

June 10, 2020

City of Pasco Planning Dept.

gonzalezjb@pasco-wa.gov

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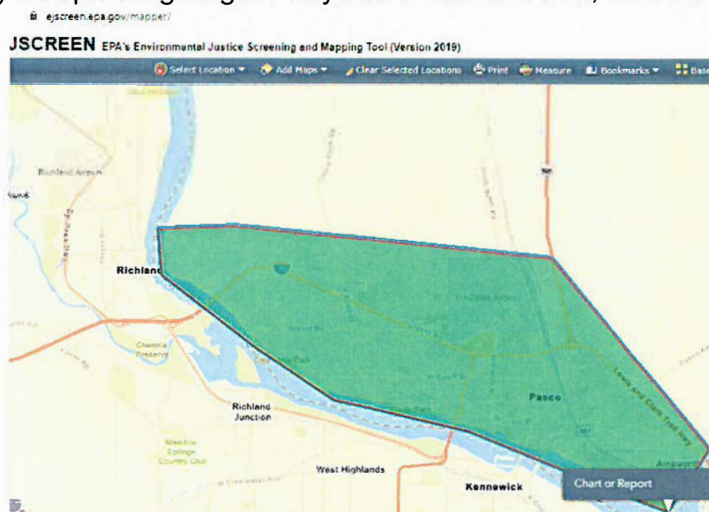
JUN 10 2020

COMMUNITY & ECONOMIC DEVELOPMENT

Thank you for the opportunity to comment on the Draft EIS for Pasco's Comprehensive Plan Update. Please consider the following concerns and comments. I am not a Pasco Resident but have many friends I visit regularly, as well as working at special events at the HAPO Center. Regardless of my time in Pasco, it is inextricably connected with Kennewick and Richland, with a significant share of Hanford workers as well as medical staff at Kadlec, and PNNL employees who commute into Richland (burdening us). Ideally the Four-Cities should be planning as a whole.

The following comments address the EIS from a general perspective.

First, I am concerned about an apparent lack of information regarding outreach to Spanish speaking residents. You may very well have conducted specific outreach to the Spanish speaking community - but it was left out of the public relations plan or primary document. Please indicate what effort was made in the final document, or delay the process until the process can be more inclusive. Based on US EPA Title VI of the Civil Rights Act I would think Pasco, which has a 54% Hispanic population according to the last American Community Survey, with nearly half who self identify as speaking English anywhere from not well, less than well, less than very



well, or not at all totalling 53%.

Utilizing the EPA's Environmental Justice screen to learn about Pasco ("user specified area" is depicted in green), I confirmed what I already suspected. Pasco residents are disproportionately burdened by traffic noise, air pollution, and exposure to diesel dust. Though you couldn't have anticipated this while the document was in production it is worth recognizing that unaffordable and crowded housing, difficulty getting to work safely by bike, on foot or transit, exacerbate the Covid-19 pandemic. It is reasonable to anticipate future disease outbreaks, excessive heat events, and summer wildfire smoke and design the community to be more resilient.

The User Specified Area, WASHINGTON, EPA Region 10 (Population: 72,120)

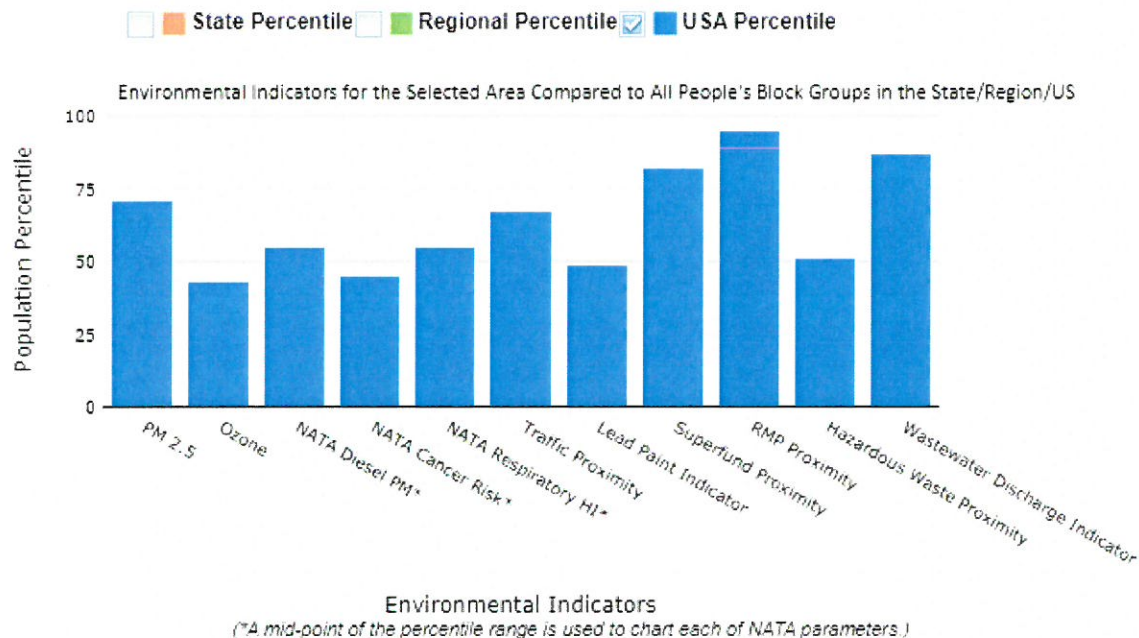
Environmental Indicators

Demographic Indicators

EJ Indexes

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| <input checked="" type="checkbox"/> PM 2.5 | <input checked="" type="checkbox"/> Ozone | <input checked="" type="checkbox"/> NATA Diesel PM |
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| <input checked="" type="checkbox"/> Lead Paint Indicator | <input checked="" type="checkbox"/> Superfund Proximity | <input checked="" type="checkbox"/> RMP Proximity |
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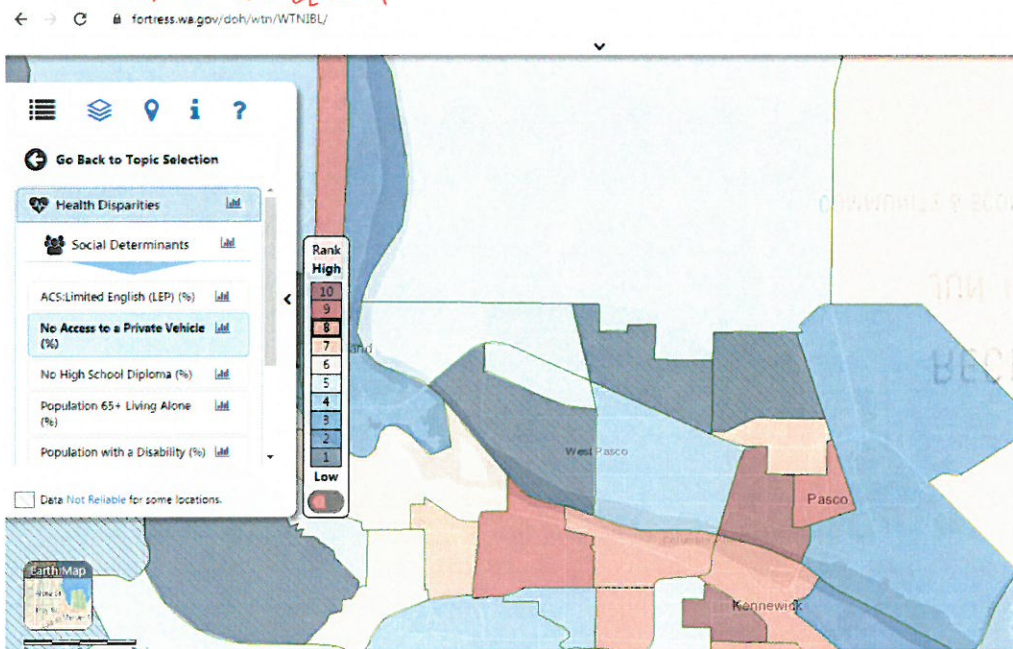
Of course you are aware there is a lack of affordable housing in much of Pasco, where people are spending more than 30% of their income on rent or mortgages. This forces people to live in overcrowded conditions. According to WA Dept. of Health, 11% of Franklin Co. residents live more than one person per room. Historically, that may have been just considered an inconvenience. But with COVID, we see how overcrowded living puts people and communities at higher risk for the spread of disease.

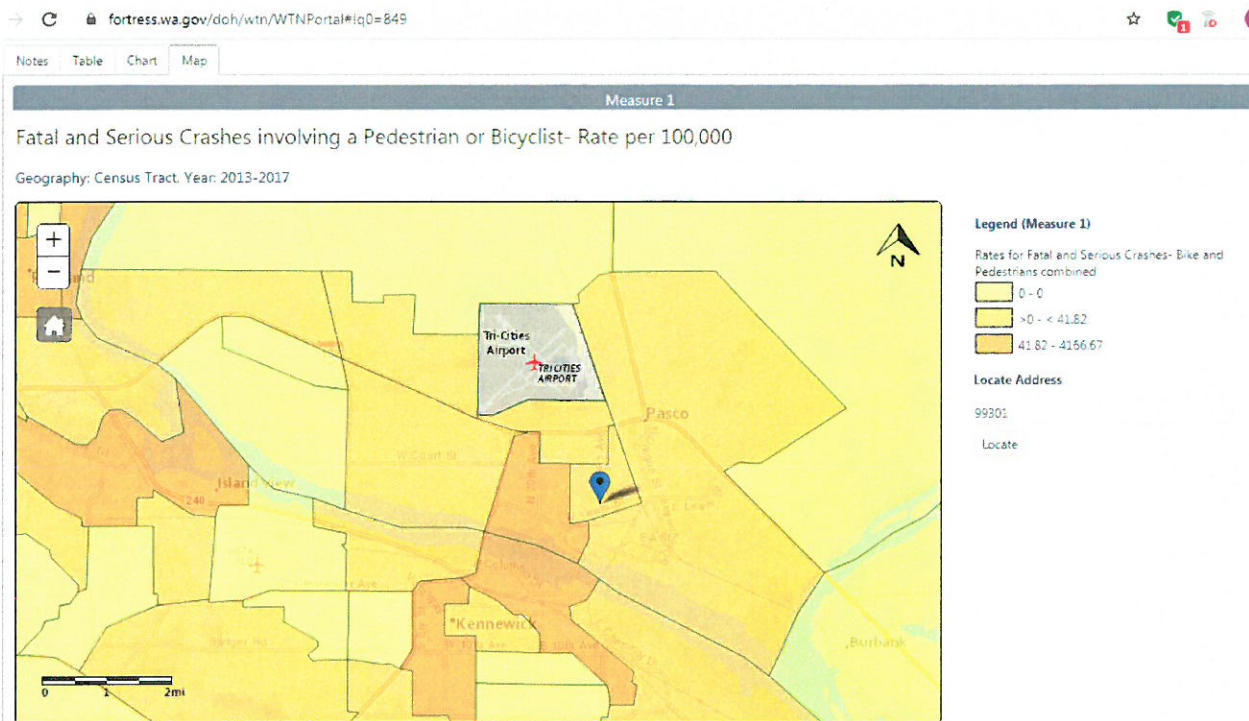
This is not just renters. BentonFranklinTrends.org shows about 47% of residents in both counties - nearly 12,000 homeowners are paying more than 30% of their income on shelter. Because it is combined data I was unable to determine what share of that is within Pasco City limits, but one can assume at least a third, since you have the biggest population.



Using the WA Dept. of Health Washington Tracking Network I confirmed that in neighborhoods throughout the city, up to 50% of residents don't have a personal vehicle. If the transit system is not easily/safely accessible, that puts them at risk for unemployment, may lead to poor health outcomes if they can't get to a doctor, etc. It is great that people carpool from a greenhouse gas perspective, but ensuring safe routes to work and school without needing a car would benefit many households. The cost to maintain a car is estimated at about \$8K a year. Safe access to multi-modal transportation would improve people's quality of life and give them more spending power for housing or to contribute to local businesses.

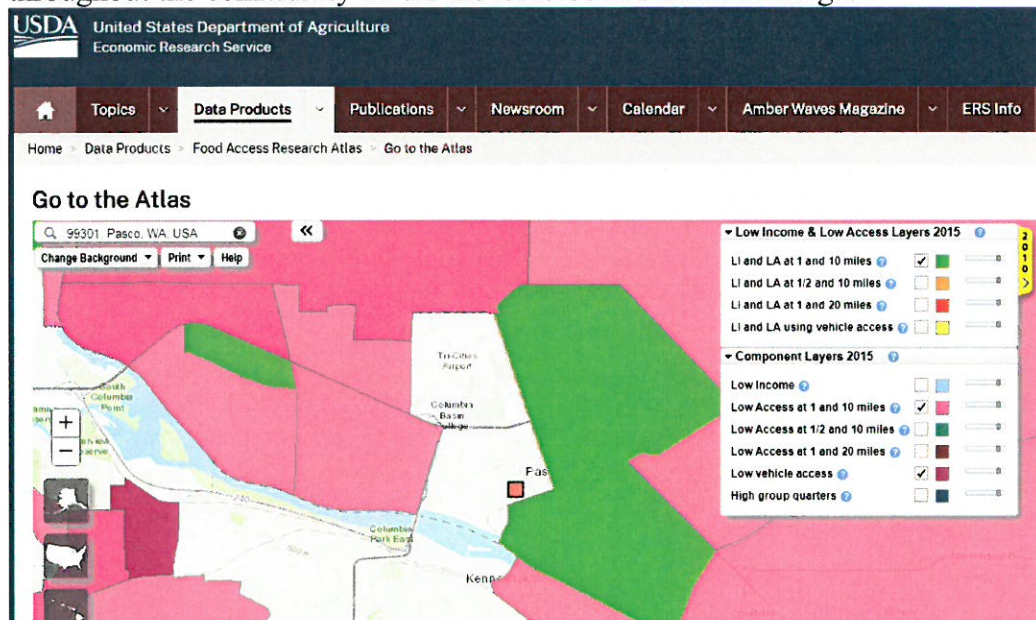
Transportation





Pasco has two 'food deserts' in the area along Chapel Hill Blvd., and far east Pasco. USDA defines a food desert as "Low access to a healthy food retail outlet ... more than 1 mile from a supermarket or large grocery store in urban areas." Whether a store is 'accessible' may be further compounded by lack of a personal vehicle (poverty, aged) or unavailable public transportation. Consider living in Lovisa Farms or the Riverview neighborhood and losing your ability to drive. How would you get groceries? Even if you were not a low income person, it might become difficult.

The preferred alternative does embrace mixed use and increased density, but there are a few more places throughout the community where it should be allowed/encouraged.



I hope Council will support Alternative 3 - Compact Growth - which is listed as the preferred alternative.

Pasco has an amazing opportunity to grow slowly and carefully, working to infill unused, or under-used areas in central Pasco. You are able to ensure housing is available to people at various ages and stages of life, and various economic levels - across the city. Don't just keep all the poor folk on one end of town. A perfect

location to focus on active revitalization is near the Post Office. I know Goodwill uses the old K-Mart, but that plaza area is still underutilized and ripe for mixed use, and there is vacant land adjacent.

At a recent Planning Commission meeting, some developers asserted they should be allowed to set zoning. But developers create burdens on communities. Yes, they obtain permits and pay developers fees, but the infrastructure, once turned over to the city, becomes a liability. All the residents (taxpayers) pay to maintain it. Many developers don't even live in our communities. If you allow developers to build sprawling tracts, with concentric circles and cul de sacs, the city is left to plow and pave miles of streets that essentially serve as private driveways.

Further, those dead-end neighborhoods without outlets to the nearby arterial (sometimes behind a fence) require people to go well out of their way to access services. Take for example, 5613 Maryhill Lane. It is 1.28 miles to Yokes because they do not have an easement from their neighborhood to Sandifer/Convention Drive. Their neighbors at 6809 Boulder have only $\frac{2}{3}$ mile walk to Yokes because an easement was left from the neighborhood to the arterial.

I hope you will not only stick to the proposed mixed use and higher density in Alternative 3 but require standard gridded neighborhoods or (at least) easements out to arterials. More traditional grids are better for everyone. Within and around those neighborhoods, consider appropriate speeds to encourage safe, multi-modal transportation.

Regarding the Broadmoor development, please work with the developer and BFT to ensure that the Mixed Use Regional includes a bus transfer station. It is the most logical location for Delta HS kids as well as commuters into Richland.

I was particularly excited to see the intersection of Rd. 68 and Argent listed as mixed residential commercial and I encourage the city to encourage LITERAL mixed use in the same buildings with either live-work units, or residential above commercial units. It would add some character and improve the quality of life for everyone along Argent to not have to cross the highway for some services.

My last general comment is that there is no mention of water supply. The Quad Cities water right is finite and required the cities to take conservation actions. Ironically at the time it was negotiated the city forced a Desert Plateau resident to rip out perfectly fine shrub steppe plants, and put in irrigation and turf grass. There should be no mandate that people put in lawns as they are a notorious waste of water. Trees use less water and are more beneficial by decreasing the heat island effect and stormwater, and increasing property values. They should be broadly encouraged and even required in some cases.

Subsequent comments relate to specific elements of the EIS as noted.

3.1.1 Increased Density and Development

I am so excited to see Pasco promoting the idea of mixed use and walkable neighborhoods. You will need to stay committed to the zoning you choose and not allow developers to get waivers and build 'the same old stuff'.

That said, the map leaves out some obvious places where mixed use should be allowed.

The parcels across from the post office could support mixed-use making better use of those blocks. The strips haven't been 100% full since K-Mart died. There is plenty of space to 'thicken up' the area with some affordable housing, and create a little neighborhood center.

The corner adjacent to the BFT transit center would be perfect for a small mixed use, live work, multi-story complex. BFT as a quasi government agency may be able to surplus the land for affordable housing per RCW 39.33.015 which reads –

Cities, towns, and other political subdivisions may transfer, lease, or dispose of property at low or no cost for affordable housing and related facilities for low-income and very low-income households, as defined under RCW 43.63A.510, consistent with local regulations and comprehensive plans.

The SW corner of 20th and Lewis should also be mixed use, or missing middle housing - duplexes, fourplexes, etc. It would likely lift the neighborhood and that nasty hotel on the north side might be demolished or upgraded. The fancy place overlooking the river is zoned mixed use, why not the huge lot too?

Promote ADUs, and remove requirements that only a family member can live in them. Many people might invest in them if they knew it was allowed, and that would be a perfect solution for 'thickening' the areas from 40th west to Riverview without having to build more city services.

3.1.2 Traffic

While additional population may lead to more cars, sincere efforts to improve multimodal transportation, and make cycling, walking and rolling safe within the City of Pasco may lessen the need for every household to have multiple vehicles. You should be working with BFT to provide a suitable location for a transit center and park and ride for commuters who go to Richland. Also, get rid of minimum parking requirements for commercial areas. "Free" parking is expensive. **"Parking is expensive to build: a typical surface parking stall costs between \$5,000 and \$10,000 to construct (including the value of the land it occupies). A parking space in a garage can cost \$25,000 to \$50,000."**

<https://www.strongtowns.org/journal/2018/11/20/the-many-costs-of-too-much-parking>

Ensuring new neighborhoods have ready access to services (e.g. mixed use) would give people the choice of running errands by bike or foot. The current wide boulevards with high speeds are not conducive to running everyday errands on a bike despite bike lanes being present. The meandering sidewalks - while slightly more aesthetically pleasing to some people - literally increase the distance one has to travel. Furthermore, if one is pushing a stroller it requires actual effort to constantly turn it.

3.1.3 Open Space and Natural Areas

Working to improve habitat along the Columbia River shoreline, and preventing homeowners from messing with it, should be a top priority. Personal views should not be more important than access to nesting, perching and feeding habitat. I know the city is hoping to lower the dike and hope, if possible, an effort will be made to plant red-osier dogwood, willow, and rose. The river trail in Richland north of the Hains St. Dike, where there is habitat, is very popular with residents because of all the wildlife sightings.

3.1.4 Healthy Community

The increased density can support a healthier community but will require some thought to street speeds and infrastructure. For example, businesses with a steady stream of customers - like restaurants and coffee shops - should be required to have bike racks to supplement this section. Please add bike racks and a safe path from the sidewalk to the entrance as bulleted items in this section, as you have LID in the water section. (I live near Steptoe and Gage and there is no safe access by foot or bike to Dairy Queen without crossing the parking lot or riding in a traffic lane. They had no bike rack for many years, but I believe they do now.)

Please don't leave the old neighborhoods behind, but rather incorporate appropriate street speeds (reducing if necessary) and implementing road diets. The entire length of Sylvester, for example, does not warrant such wide lanes or high speeds and could serve the central and historic Pasco neighborhoods better with protected bike lanes, and shaded park strips east of 395.

4.2.3 Surface Water (Mitigation Measures)

Additional measures to suggest:

Require trees in all new developments to absorb rain, help ameliorate some stormwater issues and combat the urban heat island effect.

Consider levying stormwater assessments based on the amount of impervious surfaces - three car driveways impact stormwater more than two car driveways. Keeping water on the lots minimizes the need for stormwater detention basins which sometimes don't perk, and can harbor mosquitos.

Require a percentage of pervious paving and onsite swales for commercial establishments.

4.3.3. Plants and Animals (Mitigation Measures)

This entire section is hopeful.

- Consider landscaping with native plants to provide vegetation of habitat significance in streetscapes, buffers for stormwater swales, rain gardens, and other habitat features. YES!!

This should be added in the stormwater management section as well. Also suggesting low-impact development should go in 4.2.3.

Excellent bulleted items at the bottom of p. 29 and top of p. 30. - these principals should be encouraged in established neighborhoods as well.

4.4.3 Land Use (Mitigation Measures)

Bullet 3 - Creating live work units to decrease traffic - YAY!!!

Bullet 5 change Allow to ensure? Please make sure adequate parks or open space is required.

Other mitigation

- LU-2-B Policy: Facilitate planned growth within the City limits and UGA, and also promote infill developments in the City limits. YAY!!

However I am concerned that the highest density zoning is only near the railroad and airport. Surely there can be some denser pockets distributed across the community?

- LU-3 Goal: Maintain established neighborhoods and ensure new neighborhoods are safe and enjoyable places to live. YAY!!

4.5 Environmental Health

This section addresses industrial land use in proximity to housing, however a large number of residents are impacted by poor air quality, diesel, as well as noise due to proximity to the highway. The city should begin working with WSDOT to build sound walls or plant trees (or both) to buffer sound. This is an environmental justice issue.

In anticipation of extreme heat, consider adding the planting of trees to zoning requirements. UW Climate Impacts group expects an additional XX days of 100 plus temperatures. Central air conditioning is not ubiquitous in Pasco, and some residents can't afford it even if they have it.

Again thank you for your work on this.

Ginger Wireman
2435 Michael Ave.
Richland, WA 99352