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EXHIBIT #D

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JUN 15 2020

COMMUNITY & ECONOMIC DEVELOPMENT

June 15, 2020

Mr. Rick White, Director
City of Pasco Community & Economic Development Department
525 N. Third Ave.
Pasco, Washington 99301

Dear Director White:

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

Send via email to: whiter@pasco-wa.gov

Thank you for the opportunity to comment on the City of Pasco Comprehensive Plan Draft Environmental Impact Statement (Draft EIS). 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 in the City of Pasco.

Futurewise strongly supports the City of Pasco's decision to prepare an EIS on the comprehensive plan update including urban growth area alternatives. Preparing an EIS makes information on the impacts of the proposed alternatives available to decision makers and the public. This results in better decisions. Preparing an EIS can also speed project level environmental review after the comprehensive plan is adopted because information and analysis from the EIS can be incorporated into the environmental review documents for those actions.

However, the Draft EIS as written is not adequate and violates the Washington State Environmental Policy Act (SEPA). We have comments to improve the Draft EIS so that it complies with the minimum requirements of SEPA.

In addition, WAC 197-11-070(1) provides that:

- (1) Until the responsible official issues a final determination of nonsignificance or final environmental impact statement, no action concerning the proposal shall be taken by a governmental agency that would:
 - (a) Have an adverse environmental impact; or
 - (b) Limit the choice of reasonable alternatives.



WAC 197-11-070(1) “applies to any (1) ‘governmental agency’ (2) capable of taking ‘action’ (3) ‘[l]imit[ing] the choice of reasonable alternatives.’”¹ Choosing an urban growth area (UGA) expansion alternative will limit the choice of a reasonable alternative. So until the final EIS is issued, the City cannot choose an UGA expansion to request from Franklin County.

Factsheet (Page b)

Page b of the factsheet includes information on the availability of the Draft EIS. Hispanic or Latinx persons make up 55.1 percent of the City of Pasco’s population.² Of the population over five years of age, 50.4 percent speak a language other than English at home.³ So we appreciate and support that the Public Participation Plan for the City of Pasco 2018 Comprehensive Plan provides on page 5 that “[e]fforts will be made to provide notices in English and Spanish.”

Also, given the high percentage of the population in the City of Pasco speaking a language other than English at home, we recommend that versions of the draft comprehensive plan and the final EIS be made available in Spanish and the public participation efforts should reach out to the Hispanic and Latinx population in addition to the population as a whole.

1.5. Background information on GMA (page 2)

Please correct the last sentence on page 2. The City of Pasco and Franklin County are required to do periodic updates of their comprehensive plans and development regulations every eight years.⁴

Table 2 Existing Residential Capacity (page 5)

It would helpful to include a reference to a more detailed description of how the existing residential capacity in Table 2 was determined. The City of Pasco is also considering the adoption of legislation to allow more “Missing Middle” housing in the city which Futurewise strongly supports. We recommend that the EIS include an estimate of the increased housing capacity this legislation will create.

3.2. Comparison of Alternatives to GMA Goals (pages 13 – 16)

The GMA transportation goal discussion on page 14 does not disclose that Alternatives 2 and 3 do not have densities sufficient to support transit citywide, an important element of a multimodal transportation system. While transit is especially important to the three percent of Pasco’s occupied housing units that do not have access to a vehicle and residents of other households that are too young or otherwise do not drive, all Pasco residents and businesses benefit from increased

¹ *Columbia Riverkeeper v. Port of Vancouver USA*, 188 Wn.2d 80, 96–97, 392 P.3d 1025, 1032 (2017).

² United States Census Bureau, *QuickFacts Pasco city, Washington* p. *1 accessed on June 3, 2020 at: <https://www.census.gov/quickfacts/pascocitywashington> and enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: “U.S. Census Bureau QuickFacts_ Pasco city, Washington.pdf.”

³ *Id.*

⁴ RCW 36.70A.130(5)(d).

transportation choices.⁵ Parts of the City of Pasco have a very high proportion of households that lack access to private vehicles compared to Washington State as a whole.⁶ Public transit is particularly important in those parts of the city.

The GMA housing goal discussion on page 14 does not disclose the impacts of allowing residential uses so close to the Tri-Cities Airport and the adverse impacts this will have on the planned housing.⁷

“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.⁸ The GMA economic development goal discussion on page 14 does not disclose that Franklin County has designated most of the land in the proposed UGA expansions as agricultural lands of long-term commercial significance.⁹ The discussion does not disclose that much of this land is also irrigated.¹⁰ The Draft EIS does not disclose the economic impacts of the loss of this agricultural land of long-term commercial significance. The economic development goal discussion on page 14 does not disclose the impacts of allowing residential uses so close to the Tri-Cities Airport and the impacts of the limited expansion opportunities created by the UGA expansion and residential zoning in the vicinity of the airport.¹¹ These impacts are inconsistent with RCW 36.70A.020(5).

There is no analysis as to the consistency of the proposed comprehensive plan with RCW 36.70A.020(8), the GMA natural resource industries goal. RCW 36.70A.020(8) requires the City of Pasco to “[m]aintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands, and discourage incompatible uses.” Since most of the land proposed for the UGA expansions is designated as agricultural resource lands of long-term commercial

⁵ United States Census Bureau, Selected Housing Characteristics American Community Survey Table: DP04 p. *5 (2018) accessed on June 3, 2020 at:

<https://data.census.gov/cedsci/table?q=Rent%20by%20monthly%20housing%20costs&g=0400000US53&tid=ACSDP1Y2018.DP04&t=Housing&hidePreview=true&moe=false> and enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: “DP04 Selected Housing Characteristics Franklin Co & Pasco searchable.pdf.”

⁶ Washington State Department of Health, Information by Location (IBL) - Washington Tracking Network (WTN) Social Vulnerability to Hazards No Access to a Private Vehicle (%) map accessed on June 8, 2020 at: <https://fortress.wa.gov/doh/wtn/WTNIBL/> and enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: “2020-06-08 Pasco No Access to Private Vehicle map.pdf.”

⁷ Proposed LU-1 Future Land Use Map.

⁸ *Economic Development Plan Franklin County, Washington* Res. 2016-211 p. 5 last accessed on June 11, 2020 at: http://www.co.franklin.wa.us/planning/documents/2016EconDevPlan_May_2019.pdf and enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: “2016EconDevPlan_May_2019.pdf.”

⁹ *Franklin County Growth Management Comprehensive Plan* p. 96 (Agricultural Lands map) (Adopted Feb. 27, 2008 Resolution Number 2008-089) accessed on June 4, 2020 at:

http://www.co.franklin.wa.us/planning/documents/2008ComprehensivePlan-Entirepdfwebsite_000.pdf and enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: “2008ComprehensivePlan-Entirepdfwebsite Franklin Cty.pdf.”

¹⁰ Soil Map—Franklin County, Washington (Pasco UGA Expansion NW Part) p. 1 (6/4/2020) enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: “Pasco NW UGA Expansion Soil_Map.pdf;” Soil Map—Franklin County, Washington (Pasco UGA Expansion NE Part) p. 1 (6/4/2020) enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: “Pasco NE UGA Expansion Soil_Map.pdf.”

¹¹ Proposed LU-1 Future Land Use Map.

significance the comprehensive plan update is inconsistent with RCW 36.70A.020(8).¹² The failure to disclose this inconsistency anywhere in the Draft EIS is a serious SEPA violation.

The GMA open space and recreation goal discussion on page 15 does not disclose the impacts of converting agricultural and rural land to relatively low-density residential uses. The GMA environment goal discussion on page 15 also does not disclose the environmental impacts of converting agricultural and rural land to relatively low-density residential uses. These impacts include a loss of farmland, reduced storm water recharge to ground water, increased storm water runoff, increased greenhouse pollution, and loss of wildlife habitat on rural and agricultural land. These impacts are inconsistent with RCW 36.70A.020(9) and (10).

The GMA historic preservation goal discussion on page 16 does not disclose that the city's planning and regulations focus on known archaeological and cultural sites. 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.¹³ The predictive model shows that Pasco and the UGA expansion areas have a "high risk" and "very high risk" of cultural resources in these areas.¹⁴ Land development can adversely impact these resources and this adverse impact on actual but currently unidentified cultural resources is not disclosed. This impact is inconsistent with RCW 36.70A.020(13).

The adequacy of an EIS "is assessed under the 'rule of reason' ... which requires a reasonably thorough discussion of the significant aspects of the probable environmental consequences of the agency's decision."¹⁵ The failure to even mention the significant adverse impacts identified above and inconsistencies with the GMA goals means that the Draft EIS is not adequate.

4.1. Earth (pages 17 to 20) and Summary of Impacts by Alternative 4.2.1. Earth (page 58)

Two letters commenting on the scope of the EIS requested that the EIS examine impacts on agricultural land.¹⁶ However, the Draft EIS does not disclose that the land proposed for the UGA expansions includes 694.7 acres of prime farmland.¹⁷ This is 20 percent of the UGA expansions.¹⁸ The Draft EIS also does not disclose that UGA expansions also include 2,203.9 acres of farmland of

¹² *Franklin County Growth Management Comprehensive Plan* p. 96 (Agricultural Lands map) (Adopted Feb. 27, 2008 Resolution Number 2008-089).

¹³ Washington State Department of Archaeology and Historic Preservation, Find a Historic Place webpage accessed on June 5, 2020 at: <https://dahp.wa.gov/historic-preservation/find-a-historic-place>.

¹⁴ *Id.*

¹⁵ *Weyerhaeuser v. Pierce Cty.*, 124 Wn.2d 26, 38, 873 P.2d 498, 504 (1994) internal quotation marks and citations omitted.

¹⁶ *City of Pasco Comprehensive Plan: Non-project Draft Environmental Impact Statement* pp. 86 – 87 (May 2020).

¹⁷ Soils Pasco Proposed Urban Growth Area (UGA) Expansion June 2020 enclosed with this letter on beginning on page 17; Soil Map—Franklin County, Washington (Pasco UGA Expansion NW Part) pp. 1 – 23 (6/4/2020); Soil Map—Franklin County, Washington (Pasco UGA Expansion NE Part) pp. 1 – 28 (6/4/2020).

¹⁸ *Id.*

statewide importance.¹⁹ This is another 63.5 percent of the UGA expansion.²⁰ Together the prime farmland and farmland of statewide importance cover 2,898.6 acres and 83.5 percent of the proposed UGA expansions.²¹

Prime farmland is generally described as “land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops, and is also available for these uses (the land could be cropland, pastureland, rangeland, forest land, or other land, but not urban built-up land or water). It has the soil quality, growing season, and moisture supply needed to economically produce sustained high yields of crops when treated and managed, including water management, according to acceptable farming methods.”²² Farmland of statewide importance “is land, in addition to prime and unique farmlands, that is of statewide importance for the production of food, feed, fiber, forage, and oil seed crops. Criteria for defining and delineating this land are to be determined by the appropriate State agency or agencies. Generally, additional farmlands of statewide importance include those that are nearly prime farmland and that economically produce high yields of crops when treated and managed according to acceptable farming methods. Some may produce as high a yield as prime farmlands if conditions are favorable.”²³

Franklin County designates prime farmland and farmland of statewide importance as agricultural lands of long-term commercial significance.²⁴ This was also not disclosed in the Draft EIS. The Draft EIS also does not disclose that the prime farmland and farmland of statewide importance will be converted to urban uses by Alternatives 2 and 3. No mitigation is proposed for these undisclosed adverse impacts.²⁵

The adequacy of an EIS “is assessed under the ‘rule of reason’ ... which requires a reasonably thorough discussion of the significant aspects of the probable environmental consequences of the agency’s decision.”²⁶ The failure to even mention these significant adverse impacts on agricultural soils means that the Draft EIS is not adequate.

4.2 Surface Water: 4.2.2. Impacts, Alternative 1: No Action Alternative (page 23)

The Draft EIS claims on page 23, without any citation to evidence or analysis, that “[s]ince the additional and projected future growth won’t be occurring within the City limits, sprawled development will take place in the areas surrounding the City.” While there are some rural lands near Pasco, most of the land adjacent to Pasco and the existing UGA is designated as agricultural lands of

¹⁹ *Id.*

²⁰ *Id.*

²¹ *Id.*

²² 7 Code of Federal Regulations (CFR) § 657.5(a)(1).

²³ 7 CFR § 657.5(c).

²⁴ *Franklin County Growth Management Comprehensive Plan* p. 93 p. 96 (Agricultural Lands map) (Adopted Feb. 27, 2008 Resolution Number 2008-089).

²⁵ RCW 36.70A.130(5)(d).

²⁶ *City of Pasco Comprehensive Plan: Non-project Draft Environmental Impact Statement* pp. 19 – 20 (May 2020).

²⁶ *Weyerhaeuser v. Pierce Cty.*, 124 Wn.2d 26, 38, 873 P.2d 498, 504 (1994) internal quotation marks and citations omitted.

long-term commercial significance and are protected from sprawling development.²⁷ Most of the land in the western UGA expansion is also agricultural lands of long-term commercial significance.²⁸ The proposed western UGA expansion avoids the Rural lands north of Pasco between North Road 36 and Road 52.²⁹ It also does not include the Rural land north of the existing UGA along the Columbia River.³⁰ Given this evidence and the relatively low densities proposed for most of the UGA expansions, it is incorrect to assume, as the Draft EIS apparently does, that Alternative 1 will lead to more sprawl and greater impacts on surface and ground water quality. This sentence must be deleted to comply with SEPA.

4.2 Surface Water: 4.2.3. Mitigation Measures (page 24) and Summary of Impacts by Alternative 4.2.2. Surface Water (page 59)

Compact UGAs also help conserve water long-term. Large lots and low densities increase water demand, increase leakage from water systems, and increase costs to water system customers.³¹ So accommodating the same population in a right-sized UGA can reduce future water demands and costs.³² One of the mitigation measures for water quantity should be a smaller UGA expansion that conserves agricultural lands of long-term commercial significance.

Additional mitigation measures that should be included in the EIS include:

- Requiring street trees between streets and sidewalks. This will both reduce storm water runoff and making walking more inviting by helping to shade sidewalks and give a sense of protection from cars to pedestrians. Street trees can also help moderate temperatures.
- Assessing storm water fees based in part on impervious surfaces. The current storm water fees only consider impervious surfaces for uses other than single-family dwellings. This tends to encourage single-family homes to have large areas of impervious surfaces, increasing storm water runoff and water pollution.

Mitigation measures that reduce temperatures, such as planting street trees, will likely become increasingly valuable. The University of Washington Climate Impacts Group projects that in the Tri-cities the mean daily maximum heat index from May to September will increase from 82.6 degrees in 1970-2006 to 83.7 degrees in a low summer warming scenario, 84.9 degrees in a moderate warming scenario, and 87.1 degrees in a high warming scenario by 2025, just five summers from now.³³ By

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

²⁸ *Id.*

²⁹ *Id.*

³⁰ *Id.*

³¹ United States Environmental Protection Agency, *Growing Toward More Efficient Water Use: Linking Development, Infrastructure, and Drinking Water Policies* pp. 3 – 5 (EPA 230-R-06-001: Jan. 2006) accessed on June 5, 2020 at: <https://www.epa.gov/smartgrowth/growing-toward-more-efficient-water-use> and on the data CD enclosed with Futurewise's June 11, 2020, letter with the filename: "growing_water_use_efficiency.pdf."

³² *Id.* at p. 8.

³³ J. Elizabeth Jackson, MA; Michael G. Yost, PhD; Catherine Karr, MD, PhD, MS; Cole Fitzpatrick, MA; Brian K. Lamb, PhD; Serena H. Chung, PhD; Jack Chen, PhD; Jeremy Avise, PhD; Roger A. Rosenblatt, MD; Richard A.

2045, the mean daily maximum heat index, May through September, is projected to increase to 84.2 degrees in the low warming scenario, 86.4 degrees for the moderate warming scenario, and 90.0 degrees in the high warming scenario.³⁴

4.3. Plants and Animals: 4.3.1. Affected Environment (pages 25 – 27) and Summary of Impacts by Alternative 4.2.3. Plants and Animals (page 60)

Futurewise appreciates that the Draft EIS includes information on priority habitats and species identified the Washington State Department of Fish and Wildlife (WDFW). This is helpful to decision makers and the public.

Page 25 includes the following statement “WDFW designation of priority habitat types is advisory only and carries no legal protection; although, such designation may increase the significance of impacts as evaluated through the National Environmental Policy Act (NEPA) and the SEPA process.” While the Washington State Department of Fish and Wildlife does not have the authority to regulate most of the upland habitats identified by the priority habitats and species program, counties and cities are required to designate and conserve priority species and habitats through their GMA critical areas regulations.³⁵ WDFW does have regulatory authority over projects within the wetted perimeter of rivers, streams, and lakes.³⁶ We recommend that sentences to that effect be included in the Final EIS.

We appreciate the discussion of salmon and other aquatic species on page 27. In addition, the Upper Columbia & Snake Fall Upriver Brights have been identified as a priority Chinook salmon species for the recovery of the Southern Resident Orcas.³⁷ These salmon use the Columbia River and Snake River at Pasco and large parts of Franklin County.³⁸ To protect the Chinook salmon and help recover the Southern Resident Orcas, the Southern Resident Orca Task Force recommends

Fenske, PhD, Public Health Impacts of Climate Change in Washington State: Projected Mortality Risks Due to Heat Events and Air Pollution p. 355 & 359 in M. McGuire Elsner, J. Littell, and L. Whitely Binder (eds), *The Washington Climate Change Impacts Assessment* (Climate Impacts Group, Center for Science in the Earth System, Joint Institute for the Study of the Atmosphere and Oceans, University of Washington, Seattle, Washington: 2009) accessed on June 8, 2020 at: <http://cses.washington.edu/db/pdf/wacciach10health653.pdf> and enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: “wacciach10health653.pdf.”

³⁴ *Id.* p. 359.

³⁵ E. Larsen, J. M. Azerrad, N. Nordstrom, editors, *Management recommendations for Washington’s priority species, Volume IV: Birds* p. vi (Washington Department of Fish and Wildlife, Olympia, Washington, USA: 2004) last accessed on June 11, 2020 at: <https://wdfw.wa.gov/publications/00026/> and enclosed on the data CD enclosed with Futurewise’s June 11, 2020, letter with the filename: “wdfw00026.pdf;” *Ferry Cty. v. Concerned Friends of Ferry Cty.*, 155 Wn.2d 824, 832 – 33, 123 P.3d 102, 106 (2005).

³⁶ Chapter 77.55 RCW.

³⁷ National Oceanic and Atmospheric Administration and the State of Washington Department of Fish and Wildlife, Southern Resident Killer Whale Priority Chinook Stocks p. 6 (June 22, 2018) last accessed on June 5, 2020 at: <https://www.documentcloud.org/documents/4615304-SRKW-Priority-Chinook-Stocks.html> and enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: “SRKW-Priority-Chinook-Stocks.pdf.”

³⁸ WDFW Mapping SalmonScape Ocean chinook-ESU enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: “Chinook & Steelhead ESUs Franklin County.pdf.”

increasing affordable housing and reducing urban sprawl by growing “up instead of out.”³⁹ The proposed UGA expansions are inconsistent with the Southern Resident Orca Task Force recommendations and the EIS needs to disclose this impact. Further, a potential mitigating measure should be reducing or eliminating the UGA expansions.

The EIS should also analyze excluding Priority Habitats and Species including Washington State Department of Fish and Wildlife identified sandy shrub steppe habitats and potential breeding sites for burrowing owls from the UGA expansions. This will better conserve wildlife habitats as the GMA requires.

The Draft EIS on page 27 lists Townsend’s Ground Squirrel as one of the species listed as threatened or candidate species associated with shrub steppe habitat. While this is true generally, Townsend’s Ground Squirrel is not known to be found in Franklin County. We recommend instead that the Washington Ground Squirrel, which is found in Franklin County, be substituted.⁴⁰

4.3. Plants and Animals: 4.3.3. Mitigation Measures (pages 29 – 30)

Futurewise supports adopting and implementing low-impact development (LID) requirements and retaining native plants and native soils which the Draft EIS identifies as mitigating measures the City may implement. LID and retaining native plants and native soils can protect fish and wildlife habitat and water quality.⁴¹ We also support including the Broadmoor area as a wildlife area and corridor because this area includes significant areas of shrub-steppe habitat.

In addition to the proposed mitigation measures which Futurewise supports, we recommend that the city consider requiring landscaping with native plants to provide vegetation of habitat significance in streetscapes, buffers for stormwater swales, rain gardens, and other habitat features.

4.4. Land Use (pages 30 – 34) and Summary of Impacts by Alternative 4.2.4. Land Use (page 61)

Two letters commenting on the scope of the EIS recommended that the EIS examine impacts on agricultural land.⁴² Franklin County designates most of the land in the proposed UGA expansion as

³⁹ Southern Resident Orca Task Force, *Final Report and Recommendations* p. 107 (Nov. 2019) accessed on June 5, 2020 at: <https://www.governor.wa.gov/issues/issues/energy-environment/southern-resident-orca-recovery/task-force> and enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename:

“OrcaTaskForce_FinalReportandRecommendations_11.07.19.pdf”

⁴⁰ Washington State Department of Fish and Wildlife, Species and Habitats Identified for Franklin County in the Franklin County tab of the file “2020_distribution_by_county.xlsx” enclosed in a separate email and accessed on June 15, 2020 at: <https://wdfw.wa.gov/species-habitats/at-risk/phs/list>.

⁴¹ AHBL & HDR, *Eastern Washington Low Impact Development Guidance Manual* p. i, pp. 7 – 11 (State of Washington Department of Ecology Publication # 13-10-036: June 2013) accessed on June 15, 2020 at: <https://fortress.wa.gov/ecy/publications/SummaryPages/1310036.html>.

⁴² *City of Pasco Comprehensive Plan: Non-project Draft Environmental Impact Statement* pp. 86 – 87 (May 2020).

agricultural lands of long-term commercial significance.⁴³ This was not disclosed in the Draft EIS. The Draft EIS also does not disclose that the agricultural lands of long-term commercial significance will be converted to urban uses by Alternatives 2 and 3. No mitigation is proposed for these undisclosed adverse impacts.⁴⁴

The GMA prohibits including agricultural lands of long-term commercial significance within an UGA unless there is a purchase or transfer or development rights program adopted and implemented for those lands and they are protected as agricultural lands of long-term commercial significance.⁴⁵ This inconsistency with the GMA was not disclosed in the Draft EIS. The Draft EIS does not document that the agricultural lands of long-term commercial significance no longer meet the Franklin County or GMA criteria for such designations.

In addition to these undisclosed impacts, the Draft EIS does not disclose the impacts of allowing residential uses so close to the TriCities Airport on airport operations, the impacts of the limited airport expansion opportunities created by the UGA expansion, and the impacts of airport operations on residential uses in the vicinity of the airport.

The adequacy of an EIS “is assessed under the ‘rule of reason’ ... which requires a reasonably thorough discussion of the significant aspects of the probable environmental consequences of the agency’s decision.”⁴⁶ The failure to even mention these significant adverse impacts on agricultural lands of long-term commercial significance means that the Draft EIS is not adequate. It is the same with the impacts on the airport and the impacts of locating housing so close to the airport.

4.5. Environmental Health: 4.5.1: Affected Environment (page 35)

The U.S. Environmental Protection Agency’s Environmental Justice Screening and Mapping Tool documents that many areas of Pasco are in proximity to Risk Management Plan (RMP) facilities.⁴⁷ These are facilities that have potential chemical accident management plans and are within five kilometers (km) (or nearest one beyond 5 km) each divided by distance in km.⁴⁸ This map is calculated from the U.S. Environmental Protection Agency’s RMP database. The UGA expansion

⁴³ *Franklin County Growth Management Comprehensive Plan* p. 96 (Agricultural Lands map) (Adopted Feb. 27, 2008 Resolution Number 2008-089).

⁴⁴ RCW 36.70A.130(5)(d).

⁴⁵ *City of Pasco Comprehensive Plan: Non-project Draft Environmental Impact Statement* p. 34 (May 2020).

⁴⁶ 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.

⁴⁷ *Weyerhaeuser v. Pierce Cty.*, 124 Wn.2d 26, 38, 873 P.2d 498, 504 (1994) internal quotation marks and citations omitted.

⁴⁸ U.S. Environmental Protection Agency’s Environmental Justice Screening and Mapping Tool Traffic Proximity Screen shot accessed on June 8, 2020 at: <https://ejscreen.epa.gov/mapper/index.html?wherestr=Pasco%2C+Washington> and enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: “2020-06-08 EPA EJScreen Pasco RMP Proximity.pdf”

⁴⁹ U.S. Environmental Protection Agency’s EJSCREEN: Environmental Justice Screening and Mapping Tool Glossary of EJSCREEN Terms (part) accessed on June 8, 2020 at: <https://www.epa.gov/ejscreen/glossary-ejscreen-terms> and enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: 2020-06-08 EPA EJScreen Glossary Part.pdf.

areas are within the 90 to 95 percentiles for Washington State. Parts of Pasco and all of the UGA expansion areas also have a higher proximity to hazardous waste than other parts of Washington State.⁴⁹ We recommend that the EIS disclose these potential adverse impacts and identify potential mitigating measures. Given this and other issues with the UGA expansions planned for residential and commercial uses, one mitigating measure should be not including the area proposed for residential and commercial development within the UGA.

4.7. Population, Housing, and Employment: 4.7.2. Impacts (page 39) and Summary of Impacts by Alternative 4.2.6. Population, Housing and Employment (page 63)

Futurewise's scoping comment letter recommended that the EIS should analyze impacts on affordable housing.⁵⁰ Housing is an element of the environment.⁵¹ There is a significant need for more affordable housing in Pasco. A quarter of the homeowners with mortgages are paying 30 percent or more of their incomes for housing, the standard for cost overburdened housing.⁵² For renter-occupied housing units, 41.2 percent are paying 30 percent or more of their incomes for housing.⁵³

Overcrowding is related to housing affordability. Of the occupied housing units, 8.4 percent have 1.01 to 1.50 occupants per room.⁵⁴ Nearly four percent of the occupied housing units (3.9 percent) have 1.51 or more occupants per room.⁵⁵ There are early indications that overcrowding increases the risk of acquiring infectious diseases including Covid-19. Providing more opportunities for affordable housing by zoning for more affordable densities can reduce overcrowding.

Different alternatives may have different impacts on the affordable housing. However the Draft EIS does not analyze displacement impacts or whether each of the alternatives allow densities that would allow the construction of housing affordable to all income groups. This analysis is still needed.

The City of Pasco is considering the adoption of legislation to allow more "Missing Middle" housing in the City which Futurewise strongly supports. We recommend that the EIS include an estimate of the increased housing capacity this legislation will create and an analysis of the potential impacts of the legislation.

⁴⁹ U.S. Environmental Protection Agency's Environmental Justice Screening and Mapping Tool Hazardous Waste Proximity screen shot accessed on June 8, 2020 at: <https://ejscreen.epa.gov/mapper/index.html?wherestr=Pasco%2C+Washington> and enclosed on the data CD accompanying Futurewise's June 11, 2020, letter with the filename: "2020-06-08 EPA EJScreen Hazardous Waste Proximity.pdf"

⁵⁰ *City of Pasco Comprehensive Plan: Non-project Draft Environmental Impact Statement* p. 100 (May 2020).

⁵¹ WAC 197-11-444(2)(b)(ii).

⁵² United States Census Bureau, Selected Housing Characteristics American Community Survey Table: DP04 p. *10 (2018).

⁵³ *Id.* p. *11.

⁵⁴ *Id.* p. *7.

⁵⁵ *Id.*



4.8. Parks and Recreation: 4.8.3. Mitigation Measures (pages 42 – 43)

Figure 4-5, Proposed and Existing Parks, Schools and Open Space on page 43, includes the note “Urban Growth Area: Park/Open Space Area build as area develops.” It is unclear if this is a mitigation measure or something else. We recommend that the mitigation measures include a requirement that developers dedicate and construct neighborhood serving parks as development occurs. Where a park will serve more than one development, latecomer agreements could be used to share the costs with the other developments.

In addition, Figure 4-4 shows significant areas of the City that lack a neighborhood serving park or a school that can also function as a neighborhood park within a 15-minute walk of all homes. Figure 4-5 shows that this need will not be met in all areas of the City. We recommend as a mitigating measure that the parks and recreation plan should identify neighborhood park opportunities and funding to provide neighborhood parks within a 15-minute walk in all neighborhoods.

4.9. Transportation (pages 44 – 48) and Summary of Impacts by Alternative 4.2.8. Transportation (page 64)

We appreciate that the EIS, Volume 2 of the comprehensive plan, and the map folio have analyzed traffic impacts including traffic impacts on state highways. We appreciate the planned transportation projects. We also applaud and support the City’s complete streets policy.

However, the comprehensive plan and the UGA expansions have the potential to increase vehicle miles traveled and to increase traffic hazards. It does not appear that vehicle miles traveled and increased traffic hazards were analyzed and measures to reduce them were considered.

The UGA expansions and planned residential uses close to the airport will adversely impact the operations and expansion potential of the Tri-Cities Airport, an important regional transportation and economic development asset.⁵⁶ While the Draft EIS points to policy LU-2-E which discourages the siting of incompatible uses adjacent to the Pasco airport, the location of Low Density Residential and Medium Density Residential comprehensive plan designations adjacent to and at the northwest end of the runway is inconsistent with this policy.⁵⁷ The EIS does not analyze the adverse impacts of these designations on the airport, particularly the residential designations at the north end of the runway that preclude future expansion opportunities.⁵⁸ Nor does it analyze the impacts of the airport on the housing to be built in these areas.⁵⁹

⁵⁶ Proposed LU-1 Future Land Use Map. “The Tri-Cities Airport (PSC) is the largest airport in the Southeastern Washington and Northeastern Oregon region and the fourth largest air carrier airport in the state of Washington with connections to eight major hubs.” Port of Pasco, Tri-Cities Airport • PSC webpage accessed on June 5, 2020 at: <https://www.flytricity.com/>.

⁵⁷ Proposed LU-1 Future Land Use Map.

⁵⁸ *City of Pasco Comprehensive Plan: Non-project Draft Environmental Impact Statement* pp. 32 – 34, p. 45, p. 64 (May 2020).

⁵⁹ *City of Pasco Comprehensive Plan: Non-project Draft Environmental Impact Statement* pp. 32 – 34 (May 2020).



The draft EIS mentions recreational and commute bicycling and walking, but not walking and bicycling to access stores and services or the relevance of the placement of commercial zoning to allow for more convenient access by pedestrians and bicyclists.

There also does not appear to be plans to address the need for transit, walking, and bicycling within the city and within the urban growth area. Parts of the City of Pasco have a high proportion of households that lack access to private vehicles compared to Washington State as a whole.⁶⁰ Public transit is particularly important in those parts of the city but is also beneficial citywide. Walking and bicycling are important citywide. We were unable to find a long-range citywide plan for bicycle facilities, trails, sidewalks, and safe pedestrian crossings of major arterials. The levels of fatal and serious crashes involving pedestrians and bicyclists in parts of the City of Pasco underline the need for such a plan.⁶¹ The Draft EIS also did not analyze the need for these facilities. This analysis should be added to the EIS.

The U.S. Environmental Protection Agency's Environmental Justice Screening and Mapping Tool documents that many areas of Pasco suffer traffic proximity compared to other areas of Washington State.⁶² Many of these areas are proposed to be designated for residential uses.⁶³ We recommend that the EIS analyze whether noise walls, tree plantings, or other mitigation measures should be implemented to protect existing and proposed neighborhoods.

4.10. Public Services and Utilities (pages 48 – 54 and 4.2.9. Public Services and Utilities (page 65))

Residential growth in the City of Pasco has increased the exposure of residences on the Wildland Urban Interface to wildfires.⁶⁴ Expanding the city onto agricultural and rural lands will increase this exposure. Fire services are an element of the environment.⁶⁵ The impacts of the alternatives and UGA expansions on community fire safety must be analyzed in the EIS and mitigation measures identified such as: directing growth away from areas with a moderate to high wildfire threat levels.⁶⁶ Another potential mitigating measure would be to require new developments to meet Firewise

⁶⁰ Washington State Department of Health, Information by Location (IBL) - Washington Tracking Network (WTN) Social Vulnerability to Hazards No Access to a Private Vehicle (%) map.

⁶¹ Washington State Department of Health, Washington Tracking Network (WTN) Fatal and Serious Crashes involving a Pedestrian or Bicyclist- Rate per 100,000 accessed on June 8, 2020 at:

<https://fortress.wa.gov/doh/wtn/WTNPortal/home/#!q0=849> and enclosed on the data CD accompanying Futurewise's June 11, 2020, letter with the filename: "2020-06-08 WRN Fatal & Serious Crashes Ped & Bike.pdf."

⁶² U.S. Environmental Protection Agency's Environmental Justice Screening and Mapping Tool Traffic Proximity Screen shot accessed on June 8, 2020 at: <https://ejscreen.epa.gov/mapper/index.html?wherestr=Pasco%2C+Washington> and enclosed on the data CD accompanying Futurewise's June 11, 2020, letter with the filename: "2020-06-08 EPA EJScreen Pasco Traffic Proximity.pdf."

⁶³ Proposed LU-1 Future Land Use Map.

⁶⁴ *Franklin County, Washington Community Wildfire Protection Plan* pp. 48 – 51 (Approved by the Franklin County Commissioners 2014) last accessed on June 11, 2020 at:

https://www.dnr.wa.gov/publications/rp_burn_cwpp_franklin_co.pdf and enclosed on the data CD accompanying Futurewise's June 11, 2020, letter with the filename: "rp_burn_cwpp_franklin_co.pdf."

⁶⁵ WAC 197-11-444(2)(d)(i).

⁶⁶ See the *Franklin County, Washington Community Wildfire Protection Plan* pp. 45 – 46 (Approved by the Franklin County Commissioners 2014) for the threat level map.

Communities Program standards or the equivalent. Unfortunately, the Draft EIS did not include this analysis and mitigating measures despite the fact that Futurewise's scoping letter included this information.⁶⁷

The changing climate will also increase wildfires in the West including the City of Pasco. 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 2015.⁶⁸ Global warming's drying of wildfire fuels is projected to increasingly promote wildfire potential across the western US.⁶⁹ The area of this increase in drying fuels includes the City of Pasco.⁷⁰

The Draft EIS noted that "[i]rrigation exists surrounding the City, and this significantly reduces wildfire risk."⁷¹ But this ignores the *Franklin County, Washington Community Wildfire Protection Plan* which states three times that "[m]any irrigation systems and wells rely on above ground power lines for electricity. These power poles pass through areas of dense wildland fuels that could be destroyed or compromised in the event of a wildfire."⁷² One of the purposes of an EIS is to provide accurate information to the public and decisions makers not to shoot from the hip. This statement in the Draft EIS also ignores the fact that the comprehensive plan update proposes to pave over thousands of acres of irrigated farmland and replace them with flammable homes.

The Draft EIS states that "the City conducted an Expanded UGA Infrastructure Evaluation, which evaluated the impact of the anticipated growth, UGA expansion, and land use changes. As a result, in order to accommodate future growth, the City will need to make additional improvements to the West Pasco WTP, Zone 3 Reservoir, and acquire additional water rights to meet the 2038 demands."⁷³ But the Draft EIS does not indicate whether it is possible to acquire the water rights or whether the water rights will be acquired at the expense irrigated farms. This requires further analysis and disclosure.

4.11. Heritage Conservation (pages 54 – 57) and Summary of Impacts by Alternative 4.2.10. Heritage Conservation (page 66)

We appreciate this section of the Draft EIS and particularly appreciate the disclosure that construction allowed under the alternatives could potentially impact cultural resources including recorded and unrecorded archaeological sites.

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

⁶⁷ City of Pasco Comprehensive Plan: Non-project Draft Environmental Impact Statement pp. 100 – 101 (May 2020).

⁶⁸ 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) last accessed on June 5, 2020 at: <http://www.pnas.org/content/113/42/11770>.

⁶⁹ *Id.*

⁷⁰ *Id.* at p. 11771.

⁷¹ City of Pasco Comprehensive Plan: Non-project Draft Environmental Impact Statement p. 52 (May 2020).

⁷² *Franklin County, Washington Community Wildfire Protection Plan* p. 68, p. 70, p. 72 (Approved by the Franklin County Commissioners 2014).

⁷³ City of Pasco Comprehensive Plan: Non-project Draft Environmental Impact Statement p. 100 (May 2020).

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.⁷⁴ The predictive model shows that the City of Pasco and the UGA expansion areas have a “high risk” and “very high risk” of cultural resources.⁷⁵ The Draft EIS should include as a mitigating measure adopting regulations that require consultation with Native American Tribes and Nations and site investigations by archaeological professionals before allowing ground disturbing activities in the city and UGA.

The EIS should analyze the impacts on air quality and greenhouse gas emissions

Futurewise’s scoping comment letter requested that the EIS analyze impacts on air quality and greenhouse gas pollution.⁷⁶ Air quality is an element of the environment.⁷⁷ 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 Clean Air Agency, 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.⁷⁸ 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 UGA will increase vehicle miles travelled and emissions. These are all probable adverse impacts on elements of the environment and should have been but were not analyzed in the EIS.

Climate is also an element of the environment.⁷⁹ 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 reduce greenhouse gas pollution and vehicle miles traveled. Almost half of all greenhouse gas emissions in our state result from the transportation sector.⁸⁰ Land use and transportation strategies that promote compact and mixed-use development and infill reduce the need to drive and greenhouse gas emissions.⁸¹ Expanding the UGA will increase

⁷⁴ Washington State Department of Archaeology and Historic Preservation, Find a Historic Place webpage accessed on June 5, 2020 at: <https://dahp.wa.gov/historic-preservation/find-a-historic-place>.

⁷⁵ *Id.*

⁷⁶ *City of Pasco Comprehensive Plan: Non-project Draft Environmental Impact Statement* pp. 102 – 103 (May 2020).

⁷⁷ WAC 197-11-444(1)(b)(i).

⁷⁸ 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 June 8, 2020.

⁷⁹ WAC 197-11-444(1)(b)(iii).

⁸⁰ Evan Bush, *Washington’s greenhouse-gas emissions continue to trend higher in latest inventory* *Seattle Times* p. *5 (Nov. 19, 2019) accessed on June 8, 2020 at: <https://www.seattletimes.com/seattle-news/environment/washingtons-greenhouse-gas-emissions-continue-to-trend-higher-in-latest-inventory/> and enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: “WA GHG emissions trend higher Seattle Times Nov 2019.docx.”

⁸¹ Caroline Rodier, *A Review of the International Modeling Literature: Transit, Land Use, and Auto Pricing Strategies to Reduce Vehicle Miles Traveled and Greenhouse Gas Emissions* p. 21 (2009-10-01) accessed on June 8, 2020 at: <https://escholarship.org/content/qt2jh2m3ps/qt2jh2m3ps.pdf> and enclosed on the data CD accompanying

vehicle miles travelled and emissions. These are all probable adverse impacts on climate, an element of the environment, and should have been analyzed in the Draft EIS, but were not.

In addition, Washington is already not on track to meet the 2020 greenhouse gas reduction requirement of 90.0 million metric tons (MMT).⁸² The 2017 emissions were 97.5 MMT.⁸³ Trips generated by residents of the UGA expansion will increase global warming and its adverse impacts on Franklin County including increased wildfires, increased demands for water, and reduced water availability in the summer and fall due to a reduction in water stored as snow in the spring and summer.⁸⁴ Recent scientific reports document that “the required cuts in emissions are now 2.7 per cent per year from 2020 for the 2°C [temperature increase] goal and 7.6 per cent per year on average for the 1.5°C goal.”⁸⁵ “Further delaying the reductions needed to meet the goals would imply future emission reductions and removal of CO₂ from the atmosphere at such a magnitude that it would result in a serious deviation from current available pathways. This, together with necessary adaptation actions, risks seriously damaging the global economy and undermining food security and biodiversity.”⁸⁶ We cannot afford to take actions that increase global warming pollution, we must decrease it. Actions that increase global warming pollution also violate RCW 36.70A.020(10) which directs the City of Pasco to “[p]rotect the environment and enhance the state’s high quality of life, including air and water quality, and the availability of water.”

SEPA EISs are required to analyze greenhouse gas pollution. As the Shorelines Hearings Board concluded, “because it failed to fully analyze the impacts of greenhouse gas emissions from the Project and to consider whether additional mitigation is required, the Final EIS is remanded to Cowlitz County and the Port for further SEPA analysis consistent with this opinion.”⁸⁷

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 or Tim Trohimovich at telephone (206) 343-0681 Ext. 101 and email: tim@futurewise.org.

Futurewise’s June 11, 2020, letter with the filename: “A Review of the International Modeling Literature Transit, Land Use, and Auto Pricing.pdf.”

⁸² State of Washington Department of Ecology, *Washington State Greenhouse Gas Emissions Inventory: 1990-2015: Report to the Legislature* p. vii & p. 1 (Publication 18-02-043: Dec. 2018) accessed on June 8, 2020 at:

<https://fortress.wa.gov/ecy/publications/documents/1802043.pdf> and enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: “1802043.pdf;” Evan Bush, *Washington’s greenhouse-gas emissions continue to trend higher in latest inventory* *Seattle Times* (Nov. 19, 2019).

⁸³ State of Washington Department of Ecology, *2017 greenhouse gas data* webpage accessed on June 8, 2020 at:

<https://ecology.wa.gov/Air-Climate/Climate-change/Greenhouse-gases/2017-greenhouse-gas-data> and enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: “2019-11-25 2017 Greenhouse Gas Data.pdf.”

⁸⁴ State of Washington Department of Ecology, *Climate change and the environment* webpage accessed on June 8, 2020 at:

<https://ecology.wa.gov/Air-Climate/Climate-change/Climate-change-the-environment> and enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: “2019-11-25 Climate Change and the Environment.pdf.”

⁸⁵ United Nations Environment Programme, *Emissions Gap Report 2019* p. xx (UNEP, Nairobi: 2019) accessed on June 8, 2020 at: <http://www.unenvironment.org/emissionsgap> and enclosed on the data CD accompanying Futurewise’s June 11, 2020, letter with the filename: “EGR2019 for emailing.pdf.”

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⁸⁷ *Columbia Riverkeeper, Sierra Club, and Center For Biological Diversity v. Cowlitz County, Port of Kalama, Northwest Innovation Works-Kalama, LLC, and State of Washington, Department of Ecology*, Shorelines Hearings Board (SHB) No. 17-010c, Order on Motions for Partial Summary Judgment (Sept. 15, 2017), at 18, 2017 WL 10573749, at *9.

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June 15, 2020
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Very Truly Yours,



Alison Cable
Tri-Cities Program Manager



Tim Trohimovich, AICP
Director of Planning & Law

Enclosure

Soils Pasco Proposed Urban Growth Area (UGA) Expansion June 2020				
Soils NW Part of Pasco UGA Expansion				
Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI	Farmland Classification
10	Chedchap fine sandy loam, 0 to 2 percent slopes	297.1	10.4%	Prime farmland if irrigated
11	Chedchap fine sandy loam, 2 to 5 percent slopes	45.5	1.6%	Prime farmland if irrigated
89	Quincy loamy fine sand, 0 to 15 percent slopes	1,509.6	52.8%	Farmland of statewide importance
90	Quincy loamy fine sand, 15 to 30 percent slopes	126.1	4.4%	
96	Quincy-Dune land complex, 5 to 40 percent slopes	23.7	0.8%	
102	Quincy-Timmerman complex, 0 to 15 percent slopes	318.0	11.1%	Farmland of statewide importance
128	Royal fine sandy loam, 0 to 2 percent slopes	49.6	1.7%	Prime farmland if irrigated
129	Royal fine sandy loam, 2 to 5 percent slopes	145.4	5.1%	Prime farmland if irrigated
184	Timmerman fine sandy loam, 2 to 5 percent slopes	40.0	1.4%	Prime farmland if irrigated
217	Winchester loamy coarse sand, 2 to 5 percent slopes	305.2	10.7%	
Totals for Area of Interest		2,860.3	100.0%	
Prime Farmland Total		577.6	20.2%	
Farmland of Statewide Importance Total		1,827.6	63.9%	
Soils NE Part of Pasco UGA Expansion				
Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI	Farmland Classification
4	Burbank loamy fine sand, 0 to 5 percent slopes	24.6	4.0%	
5	Burbank loamy fine sand, 5 to 10 percent slopes	2.9	0.5%	
29	Hezel loamy fine sand, 0 to 15 percent slopes	6.0	1.0%	Farmland of statewide importance
44	Kennewick silt loam, 2 to 5 percent slopes	3.4	0.6%	Prime farmland if irrigated
76	Pits	91.5	14.9%	

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI	Farmland Classification
89	Quincy loamy fine sand, 0 to 15 percent slopes	356.4	58.2%	Farmland of statewide importance
92	Quincy loamy fine sand, loamy substratum, 0 to 10 percent slopes	13.5	2.2%	Farmland of statewide importance
126	Royal loamy fine sand, 0 to 10 percent slopes	0.4	0.1%	Farmland of statewide importance
128	Royal fine sandy loam, 0 to 2 percent slopes	60.6	9.9%	Prime farmland if irrigated
129	Royal fine sandy loam, 2 to 5 percent slopes	36.3	5.9%	Prime farmland if irrigated
144	Sagemoor very fine sandy loam, 0 to 2 percent slopes	0.3	0.0%	Prime farmland if irrigated
183	Timmerman fine sandy loam, 0 to 2 percent slopes	6.5	1.1%	Prime farmland if irrigated
184	Timmerman fine sandy loam, 2 to 5 percent slopes	10.0	1.6%	Prime farmland if irrigated
Totals for Area of Interest		612.2	100.0%	
Prime Farmland Total		117.1	19.1%	
Farmland of Statewide Importance Total		376.3	61.5%	
Total for Both UGA Expansions Areas				
Prime Farmland		694.7	20.0%	
Farmland of Statewide Importance		2,203.9	63.5%	
Total		2,898.6	83.5%	
AOI means Area of Interest, the UGA expansion areas				
Source: United States Department of Agriculture Natural Resources Conservation Service Web Soil Survey accessed on June 4, 2020 at: https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm ; Soil Map—Franklin County, Washington (Pasco UGA Expansion NW Part) p. 1 (6/4/2020) enclosed in a separate email with the filename: "Pasco NW UGA Expansion Soil_Map.pdf;" Soil Map—Franklin County, Washington (Pasco UGA Expansion NE Part) p. 1 (6/4/2020) enclosed in a separate email with the filename: "Pasco NE UGA Expansion Soil_Map.pdf."				