



# FRANKLIN COUNTY

## PLANNING AND BUILDING DEPARTMENT

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COMMUNITY & ECONOMIC DEVELOPMENT

June 15, 2020

Rick White  
Community & Economic Development Director  
City of Pasco  
525 N. 3rd Avenue  
Pasco, WA 99301

**RE: City of Pasco Comprehensive Plan Draft EIS (Non-Project Action)**

Dear Mr. White:

Thank you for the opportunity to provide these comments from Franklin County Planning staff on the Draft Environmental Impact Statement (DEIS) issued in May 2020 by the City of Pasco for the City's Comprehensive Plan update. We reviewed the DEIS, and consulted the Draft Comprehensive Plan Documents included on the City's webpage (Vol. 1 and Vol. 2 of the Comprehensive Plan and Appendixes A, B, C and D) for context, as well as the City of Pasco Comprehensive Sewer Plan (May 2014).

As you are aware, Franklin County staff is anticipating the submission of a revised Urban Growth Area (UGA) expansion application in the near term from the City of Pasco's staff. Only the County Board of Commissioners can approve a UGA expansion (RCW 36.70A.110(1)), and the Board will consider the matter after the County's Planning Commission reviews the proposal. As such, your final EIS will be a very important document, which the County hopes to be able to rely upon for a review of the environmental impacts of such as change, under SEPA.

We wish to commend you, your staff, and your advisors on preparing a detailed comprehensive plan and supporting documentation for the future development of Pasco, which is the largest population center in the County. We know this was a substantial effort, which will prove to be critical for Pasco's future.

Your consideration of different alternatives and methods for addressing growth will benefit the county residents in many ways, including preservation of farmlands and in ensuring fiscal responsibility related to the expenditure for public funds.

Our specific comments on the draft EIS are as follows:

**Page a:** Where "Required permits and approvals" are listed, the text should be updated to note that any approval of the Urban Growth Area expansion would be granted by the Franklin County Board of County Commissioners. Also discuss any review of your transportation element that would be conducted by the Benton-Franklin Council of Governments, such as certification through their board (contact: Erin Braich, Senior Transportation Planner - Benton-Franklin Council of Governments, (509) 943-9185).

**Page b:** It appears that *The City of Pasco Urban Growth Area Expansion Capital Facilities Analysis* (May 21, 2020) and its appendix *Expanded UGA Infrastructure Evaluation* by Murray Smith and Associates (November 18, 2019) should be added as "Related Plans and Documents."

### **Chapter 1 Overview**

**Section 1.1 Introduction:** The periodic update was due to be completed by June 30, 2018 (not 2019).

**Table 1:** It appears that the population in Franklin County, 10 Year increase should list 28,251 (not 30,493); it looks as though there was a computational error. (*Also see Table LU-4 in the draft Comprehensive Plan update which shows the same figures*). Next, where it says "Residential units needed in Pasco in 10 years, ...20 years" the label should instead say "*Additional* Residential units needed in Pasco in....."; it would also be a good idea to put the topic in a different column, as the column is labeled "Population" in the heading.

**Table 2:** Add the sum of residential units (9,580) for existing capacity. Also, the related text does not describe where Broadmoor is or provide a map; which would help readers unfamiliar with the area. In addition, Table 2 does not seem to correspond with later discussion of the Broadmoor area, that describes different density scenarios between Alternative 2 and Alternative 3. Which alternative does the table reference, and should the table be expanded to list capacity at Broadmoor under both Alternatives?

### **Chapter 2 Alternatives**

**Chapter 2 Alternatives:** Alternatives 2 and 3 both involve adding industrial lands into the City's UGA. It would be helpful to emphasize that the land being brought inside the UGA is already classified as industrial by Franklin County (as a Limited Area of More Intensive Rural Development or "LAMIRD"). There is no net increase in the amount of land designated for industrial purposes, rather it is a jurisdictional change. Switching the land from industrial in the county to industrial in the city makes sense so that urban-level services can be provided.

**Table 3:** The information in the table does not correspond with the referenced figure (for example, there are no airport reserve lands or DNR reserve lands on the map).

**Tables 4 and 5:** These tables should be better labeled to detail that they are referencing *increased* UGA totals. For Table 4, why not include a full table that shows the changes in land uses from Alternative 1 to Alternative 2? Comparing Alternative 1 to Alternative 2 does not only involve additional land in the UGA, but it also involves the re-designation of some land within existing city limits and UGA. Additionally, it is unclear how land uses in the Broadmoor area differ between Alternative 2 and Alternative 3. (Table 5 and Table 6 both show sufficient detail for Alternative 3).

### **Chapter 3: Major Issues and Summary of Environmental Impacts**

**Section 3.1.1 Increased Density and Development:** The first sentence says "Densities will be increased under the preferred alternatives" yet there is only one stated "preferred alternative" – Alternative 3. This should be corrected. Next, the text includes a reference to the Riverview area, and is the first mention of Riverview. We suggest defining the area, showing it on a map, or including a footnote with a description. Additionally, a reference is made to City of Pasco Ordinance 4221. Since the time period under which the Ordinance take effect has lapsed it is

not clear how this is important. Did / will the city extend the time period? If the Ordinance no longer applies it may be best to exclude the reference and related discussion from the EIS.

**Section 3.1.2 Traffic:** Are there any figures or forecasts to support the information provided in the section? When "increases" in traffic are discussed, what is the magnitude? Consider referencing supporting documents or including data from your studies.

**Table 7:**

- In the row for "Urban Growth", column for Alternative 1, we suggest changing the statement to say that the alternative would accommodate the least amount of projected growth.
- In the row for "Transportation," column for Alternative 3, we suggest noting the alternative could result in shorter trips due to more compact development patterns (this could also include mode split shifts- i.e. more kids walking to school).
- For the row for "Economic Development," column for Alternative 3, consider noting that the alternative results in conversion of less land than Alternative 2 which is currently in agricultural production, which relates to production of commodities, food processing jobs, etc.
- For the row for "Open Space...," column for Alternative 3, consider adding that with a smaller growth area "footprint" there will be less affected fish and wildlife habitat.

**Figures 4-1, 4-2, and 4-3:** Specify that the referenced "proposed UGA" is Alternative 3. None of the maps show the mapped features which are present farther north, and which would be included in the Alternative 2 scenarios. These maps should all be updated in order for Alternative 2 to be fully presented/ examined in the document.

**Table 8:** There is a reference to one mine site and a reference to "both" which is confusing. Verify the correct number of mine sites. It would be helpful to show the mine(s) on a map or at least, describe the general location. In Vol. II of the draft Comprehensive Plan update, two mineral resource sites are referenced.

## **Chapter 4: Affected Environment, Impacts and Mitigation Measures**

### **4.1 Earth**

**Figure 4-1:** Consider showing and labeling the location of the liquefaction susceptibility zone as referenced in Table 8. (Perhaps consider cross-referencing to the draft Comprehensive Plan map folio.)

**Section 4.1.2 Impacts:** The Alternative 3 discussion says that Broadmoor will be developed with more density in Alternative 3 than Alternative 2, but there is little detail or information on that. It would be helpful if more information was provided.

### **4.2 Surface Water**

**Section 4.2 Surface Water:** Consider re-naming the section "Surface and Ground Water."

**Section 4.2.1 Affected Environment:** We suggest changing the description that currently states the Columbia River is to the south of the City, to instead describe that the river lies to the west and south of the City.

**Section 4.2.1 Affected Environment:** The final paragraph discusses City of Pasco Water Rights. It is unclear in the document if the City has sufficient water rights to accommodate the considered alternatives. Please indicate if this is an issue or not (or reference supporting documents). Mitigation measures should be listed, if relevant.

**Section 4.2.2 Impacts:** We recommend adding an observation that expansion of the city's UGA and subsequent annexation and extension of sewer can limit the trend of homes that are built with septic systems, which can benefit groundwater and lessen impacts on it. We also noticed that "Alberti et. al." is referenced, but the reference does not appear in the bibliography. There may be other instances where references are not included in the bibliography.

**Section 4.2.3 Mitigation Measures:** We recommend adding a mitigation measure about low-impact development (LID), which appears later in the document (section 4.3.3), to this section on stormwater. It would be appropriate to discuss LID in the stormwater mitigation section.

#### **4.3 Plants and Animals**

**Section 4.3 Plants and Animals:** We noticed there is no reference to bird migration routes.

**Section 4.3.2 Impacts:** First, this section could be improved by mentioning that development can cause displacement of habitat. Next, under the "Alternative 1: No Action Alternative" subsection, there is a statement that reads "the least amount of development would occur as it [the alternative] has the least projected population growth." This is not a true statement; the population growth projection *does not change* between the scenarios, only the amount of development to accommodate such growth does.

#### **4.4 Land Use**

**Section 4.4.1 Affected Environment:** We recommend broadening this section to answer the SEPA checklist question "*Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use? Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting?*" Please discuss compatibility of the new development under the proposed alternatives with existing farming practices in the area.

**Table 9:** The table shows existing land use designations, and not necessarily existing uses as developed (if that were truly the case, you would have a vacant land category, among others). We suggest re-naming the table for better understanding. Also, airport reserve lands and DNR Reserve lands are going to be newly introduced in the comprehensive plan update, and therefore appear out of place here for a discussion of "existing land uses." Likewise, Table 10 should also be re-titled.

**Section 4.4.1 Affected Environment:** The text included after Table 9 should be corrected to discuss the U. S. Army Corps of Engineers (not Corp). Also, it appears that there should be more discussion / mention of DNR land holdings in this section.

**Section 4.4.1 Affected Environment:** At the top of page 32 there is a list of Comprehensive Plan designations. Please specify that this list is from the draft *updated* comprehensive plan, and not from the current plan.

**Section 4.4.2 Impacts:** Discuss existing airport and land use compatibility issues, and how the Comprehensive Plan addresses them.

**Section 4.4.3 Mitigation Measures:** The last two paragraphs at the end of the section are unclear. In addition, include a mention of the new aviation easement(s) that will be in place near the airport. The section should also discuss existing zoning code provisions (for both Franklin County and the City of Pasco) for the Airport Overlay District – which provides for safety compatibility zones, use restrictions, and height limitations - as mitigation measures to address development proximate to the Tri-Cities Airport.

#### **4.5 Environmental Health**

**Section 4.5.1 Affected Environment:** Change the last paragraph to “During construction and operation of some industrial developments....”

**Section 4.5.2 Impacts:** Consider adding some language referencing that open burning is not allowed within the UGA - expanding the UGA will limit the ability for existing and future residents in the subject area from being able to burn, which may lead to air quality enhancements.

**Section 4.5.3 Mitigation Measures:** ED-1-C Policy does not appear to really fit in with the section’s subject.

#### **4.6 Shoreline Use**

**Section 4.6.2 Impacts:** Shoreline uses are already regulated by the County, and shoreline functions are protected through mitigation to ensure a no net loss standard. If the UGA is expanded north (and specify the linear miles) and the land is annexed, then regulation of shoreline uses transfers to the City.

**Section 4.6.2 Impacts:** It would be helpful if the document would quantify the different linear length of shoreline area included in the different alternatives.

#### **4.7 Population, Housing, and Employment**

**Section 4.7.1 Affected Environment:** The figures included in the first paragraph are not consistent with the data shown in Table 1 and Table 2. Table 1 shows that 7,522 additional residential units will be needed in 10 years and 15,217 additional units will be needed in 20 years.

#### **4.8 Parks and Recreation**

**Section 4.8 Parks and Recreation:** No comments

#### **4.9 Transportation**

**4.9.3 Mitigation Measures:** The draft Comprehensive Plan update document says, "The City of Pasco adopted Ordinance No. 3821 establishing concurrency procedures for transportation facilities in conjunction with new development." Consider adding this measure as a mitigation.

#### **4.10 Public Services and Utilities**

**4.10.2 Impacts:** Will infrastructure projects and improvements result in any business displacement?

**4.10.3 Mitigation Measures:** The total cost for capital improvements for 2020-2025 is \$249M (of which \$57M would be spent on Sewer System Improvements and \$48M would be spent on transportation improvements), as identified in Table CF-1 in the draft Comprehensive Plan Vol. 2. It would be prudent to call out the planned investment in Capital Facilities in this section, or elsewhere in the document.

#### **4.11 Heritage Conservation**

**Section 4.11 Heritage Conservation:** No comments.

In terms of general items, we offer the following comments:

- 1. Consider Discussing Impact Fees:** While impact fees are not discussed in the EIS document, they are clearly an important part of the scheme for funding improvements related to future growth. For example, City representatives have been very forthright in their support for impact fees to fund schools. Some mention or reference to these mitigation measures should be incorporated into the EIS, unless the City Council intends to discontinue the fees.
- 2. Document Choices Made when Determining UGA Alternatives:** When the City's updated UGA application is provided to the County for processing, it would be very helpful if an explanation or documentation is provided with your submittal, identifying how certain properties were selected (or not selected) to be included in Alternative 3.

We are aware that some landowners and other stakeholders have voiced concerns about this issue, and it would be helpful to have a record to refer to regarding these choices, for reference when the UGA application is considered by the County for legislative processing. For example, it would be important for the city staff to provide the rationale used to propose extending its UGA into areas which are currently designated as "Agricultural Lands" in some of the most northerly locations, as opposed to taking in the areas designated as rural (the LAMIRDs).

In particular, we offer the following observations related to planned infrastructure investments:

- a. The Kohler properties (which are included in the County's Columbia River West Area LAMIRD) are excluded from the UGA in Alternative 3, but the City of Pasco 2014 Sewer Comprehensive Plan shows that the city public works department plans to extend sewer infrastructure to these locations by 2026. (We understand that the city's Public Works Department is currently updating the 2014 Comprehensive Sewer Plan with an addendum that incorporates proposed expansion of the Urban**

Growth Area, however it is unclear if that document should be relied upon for this analysis.) Likewise, the property is proximate to a proposed future lift station and proposed sewer pipes are drawn extending to the property line in Exhibit CF-2 of the draft Comprehensive Plan update map folio.

- b. Only part of the Thanksgiving Partnership (TLP) property (which is included in the County's East Foster Wells Road Area LAMIRD) is included in the UGA under Alternative 3, but sewer is projected to run up Capitol Ave. to E. Foster Wells Rd. by 2031.
3. **Document Choices Made when Determining Future Land Use Designations:** When the updated UGA application is provided to the County for processing, it would be very helpful if an explanation or documentation is provided with your submittal. We will be comparing the areas selected for more intensive uses with the existing development patterns of the LAMIRDS.
4. **Discuss Annexation Plans and Policies:** We recommend adding a discussion to address how City staff foresees annexation would take place. It appears that the documents do not show any proposed "phasing" approach to the UGA expansion; rather, it appears that the UGA expansion would occur at one time. This is unfortunate, particularly since materials presented during the August 15, 2019 Planning Commission workshop included "10 year and 20 year boundaries." Has the City staff changed their approach in this regard?

We recommend adding more discussion describing phasing, and how annexation could be used as a tool to prevent land entitlements from being possibly granted before services are in place.

Furthermore, if there are other mechanisms that City staff has in mind to phase expansion into the UGA, those should be detailed as well. The Department of Commerce's Urban Growth Area Guidebook (Page 19) could be consulted for suggestions. Absent any mechanisms or stated preference or intentions, the County staff will likely include proposed "future UGA reserve areas" or UGA phasing in their recommendation to the County Planning Commission and County Commissioners for consideration.

5. **Expand and Clarify the Discussion of the Broadmoor Area:** The discussion of the Broadmoor area and the future development is rather limited in some topics, and could be broadened, particularly since the bulk of development to occur within the current city limits will be at Broadmoor.

Since mining is occurring on the site, we paid particular attention to the discussion about mining in Vol. II of the draft Comprehensive Plan update, which says on page 138 (emphasis added):

*Presently, American Rock Products is mining the lands and producing various types of crushed rock. American Rock Products also produces ready mix concrete utilizing gravel the company mines. The crushed rock and sand that are derived from the American Rock pit are used throughout the region in the construction industry.*

*Because of the importance of gravel for construction activities and the lack of other known mineable sites, there is a need to protect the lands located in Section 12 [T. 9N R. 28E] and Section 7 [T. 9N R. 29E] for mineral extraction. With the Pasco UGA population project to increase by about 50,148 over the next 20 years, there will be an ever-increasing need for mineral resources for new infrastructure, and residential, commercial, and industrial development.*

*American Rock estimates that there are enough resource materials in these lands that mining could continue for another 20 to 25 years...*

The above text appears to conflict with the following statement, on the same page:

*...While the lands described above have been designated for mineral extraction, such use designation is considered an overlay use only. Upon completion of the mineral extraction, the intended and ultimate use of the land is as shown on the land use map...*

Furthermore, the rock mine location is shown to carry a proposed medium density residential designation. Please provide further discussion on what portions of the Broadmoor area are encumbered by mining verses what areas are going to be developed in the next 20 years. Please elaborate further on what mitigation measures will be needed, or what policies the City Council may put into place to assure compatibility between on-going rock extraction operations and proposed new development within a close proximity.

Additionally, when the City staff provides a formal UGA re-application, it will also be important for the package to include information regarding the phasing or development timeline intended for the Broadmoor area, particularly for annexation. One of the mixed-use, land use classifications in alternative 3 (Mixed Use Neighborhood) is located mostly outside of city limits in the proposed UGA. Table LU-1 in the draft City of Pasco Comprehensive Plan – Vol. II shows that a zoning district known as “MU-N” will be used in the development regulations to implement the Mixed Use Neighborhood designation. The City staff should coordinate with the County staff so it can be determined if a similar zoning district will be needed in the County’s zoning code. (See County-Wide Planning Policy Section II, no. 9 and Section VII, no. 28 and 29.)

- 6. Identify and Discuss Zoning Code Modifications:** It is clear that Pasco’s zoning regulations will need to be revised, and several new chapters added for new zoning designations. What will be the process for this work? Is that work already underway? In Sec. 4.4.3 there is a statement that “The City of Pasco Zoning Regulations in PMC Title 25 regulate development in various zoning districts, and a zoning change could be made to further restrict the type and density of development in the planning area.” It appears that more attention and discussion should be granted on this topic, within the context of the EIS, to properly identify mitigation measures, and measures to address impacts.

To summarize, we have found areas where the DEIS should be further revised or amended prior to the issuance of a final EIS, to clarify and document plans, their impacts, and mitigation strategies. We have also identified some areas of concern related to an Urban Growth Area expansion request and have provided some early feedback in anticipation of the application, based on the EIS. As always, we welcome a meeting to coordinate and collaborate on these important issues.



Mr. Rick White  
June 15, 2020  
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Thank you once again for the opportunity to provide comments on the Draft EIS. If you have any questions on our comments, please contact our office.

Sincerely,



6/15/2020

Derrick Braaten  
Planning and Building Director

CC: Jacob Gonzales, City of Pasco  
Ben Floyd, White Bluffs Consulting  
Nicole Stickney, AHBL  
Matt Mahoney, Franklin County  
Keith Johnson, Franklin County