



## EXHIBIT J

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Department of Transportation**

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June 15, 2020

City of Pasco  
Community and Economic Development  
525 N. Third Avenue  
Pasco, WA 99301

Attention: Rick White, Director

Subject: City of Pasco – Comprehensive Plan 2018-2038 SEPA Draft  
Environmental Impact Statement

WSDOT is reviewing the City of Pasco Comprehensive Plan: Non-project Draft Environmental Impact Statement and the Comprehensive Plan 2018-2038 update draft documents. We commend you for your efforts. We have the following comments.

### **SEPA Draft Environmental Impact Statement**

#### **Transportation Impacts and Mitigating Measures**

The impacts to the state system are partially identified for all three alternatives. The City is exploring Transportation Demand Management (TDM) measures as a way to reduce impacts and we applaud this effort.

The documents state that Pasco will implement TDM methodologies to limit and manage demand on and access to the major facilities of I-182 and US 395 (Draft EIS Section 4.9.3 Mitigation Measures, page 46). We understand the TDM methodologies have not yet been developed, but will more likely happen through the land development process. A funding source and implementation schedule has not been identified to assure that these measures will mitigate transportation impacts.

The Draft EIS, section 4.9.1 on page 44, states: “The Washington State Department of Transportation is responsible for maintaining an adequate level of service on these highways.” We believe this statement is misleading or inaccurate. With no development in the Tri-Cities, the I-182 bridge could expect to function within acceptable standards for many years to come. The US 395 bridge could be more easily managed. Development is driving the need for transportation management and the proposed development in the UGA expansion area will certainly contribute to the need for improved management. It is the responsibility of the whole region to address impacts to the state system.

The City is also amending the Municipal Code to allow more housing variety, more density, and more of mix of land use types including housing near to commercial centers as opportunities for employment, shopping, and services. It is hoped this will reduce vehicle trips.

The planned expansion of the industrial area along US 395 north of I-182 does not include transportation connection of residential (housing) to industrial (jobs) without using the State system.

We encourage the City of Pasco to plan for the future development and growth of the Tri-Cities Regional Airport. The demand for commercial passenger air service as well as air cargo are forecast to increase as time goes on. Airports with existing commercial service will play a vital role in trying to meet the demand for air service. SeaTac International Airport is reaching the limits of its capacity and existing commercial service airports will be needed to help meet the demand. The Tri-Cities Regional Airport in Pasco is critical to the region's transportation system providing air passenger and cargo service to southeast Washington. It is Washington's fourth largest airport. Passenger traffic grew over 25% between 2015 and 2019. The Airport Master Plan shows future plans to potentially extend runway 12 – running southeast to northwest – 1,850 feet to the northwest. In order for the Tri-Cities Regional Airport to continue its regional function, it is important to preserve the ability to expand. We believe it is important for the City of Pasco to work with the Tri-Cities Regional Airport sponsors and management, aviation businesses, general aviation pilots, ports, and the Aviation Division of WSDOT, and convene formal consultation between the stakeholders to discuss the potential impacts to the Airport.

***Suggested revised mitigation measure:*** The City will prioritize and implement travel demand methodologies identified in the City of Pasco Draft Comprehensive Plan to limit and manage the demand on and access to transportation network, including the major facilities of I-182 and US 395, and the river crossings. This will include identifying funding sources and an implementation schedule.

#### **Draft Comprehensive Plan and supporting documents–**

The following are our initial comments on the draft planning documents:

1. As stated above, the planned expansion of the industrial area along US 395 north of I-182 does not include transportation connection of residential (housing) to industrial (jobs) without using the State system. We understand the City is updating its Municipal Code with the intent of increasing connectivity. The expectation is this will increase travel accessibility for all modes. We support this effort.

We understand there are future plans to designate Clark Road as a collector and it is hoped that it can be upgraded to ensure adequate capacity. However, this action is

not identified in the draft documents. These improvements can offer some help in handling some local internal trips, but it would involve a lot of out-of-direction travel. Clark Road is one mile north of Powerline Road/Burns Road. There are a large number of dwellings between Road 36 and Road 100 north of I-182 with many more planned. We believe Powerline Road also needs to be extended to Glade Road (about one mile) and Foster Wells Road (another mile, but probably requires grade-separation over the railroad lines). Powerline Road is conveniently placed for these large number of dwellings and should be developed as a collector or arterial. This corridor could extend from Shoreline Road in the west to Pasco Kahlottus Road in the east, a distance of more than 14 miles and improves local transportation network connectivity.

#### Transportation inventory / modeling

2. The Capital Facilities Plan Analysis includes Synchro modeling results for the year 2024 for Rd 100 and Road 68 EB & WB off ramps. We understand the City has results for 2038 for all of the interstate/highway interchanges and river crossings. We would like to see this information included in the Comprehensive Plan.
3. The Benton Franklin Council of Governments' model shows severe problems with both the I-182 and US 395 bridges in 2038, but the draft materials do not discuss these important transportation features. It is most likely these impacts will need to be addressed through reduction in demand. As stated above, the City has plans to change Municipal Code and implement TDM strategies with the hope of reducing trips.

#### Funding

4. In Volume 2-Supporting Analysis, in the Recommendations section on page 119, it states that "Some projects will be the City's responsibility; others will be the responsibility of WSDOT, and in many cases, developers will be required to construct improvements associated with proposed subdivisions or other developments." WSDOT does maintain and operate the state highway system. However, as stated above, development is driving the need for transportation management and it is the responsibility of the whole region to address impacts to the state system. We would like the phrase "others will be the responsibility of WSDOT" to be rephrased.
5. PMC 3.40.100 established the "I-182 Corridor Impact Fund". We understand that traffic impact fee requirements, fees, and applicability are being evaluated through the Transportation System Master Plan. We note that a number of projects could draw on it even if they are not on or do not intersect I-182. It seems this would be an important sources of funds to address impacts to I-182.
6. A number of funding sources are described in the Capital Facilities Plan Analysis on pages 34-40. In Volume 2 – Supporting Analysis, Tables T-10 (pages 106-107) and T-11 (pages 110-117) list a number of funding sources. It would be helpful to have similar descriptions for these funding sources as well. These could be included in the

Capital Facilities Plan Analysis, or it would be most convenient to have the descriptions in the Finance section of Volume 2 beginning on page 119.

7. Please include funding sources for the planned TDM measures.
8. We understand that you will add a map showing the changes in land use designations in the Land Use Element of the Comprehensive Plan.

Thank you again for the opportunity to participate and provide comments. If you have any questions regarding these comments, please contact John Gruber at (509) 577-1636.

Sincerely,

A handwritten signature in cursive script that reads "Paul Gonseth".

Paul Gonseth, P.E.  
Planning Engineer

PG:jg

cc: Kara Shute, Area 3 Maintenance Superintendent