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June 17, 2020

Ms. Tanya Bowers, Chair
City of Pasco Planning Commission
525 N. Third Ave.
Pasco, Washington 99301

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EXHIBIT J

JUN 17 2020

COMMUNITY & ECONOMIC DEVELOPMENT

Dear Chair Bowers and Planning Commissioners:

Subject: Comments for the public hearing on the Comprehensive Plan Amendment on the Urban Growth Area (MF# CPA 2020-001).

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

Thank you for the opportunity to comment on the Comprehensive Plan Amendment on the Urban Growth Area (MF# CPA 2020-001). 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.

We urge the Planning Commission to recommend denial of the current proposed urban growth area (UGA) expansion for three reasons: it will pave over working farms, it will adversely impact the future expansion potential for the Tri-Cities Airport, and no Final Environmental Impact Statement (Final EIS) has been issued for the comprehensive plan update. We provide more detail on these three concerns below.

We also recommend that the comprehensive plan update incorporate the following principles:

- Do not plan for increased residential development around the Tri-Cities Airport. Building residential uses north and west of the runways will make future expansion of the airport expensive if not impossible, the new residential uses will be adversely impacted by the airport noise and flights, and the new residential uses will make airport operations more difficult long-term because of complaints.
- Include compact urban growth areas that are well designed and well furnished with amenities, encompassed by natural resource lands and a rural landscape. In addition to creating a city with a high quality of life, this will save taxpayers and ratepayers money.¹
- Design walkable neighborhoods with the densities and a mix of zoning to support local businesses and safe streets, with bike lanes and frequent transit to promote environmental and

¹ John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 Environment and Planning B: Planning and Design 503, 518 (2003) enclosed in a separate email.



community health and reduce traffic congestion. This will reduce transportation costs, make neighborhoods more convenient, and increase opportunities for healthy activities.

- Provide for a long-term capital facilities plan that will ensure that taxpayers in existing City of Pasco neighborhoods do not end up subsidizing the public facilities and services in new neighborhoods. This will also save money for taxpayers and ratepayers.
- Reinvest in existing neighborhoods and businesses such as historic downtown Pasco. This improve the City of Pasco's economy and quality of life.

The proposed UGA expansion paves over working farms designated by Franklin County as agricultural lands of long-term commercial significance

Franklin County has designated most of the land in the proposed UGA expansions as agricultural lands of long-term commercial significance.² In a new report, the American Farmland Trust has identified much of the UGA expansions as “nationally significant agricultural land.”³ Nationally significant agricultural land is a designation for farmland that is best suited for long-term cultivation and food production.⁴ It was developed by the *Farms Under Threat* study in consultation with experts.⁵ The U.S. Department of Agriculture Natural Resources Conservation Service identifies 2,898.6 acres, 83.5 percent of the proposed UGA expansions, as prime farmland and farmland of statewide importance.⁶ These are U.S. Department of Agriculture classifications for highly productive farmland.⁷ Most of the land in the UGA expansions are also currently used for agricultural production.⁸

“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.⁹ The American Farmland Trust estimates that between 2001 and 2016, 97,800 acres of

² *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.

³ American Farmland Trust, *Farms Under Threat Washington* webpage accessed on June 16, 2020 at: <https://csp-fut.appspot.com/> and map of nationally significant farmland is enclosed with this letter.

⁴ Julia Freedgood, Mitch Hunter, Jennifer Dempsey, and Ann Sorensen, *Farms Under Threat: The State of the States* p. 64 (American Farmland Trust: 2020) accessed on June 16, 2020 at: https://s30428.pcdn.co/wp-content/uploads/sites/2/2020/06/AFT_FUT_StateoftheStates.pdf.

⁵ *Id.*

⁶ Soils Pasco Proposed Urban Growth Area (UGA) Expansion June 2020 enclosed with Futurewise's June 15, 2020 comment letter on the Draft Environmental Impact Statement (Draft EIS); Soil Map—Franklin County, Washington (Pasco UGA Expansion NW Part) pp. 1 – 23 (6/4/2020) and Soil Map—Franklin County, Washington (Pasco UGA Expansion NE Part) pp. 1 – 28 (6/4/2020) both on the data CD enclosed with Futurewise's June 11, 2020, letter to the City of Pasco.

⁷ 7 Code of Federal Regulations (CFR) § 657.5(a) & (c).

⁸ Soil Map—Franklin County, Washington (Pasco UGA Expansion NW Part) p. 1 (6/4/2020) and Soil Map—Franklin County, Washington (Pasco UGA Expansion NE Part) p. 1.

⁹ *Economic Development Plan Franklin County, Washington* Res. 2016-211 p. 5 lasted 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.”

agricultural land was converted in Washington State “enough land to generate \$61 million in annual revenue.”¹⁰ Given the economic value of agriculture to the City of Pasco and Franklin County and the productivity of the farmland in the proposed UGA expansions, we urge the Planning Commission to recommend denial of the proposed UGA expansions.

The proposed UGA expansions will interfere with future expansion of the Tri-Cities Airport and bring residences closer to the airport, making operations more difficult and adversely impacting the new residents

Like the high-quality farmland, the Tri-Cities Airport, is an important regional economic asset.¹¹ Unfortunately the UGA expansion will cutoff future expansion opportunities at the north end of the runway.¹² The planned residential uses close to the airport will adversely impact the operations of the airport and the airport operations will adversely impact the residential uses. This is another reason to recommend denial of the UGA expansion.

The Draft EIS does not comply with SEPA and the City cannot amend the comprehensive plan to select a UGA expansion until a SEPA compliant Final EIS is prepared

One of the important functions of an EIS is to disclose information on the environmental impacts of proposed actions such as the adoption of the UGA expansions. As the Washington State Supreme Court has repeatedly stated “SEPA policy is to ensure through a detailed environmental impact statement (EIS) the full disclosure of environmental information so that it can be considered during decision making.”¹³ This is one of the reasons why WAC 197-11-070(1) provides that “[u]ntil 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: ... Have an adverse environmental impact ... or ... Limit the choice of reasonable alternatives.” Without the Final EIS it is not possible to fully understand the environmental impacts of a decision such as where to expand the UGA. This is particularly the case here where the Draft EIS is not adequate because it fails to disclose important information including that much of the farmland in the UGA expansion area is designated by Franklin County as agricultural lands of long-term commercial significance. The Draft EIS also did not analyze the impacts of the airport on the residential uses the comprehensive plan calls for (north and west of the Tri-Cities Airport) or the impacts of this residential development on the future expansion and operation of the airport. There are other deficiencies with the Draft EIS as well, as discussed in the attached letter from Futurewise

¹⁰ American Farmland Trust, *Farms Under Threat: The State of the States Agricultural Land Conversion Highlight Summary* Washington p. *2 (2020) accessed on June 16, 2020 at: https://storage.googleapis.com/csp-fut.appspot.com/reports/spatial/Washington_spatial.pdf and enclosed in a separate email.

¹¹ “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/>.

¹² Proposed LU-1 Future Land Use Map.

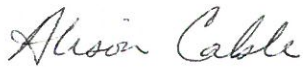
¹³ *Barrie v. Kitsap Cty.*, 93 Wn.2d 843, 854, 613 P.2d 1148, 1154 (1980).

City of Pasco Planning Commission
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to Rick White, Planning Director, June 15, 2020. It is both unwise and illegal for the City of Pasco to recommend and adopt comprehensive plan amendment MF# CPA 2020-001, the UGA expansion, until a SEPA compliant Final EIS is issued.

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

Very Truly Yours,



Alison Cable
Tri-Cities Program Manager



Tim Trohimovich, AICP
Director of Planning & Law

Enclosures

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