future traffic analysis must not include any improvements to the state system without agreement from WSDOT.” (Emphasis added)**

However the DEIS does not include the analysis requested by the DEIS. It contains only a superficial discussion based in part upon wishful thinking. Nor do the

Mitigation discussions in the DEIS adequately set forth realistic mitigation steps, or plan for their completion.

If the DEIS had adequately discussed these horrendous transportation impacts that will result from Alternatives 2 and 3, the document writers would have understood why I made the request that additional alternatives areas be considered for future growth of the GMA boundaries. Given the almost impossible opportunity to mitigate traffic adverse impacts in the urban growth boundary extensions proposed in alternatives 2 and 3, it becomes much more reasonable to consider an alternative extension of urban growth boundaries in the Northeast Pasco and Franklin county areas to the east of Highway 395. This area has lesser valued farming activities, it has easier connections to Highway 395 and Highway 14, and thereby access to I- 182. And while the DEIS uses wishful thinking for alternatives 2 and 3, to suggest that co-development of business and residences may help reduce traffic impacts in the Broadmoor area, the proposed Northeast Pasco expanded growth management area is an area that would actually result in closer combination, or adjacent location, of residential development with the major industrial and agricultural food processing industries of Pasco. These activities employ thousands of Pasco residents and are the heart blood, and future, of the Pasco economy. Due to lower land prices, the Northeast area would allow residential development to occur that would be more affordable to the average worker in these industries, compared to the areas analyzed in alternatives 2 and 3 of the DEIS. And the West Pasco area would not suffer the terrible traffic and related socioeconomic adverse impacts that Alternatives 2 and 3 will produce.

Pasco has acknowledged that additional growth in the northeast area outside the city limits of Pasco is reasonable to consider by entering into a Memorandum of Agreement with the Colville Indian tribe to cooperate in development of a 500 area parcel near that area. Why not consider in the DEIS, an alternative that would be a real economic benefit to the thousands of Pasco residents or future residents who currently or in the future, work in those industries?

A reasonable analysis of traffic impacts created by alternatives 2 and 3 would also support my request for a reduced area of expansion of the GMA area under current alternative 3. My proposal was to analyze a smaller extension of the GMA area that terminated on the south side of the current portions of existing Dent and Clark roads that run in a west to east direction. The line created by these current roads would be extended all the way to the Columbia River on the West end, and to Highway 395 on the east end. By reducing the size of the GMA extension in Alternatives 2 and 3, the County lands to the north of Dent/Clark roads would be preserved for agricultural use, or at most, for county suburban residential development that would utilize individual well and septic systems, allowing for less than 1 house per acre. This action would preserve natural resources, such as farmland and natural vegetation areas. Just as importantly, it would reduce future traffic impacts on the overloaded Roads 100/Broadmoor, and Rd. 68 corridors.

An additional reasonable alternative is to change the zoning areas within the existing Pasco city limits to encourage redevelopment of the current aging and in some cases deteriorating portions of the central city. This type of action is what the city of Seattle did after it was hit by massive fires in the late 1800s, and it was able to rebuild itself into a great city. It would be wonderful if Pasco considered redeveloping itself into a great city, rather than creating another overcrowded, congested, and traffic snarled bedroom community like those of many areas surrounding the Seattle area. But the DEIS contained no reasonable analysis of this alternative suggested in my scoping comments, and it is therefore fatally flawed for this reason as well.

Please note that the scoping comments of the State of Washington Department of Commerce also support my three alternatives discussed above. The Department of Commerce in its scoping comments by Will Simpson as contained at comment 21 of the DEIS list of Scoping comments stated

“The City should reevaluate the preliminary land capacity analysis conducted by Franklin County and determine how much capacity is available within the existing

UGA. The final land capacity analysis should clearly identify assumptions about development, redevelopment, partially developed properties, lands needed for public purposes, and densities. **After identifying projected needs for population and employment growth, the land capacity analysis will establish whether changes are needed to the UGA boundary. At this point other factors such as the cost of capital facilities or transportation infrastructure may require further consideration of different UGA configurations.** (Emphasis added)”

Unfortunately no reasonable analyses of transportation infrastructure, or existing land capacity within city limits, with alternative zoning criteria that would support redevelopment at increased densities, is included in the DEIS.

Another area where the DEIS is fatally flawed is in its discussion of recreational needs, and park planning under alternatives 2 and 3, particularly waterfront parks. My scoping comments on this point were not even included in the DEIS discussion of scoping comments!

It is somewhat amazing that the city is developing a comprehensive plan to locate almost 50, 000 additional citizens in West Pasco/West Franklin county, but it sees no need to currently analyze and plan for additional parklands, especially parks providing access to the Columbia River for boating, fishing and swimming. The areas of river access that are located in the West Pasco area north of I-182, and that are discussed in the DEIS, are all portions of the Corp of Engineers wetland preservation and natural wildlife areas. These areas will not provide access for boating and swimming. Yet 50, 000 new souls will look down upon the Columbia River, and ask themselves why city of Pasco managers, planners and council members, decided to increase city size by 50,000 people and did not plan for, and did not take action to acquire currently undeveloped lands for a Northwest Pasco riverfront park. These people will be constrained from access current parks in south Pasco by the horrendous traffic conditions that will be created by the development of this area. They will be impeded in being able to travel to these



existing parks, and neighbors of those parks will be adversely impacted by the additional traffic in their residential areas, created by the efforts of these new 50,000 citizens to access a riverfront park.

More importantly the new residents of West Pasco will feel like second class citizens as they yearn for access to the river, and remember the large open spaces that currently exist as farmlands along the river in the Dent/Burns/Harris road areas of West Pasco, and see them developed entirely for residential uses rather than being planned for now as parks, and acquired for public park purposes.

The DEIS suggest that additional park lands may be considered in the future, as future lands are developed, **but that is exactly the opposite of Appropriate Comprehensive Planning.** The need for large city parks ( and make no mistake, the proposed expansion in west Pasco/Franklin County under alternatives 2 and 3, is the equivalent of a new large city) is one of the very most important actions that comprehensive planning can produce. Again, the experience of the city of Seattle is instructive. In its formative days, the city hired the Olmstead Brothers of New York, to design a plan of parks for the young frontier city. Today, many of the most treasured parks in Seattle are the result of the early effective planning done by the Olmstead Brothers, and the acquisition of such lands by the city of Seattle. I am confident that the City of Pasco planners can come up with a reasonable waterfront park plan to consider in the DEIS, proposing acquisition of some of the current agricultural lands that are included in the current city limits and proposed GMA expansion areas. Setting aside these lands for parks in this comprehensive plan now, is the appropriate comprehensive planning action. Analyzing the need for parklands and alternatives for such parks, will also provide information to city managers and council members that would cause them to recognize that leaving park planning decision to the future is a self-defeating activity. Once land is developed for other uses, the cost of acquiring the land and turning it into a park, especially a riverfront park, will skyrocket. Given the ability of developers to pay a very small fee instead of setting aside lands for parks, the parks will never be developed. And each individual land development proposal will be too small to justify the consideration of a major city riverfront park for

West Pasco. That is why the full and complete analysis of alternatives must include a major riverfront park for West Pasco, and it must be included now in this reissued DEIS.

Such an analysis of park needs and costs for both a waterfront park, and for local neighborhood parks, would also help the city to understand whether its current alternative fee schedule, which it accepts for no park development by land developers, is reasonable. Based upon current land prices in the West Pasco area, it appears that the fee charged in lieu of developing community parkland is far too low to allow the city to develop such parks in the future.

Failure to include a reasonable analysis of park needs is another fatal flaw in the DEIS.

Finally, I refer the city to the complete comments in my earlier Scoping comment letter and email of November 9, 2018 to Rick White, City of Pasco, which is incorporated herein by reference and attached.

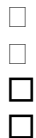
I make these comments in good faith, knowing that the City of Pasco can become a great city if it only dares to do so. It cannot simply respond to developers' constant desire for more raw land to cover with more and more, and denser and denser, residences. The city must look to its own best interests in redeveloping the central core of the city, locating reasonable priced new housing near the industrial and food processing areas of Pasco, and in avoiding the terrible traffic congestion that is present in the Puget Sound area, (which motivates many West-siders to want to move to Pasco). I know there are fine city planners, council members and managers who know how to develop and adequate Comprehensive Plan update, and prepare an adequate EIS. I strongly encourage them to take these comments to heart and to do so. Every citizen of Pasco, Franklin County, and the Tri-Cities, current and future, are relying upon Pasco to do an effective job today, or we all will suffer in the future.

Thank you for consideration of these comments.

Attachment: Scoping comments submitted on November 9, 2018

**Comments Scoping Plan for the Comprehensive Plan Update EIS being prepared by the City of Pasco**

ROBERT CAROSINO  
Fri 11/9/2018 11:12 AM



To:

- Rick White (whiter@pasco-wa.gov)

To: Rick White  
Community and Economic Development Director  
City of Pasco

Nov. 9, 2018

In response to Scoping Notice for the EIS which the city of Pasco is planning to prepare for its Comprehensive Plan Update and possible expansion of its Urban Growth Area (UGA), the following DEIS Scoping comments are provided:

1) The range of alternatives is clearly inadequate as there clearly are other reasonable alternatives which merit full and complete analysis in this DEIS. The City of Pasco is already on notice from the State Dept. of Transportation and other commenters, the expansion within the current city limits that is already reasonable foreseeable will lead to traffic in excess of interchange capacities at Roads 68 and Road 100 interchanges. Unfortunately there is simply no way to adequately mitigate the horrendous traffic jams and unsafe traffic conditions which would be created by the proposed expansion of the Urban Growth Boundary in the area North of the existing City Limits in West Pasco as currently proposed by the Pasco alternatives. The Freeway I-182 access points simply cannot handle the proposed 55,000 additional residents which would be added to that area by development of this area under the City's proposed Comprehensive Plan updates and UGM boundary expansions in the area to the North of the West Pasco city limits. Nor would the main city and county feeder routes to these over-congested interchanges be able to be adequately expanded to handle the additional traffic.

This factor alone mandates that an adequate EIS will need to consider other alternatives that do not provide for expansion of the UGA in the area to the North of the West Pasco city limits.

Three additional alternative actions (a, b and c below), that would provide appropriate and reasonable alternatives, are the following, and must be fully analyzed in any DEIS meeting the requirements of SEPA:

a) Analyze in full detail an alternative providing for expansion of the city in an different area from west Pasco. This alternative would provide for expansion of the UGA and the city, to allow residential development in the area to the EAST of the current city limits. This area is less valuable farmland, it has potential to for access to main highways (Highway 395 to the West, and highway 14 running east to west, that are more amenable to access by thousands of more people, and therefore would not create as excessive an adverse traffic impact on the interchanges in West Pasco. It would also avoid the unreasonable intermixing of high density growth with low density growth which the city's proposed expansion of the UGA in the area north of west Pasco would create.

The area to the East of the city of Pasco has substantial undeveloped land that could be easily used for residential development if the city provided utilities,( just as the city would need to provide utilities to the area North of west Pasco under its proposed alternatives). The East Pasco alternative would have much better access to transportation corridors and the transportation corridors in that area can be more easily expanded if required, as the land around the major roads are primarily farmland and level ground. Expansion of the residential development in that area east of Pasco would also provide housing that is more closely located to the employment hubs of the city of Pasco, thus reducing that transportation impacts that would be created by any additional residential population in the west Pasco area of the city, thereby also mitigating impacts on transportation corridors.

b) The second full new alternative that should be considered in the DEIS is a change in the city comprehensive plan to allow re-development of the lands within the existing city limits of Pasco to allow for high density residential development within the existing city limits. Many areas within the central core of the city of Pasco are in need of redevelopment due to age and condition, and a greater population could be easily accommodated by redevelopment with increased density in the existing city limits of Pasco, particularly in the area of the city to the south of Road 68 and West of I-182 , to the Columbia River on the south, comprising the old central core of Pasco. By channeling development within that area, it would allow better access to major transportation corridors by the 3 interchanges on I-182 to the east of Rd 68, as well as access to other major transportation corridors connecting Pasco its industrial center, highways 395, and to cities to the south of Pasco. There are two bridges from this area of Pasco to Kennewick that are available, and these provide access to the highway 240 freeway running on the south side of the Columbia River through Kennewick. This alternative would lead to much lower over-congestion on the Road 68 and Rd 100 interchanges at I-182. It would also create the necessary density in a compact which would allow greater use of mass transportation alternatives.

Recall that the State Department of Transportation has already advised the city, that with the reasonably foreseeable development of current lands within the existing City limits in the west Pasco area, the two west Pasco I-182 interchanges will be burdened far beyond capacity. It is unconscionable to impose upon the residents of west Pasco, and those of northwest Franklin County in the area north of the current city limits, a proposal to include in this area even more residents that would require access through these two already over-congested freeway access points. Due to the topography of west Pasco, and existing development of the areas around the existing interchanges, there is no reasonable way to mitigate the significant adverse transportation and quality of life impacts from additional development in west Pasco. No reasonable person living in those areas or moving into those areas, would be in favor of allowing such additional excessive development in that area, except land owners and developers, who have no concern for the long-term future adverse traffic and socio-economic impacts that residents would have to endure. The catastrophic traffic jams and unsafe traveling conditions that the city's expansion proposals would create, are clearly unacceptable and significantly adverse. It is clearly inadequate for the city to only propose expansion in the west Pasco (and the county area to the north of west Pasco) and not consider expansion in other areas of Franklin county. To suggest, as city planners have done in previous public hearings, that other cities and areas such as Seattle and King County have worse traffic conditions, and traffic "really is not that bad by our numbers" is not an acceptable response, nor one which gives any solace to residents of west Pasco or the county lands to the north. It is not the desire of the residents of west Pasco or west Franklin County to have roadway traffic congestion become more and more like the horrible traffic faced in the Puget Sound area. But it appears to be acceptable to the city.

Furthermore it would be a catastrophe for the city of Pasco to effectively take over land planning in the area of west Franklin county covered by the city's proposed alternatives, as the residents would be effectively disenfranchised from having the ability to control their own destiny. Due to a poorly written state law, the county residents would in effect have land use planned performed by the city, even though those residents remain residents of the county.

c) The City's own proposed alternative growth target alternatives should be modified to stop the northern expansion of the UGA and limit the expansion of city limits under the city's current alternatives, to a northern city and UGA boundary line being established that is based upon the East to West leg of current Dent Road. This East to West line of Dent road would be used to create a northern boundary line that would run to the Columbia River on the west end, and Columbia River Road on the east end, using the same east to west line followed by Dent road. This smaller expansion of the UGA will minimize the area that can be developed for high density residential use. Providing city utilities to the county lands to the north of the proposed Dent road boundary line will only encourage excessive higher density development, creating unreasonable traffic impacts, and should not be allowed. High density development to the north of that boundary line would also create significant adverse impacts to the human environment and socio-economic impacts to current residents of the area of Franklin county north the current city limits, who have built suburban residences on large (acre size or more )

lots, as part of a desire for suburban county living. The city plan would create a hop-scotch pattern of higher density development contiguous to and within areas of west Franklin county that under County standards require large lots, and would adversely impact current residents with all the detrimental environmental, socio-economic, and traffic impacts which that higher density development entails.

This alternative should also provide for a reduction in planned density in the north one-half mile segment of the UGA expansion area running south from the north end boundary created by the Dent road UGA line, such that it would harmonize and blend into the acre+ lots sizes existing within the County lands to the north of that point.

While the DEIS will likely find that transportation, socio-economic and quality of life impacts of this alternative on existing residents of this area are still adverse, unreasonable and unmitigable, those impacts will at least be reduced from those that would occur under the city alternatives as proposed by the city, and it is appropriate for the city to descope its proposal now at the scoping phase, rather than analyze a clearly inadequate alternative.

3) The City's comprehensive plan update is woefully inadequate in its planning for future park and river access needs of the huge new population which it proposes to be located within the west area of the existing city boundaries, and within the expansion area proposed by the UGA expansion. It should be obvious to the city planners that unlike the existing portions of the city located south of I-182, there are almost no city parks planned in these areas. Rather, the ephemeral and inadequate land development fee for parks, is referred to the city's existing environmental documentation, as the way that future park needs would be met. Essentially the city is saying that it is not going to comprehensively plan for development of parks, but that will be left to the future, when the collected development funds will clearly be inadequate to purchase developed land.

The city has been very fortunate that in the major portions of the city developed to date, i.e. those that are south of I-182, access to the Columbia River is available at many locations due to Corp of Engineers ownership of substantial shore lands within the city, and those shore lands have been developed into parklands. The Corp of Engineers does not have similar substantial (wide unflooded land ownership) in the areas of west Pasco north of I-182, and the DEIS must consider the acquisition of river shore for parklands before it is developed for residential use. There are several farmlands available in the areas of Harris Road to Burns Road to Dent roads, (Burns and Kohler lands along the river are currently for sale) which the city, if it is truly interested in massive residential development of north-west Pasco, should be acquiring AT THIS TIME, for parklands.

Rivershore acquisitions should be analyzed in this DEIS and planned now as part of the comprehensive planning need for city human-use infrastructure and parkland and river access. The 55,000 additional residents foreseen by the city in its expansion plans, are not going to be satisfied with such inadequate planning that Pasco only provides for the residential development without obtaining the land necessary for municipal riverfront parks. And Pasco

will again become the laughing stock of the Tri-Cities, as both Kennewick and Richland have substantial public Columbia River access throughout their cities, but Pasco even while it should be following modern comprehensive planning requirements, will not. There are state grants and matching funds programs which can be accessed by Pasco to obtain assistance in acquiring such farmlands, but so far, I see little or no action has been taken by Pasco towards acquiring Rivershore in west Pasco. And of course the cost of acquiring these lands will be substantially less if they are purchased now, before they have been converted to residential development, than if the city needs to come in years later and buy residentially platted lands, or lands with housing on them.

4) The City's initial environmental checklist documentation was also clearly inadequate in its analysis of the expansion impacts on farmlands, calling most of the lands a low quality farmlands. As farmers have told the city in their comments on the initial environmental documentation, with the advent of current irrigation techniques such as center pivot irrigation with precisely controlled watering and fertilization capabilities, the farmland to the north-west of Pasco are some of the most productive in the state. They are capable of growing and do grow an amazing variety of crops from corn, potatoes, onions, squash, wheat, alfalfa, pumpkins, to various grass crops and oil seed crops. Many years farmers in this area produce two crops per year due to the highly productive croplands. The old soil classification standards which the city relied upon, simply are no longer relevant. As the these farmers told the city in their comments, the old soil classifications did not envision the irrigation and fertilization methods that are currently used. Therefore, the city's expansion of the UGA to farmlands would have a significant adverse environmental impact on farming, and this finding must be included and mitigated in the DEIS.

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