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COMMUNITY & ECONOMIC DEVELOPMENT



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July 8, 2020

City of Pasco
 Pasco Planning Commission
 Attn: Jacob Gonzalez, Senior Planner
 525 N 3rd Avenue
 Pasco, WA 99301

Email: CompPlan@pasco-wa.gov

Re: City of Pasco Comprehensive Plan Non-Project EIS, dated May 2020

Dear Mr. Gonzalez,

Thank you for the opportunity for Ben Franklin Transit (BFT) to comment on the City of Pasco Comprehensive Plan Non-Project Environmental Impact Statement (EIS) for the City's Draft Comprehensive Plan Update (Comprehensive Plan or Plan). As you are aware, there is a close relationship between land use planning, transportation planning, and transportation-related environmental outcomes. The Comprehensive Plan is a document that articulates the city's vision on how it will grow, and that necessarily shapes not just the look and feel of the city, but how the city will perform economically and environmentally, and in how the City will manage the transportation challenges that come with that growth. The Plan will shape the quality of life for current and future citizens, and it will determine where in the region its citizens will work, shop, and play. It will also determine how people will move between these activities.

QUESTION: Will future residents in Pasco be more likely (or even able) to use transit?

The answer depends on the extent to which the goals and objectives of the current Plan can be implemented and improved upon in future updates to the Plan. As the region's transit agency, BFT has little influence over our operating environment; the road and highway network, as well as land use, are all controlled by city, county, and state governments. BFT controls the operation of buses, but transit operates primarily on city streets and serves residential neighborhoods and commercial areas planned also by the city. The Comprehensive Plan lays the groundwork for the city's growth and development, including the transportation system and allowable land uses.

The focus of BFT's review of the Plan and EIS is on those factors that affect the delivery of transit service, influence ridership on the transit system, and provide opportunities for residents to utilize the transit system. BFT's comments extend to active transportation modes, since transit passengers always "walk" or "roll" to access transit. BFT's comments also extend to land use, since density and mixed use provide the critical mass of people for public transit to be most effective. BFT's response includes comments on statements of fact and data articulated in the Comprehensive Plan and EIS documents, but BFT generally did not comment on plan goals or aspirational statements, except where they appear to be contradictory to other information presented or broadly unrealistic.

Objectivity among the Documents

BFT noted that the EIS was prepared by White Bluffs Consulting with the support of Oneza & Associates and JUB Engineers. The Draft Comprehensive Plan that is the subject of this review was prepared by Oneza & Associates with the support of JUB Engineers and White Bluffs Consulting. That is, the consultant team that prepared the Comprehensive Plan Update is the same consultant team that conducted the EIS review.

That the same consultant prepared the Comprehensive Plan and then conducted the EIS may give the appearance that there was no opportunity for an objective EIS review of the Plan. Biases that may have been introduced into the Plan are almost certain to be overlooked in the EIS. Opportunities and ideas that may have been missed, omitted, or neglected in developing the Plan cannot be identified by the author-reviewer during the EIS review phase. Likewise, deficiencies that were introduced into the Plan by the author are not likely to be found by the same author during the EIS review phase. In future comprehensive planning efforts, BFT recommends that two different firms or teams of firms be considered for plan development and subsequent environmental reviews.

BFT as a Stakeholder

BFT noted that neither the Comprehensive Plan (Vol. 1, p. 3) nor the EIS (§1.7, p. 4) include BFT among the list of stakeholders that were consulted as part of development of the Plan. BFT was, however, asked to comment on the draft EIS after it was published and released for public review.

BFT appreciates participating in the review of the EIS, but it may have been appropriate to include BFT, as the region's transit agency, in an earlier stage of the plan development process. BFT's late inclusion in the consultation process appears to have inhibited meaningful consideration of transit into Pasco's planning framework.

Housing Growth and Household Size

BFT noted that the Plan forecasts housing needs as a function of long-range population growth within a static and unchanging average household size of 3.17 (e.g. Table 1 related text in the EIS). The data tables are not sufficiently detailed in that household size is applied across all housing types, but the average household size does appear to remain static even as the City changes the housing mix.

Nationally, average household size has declined steadily and consistently for 160 years; only since 2010 has household size seen a slight increase. These long-term trends reflect both a declining birth rate and a reduction in extended (multigenerational) family living. The recent trend toward an increasing

household size is at least partly attributed to the Great Recession, where an increasing number of “extra adults” (boarders and roommates, and sometimes adult children) resided in homes. “Extra adults” in households were most commonly in the 35-54 and 55-64 (working adult) age groups. The current COVID-19 pandemic may have short- or longer-term economic effects that resemble the effects of the Great Recession and result in an increase in unrelated adult households.

It seems unlikely that household size in Pasco will remain as a constant in the face of changing national trends, economic uncertainty, and demographic change. It is highly probable that household size will change, reflecting long-standing shifts in the composition of households and demographic trends, and this is especially true if the City adds smaller, higher density, and mixed-use housing as proposed in the Plan.

The types of homes, neighborhoods, and transportation used by a family of two adults with children in single-family houses will be very different from the expectations of a household with multiple unrelated adults, a multigenerational household, or smaller families and individuals that may seek higher density mixed-use housing of the type that is envisioned in the Plan. The assumption that household size is static over time may be unrealistic, and it may lead the City to plan for today’s families, leaving fewer options that respond to the needs of future generations.

Density and Land Capacity

Table 2 and related text identifies the available land capacity as land that is currently vacant and developable, while the number of housing units that can be accommodated on that land consists almost exclusively of larger lot single-family houses. Within the existing city limits, density is less than 3.5 dwelling units per acre. Within the urban growth area (UGA), the density target is just under 5.5 dwelling units per acre. The target density for the Broadmoor area is unclear, given the data presented (and still uncertain, given the lack of an approved development plan). The implication of the density target, however, is that most higher density land uses will be located along the fringes in new development areas. This may avoid conflict with existing residential areas, but it does not lead to walking, cycling, or transit to become viable transportation options.

Transit-supportive urban density works best through a corridors and hubs approach, where high density mixed-use development hubs are linked by corridors that are also higher in residential and retail densities. In general, redevelopment of existing areas at higher densities, such as downtown Pasco, and linking those with higher density development along a continuous corridor to other destinations, such as the Road 68 retail area, offers greater potential to improve transit and active transportation than spreading higher density developments out into undeveloped areas. This approach may generate fewer complaints from existing residents, but it comes at the expense of being able to provide effective walking, cycling, and transit to future generations as the City eventually infills and urbanizes to accommodate continued growth.

Residential Land Use Density Thresholds

Table 3 and related text presents the acreage of existing municipal, UGA, and proposed UGA land areas by land use type. Residential is characterized as low, medium, medium-high, and high density, with the vast majority of land zoned as low density residential. Commercial areas include single-use categories of

commercial and office, as well as a number of mixed-use categories with labels that are more indicative of where the development is than what urban form it takes (e.g. “mixed-use interchange”).

This table—and every discussion of density—needs to incorporate the measures of density if it is to be useful in the analysis of transit or active transportation modes. Density is the most important factor that increases utilization of transit, walking, and cycling (coequal with street network connectivity in importance). The number of dwelling units per acre is the common measure for residential density, while total acreage and floor-area ratio (FAR) provides the density measures for commercial and industrial development. Both measures should be provided for mixed residential/commercial zones.

City and Neighborhood Character

Chapter 3 begins by saying that “Densities will be increased under the preferred alternatives, which may significantly impact the character of the City, especially in the Broadmoor area and the area to the north proposed for future UGA expansion. Some areas in existing single-family neighborhoods may have increased densities and infill developments in both action alternatives 2 and 3.”

First, it is unclear what is meant by “character” in this context. Character encompasses a range of physical components of the built environment including building use and height, architectural style and materials, building setbacks and density, street width and layout, vegetation and landscape, topography, and other factors. The term “character” is widely used in plans throughout the United States and beyond, but the term is also the subject of controversy and criticism precisely because a definition of “character” is highly subjective, almost always a matter of individual taste and preference, and rarely given a specific definition in planning documents. In short, “character” is just a personal opinion; yet, the term “character” (referring to community aesthetic or environmental context) is used approximately six times in the EIS. Each use of the term “character” occurs in a different context and with a potentially distinct meaning. If a common definition of “character” does not exist, how can anyone determine when “character” has been significantly impacted or altered? Moreover, is changing the City’s character necessarily an undesirable outcome?

Second, neither the data presented nor the explanatory text support a finding that the City’s character (whatever that may mean to an individual) may be “significantly” impacted by the plan alternatives 2 or 3. Density (3.5du/acre) in areas currently developed is not planned to change, except through infill development at comparable density of development; the development of permitted lots that are currently vacant in existing neighborhoods does not necessarily lead to a change in neighborhood character. Density in undeveloped areas (5.5du/acre) in future development areas—areas that are not currently developed—will not necessarily affect the character of existing neighborhoods that are located in other parts of the city. Even the text, as worded, acknowledges that there may be no impact to overall density in existing neighborhoods, except to the extent that infill development at currently allowable densities may take place.

Housing Variety and Choice

The EIS (p. 12) states that “Alternative 3 will have a variety of housing styles, including cluster and multi-family housing, and will impact less area in the unincorporated part of the County.” We interpret this to

mean, using simplified language, that “the plan provides for a variety of higher density housing options, requiring less expansion of the urban growth area (UGA).”

A diverse mix of housing may be desirable to attract a more diverse population. Transit service thrives when there is a mix of higher density housing, ranging from small lot homes to accessory dwelling units, condominiums and apartments, and townhouses, especially where those housing types are integrated with retail and office as mixed-use developments. We encourage this approach to development, as long as the higher density development is located along major arterials where transit operates and as long as the City improves pedestrian access to development along these arterials.

However, the data presented in Table 3 (and LU-2) and elsewhere in the text (including the lack of data and discussion) do not support this statement of finding in the EIS. Table 3 indicates that 79% of Pasco’s residentially zoned land area will continue to be devoted to low density (single-family detached) housing. Medium density housing will occupy 17% of the residentially zoned land area, while medium-high and high-density housing will occupy a combined 4% of residentially zoned land area. The data in Table 3 reaffirms Pasco’s commitment to predominantly large lot, single-family housing. The key takeaway from this is that it is possible that the City has an aspirational goal to achieve greater diversity in its housing stock, but it does not appear the Comprehensive Plan as written will necessarily enable that to occur.

Section 3.2, Table 7 states, “Housing meets the 20-year demand with a variety of housing types and residential densities.”

This statement is unsupported by the data presented in the plan. Even alternative (3) maintains large lot, single-family, low density housing (3.5-4.0 du/acre) as the dominant residential land use for nearly 80% of the future land area. “Medium density” housing (17% of residential land use) may still include single-family detached and attached housing on smaller lots (e.g. 6.0-10.0 du/acre). The dominance of residential land area devoted to single-family housing does not suggest or accommodate a “variety” of housing types and densities.

Density and Traffic

Section 3.1.2 states, “The additional traffic generated by the increased housing densities, and commercial, and public facilities land uses could impact existing traffic patterns. Both action alternatives would result in a substantial increase in traffic volume...”

The use of “could” in the first sentence appears to be speculative and without basis in analysis. The subsequent use of “would” in the next sentence turns the speculation into a foregone conclusion. We can reasonably deduce that any growth scenario for Pasco will result in increased traffic, particularly given that the status quo and both alternatives largely maintain the current development approach that has resulted in increasing traffic levels. However, the Comprehensive Plan and accompanying Transportation Master Plan should not treat this outcome as a foregone conclusion; they should envision a strategy where growth can be accommodated in a way that minimizes transportation system impacts.

Mixed-Use and Traffic

Section 3.1.2 states, “the Broadmoor area in both alternatives will retain more traffic internally due to the increase of mixed land uses.”

In stark contrast to the prior comment (in response to the apparent conclusion that traffic will increase), the plan proceeds to suggest that large-scale expansion of development at Road 100/Broadmoor will have little, or at least limited, impact on the regional transportation network. This statement is not supported by evidence, and it is a highly unlikely outcome. It is unclear how the City of Pasco or the developers of the Broadmoor area will force “more traffic” to remain internal to the area. Highly successful mixed-use developments naturally attract traffic from other parts of a region. Likewise, people who choose to live in a mixed-use development may not necessarily work within the mixed-use area; that is, they may still have to commute to a job in another part of the region even if many of their other activities take place within the mixed-use area. This paradigm can be different for transit-accessible development in regions with well-developed rapid transit systems, but the statement in the local context reflects an improbable outcome.

Mixed-Use, Walkability, Transit, and Health

Section 3.1.4 states, “The City’s zoning code currently allows mixed uses in certain zones with Mixed-Residential/Commercial land use. Both alternatives would promote mixed-use developments as future development is anticipated in the Broadmoor area.”

Although this section is presented in the context of health, a pedestrian-oriented city is also a precursor to making transit accessible to a city’s residents. Mixed-use (residential/commercial) is apparently focused only in the Broadmoor area, an area that will likely be anchored by highway oriented commercial development, dominated by higher income single-family housing, and located within the barriers of I-182, the Columbia River, and the northern urban growth area boundary. Therefore, the Broadmoor area—the only concentration of mixed-use development represented in the Plan—is unlikely to benefit from a quality, frequent transit service. Without effective transit, the traffic impacts resulting from higher density in the Broadmoor area will be more significant than would occur in an area with a well-connected street network. In addition, the amount of land dedicated to mixed residential/commercial uses is minimal. That is, both the scale and location of mixed-use and higher density residential development is likely insufficient to have any meaningful impact on non-single-occupant vehicle mode share, thus contributing to mounting congestion over time from the get-go.

Growth-Reducing Sprawl

Section 3.2, Table 7 indicates that “Growth within the UGA, planned areas would reduce sprawl.”

While the planned action may encourage infill at prevailing residential densities and a slightly higher greenfield development density along the fringes, it is unclear that the proposed action would reduce sprawl. The term “sprawl” (and its variations) is used over 20 times in the EIS, but nowhere is it defined. Sprawl is generally understood to mean geographic expansion of a city with most development occurring through a single-use, low density development.

Under the preferred alternative, a significant portion of growth will occur on previously undeveloped land (even if it is within the UGA) at a density of 5.5 dwelling units per acre—a density which fits within the definition of sprawl.

Transportation Connectivity to Improve Connectivity

Section 3.2, Table 7 states, “Adds new transportation improvements to improve connectivity and street design that supports urban environment. Adds multi-modal travel options.”

Although connectivity and multi-modal travel options are indicated as aspirational goals in the Comprehensive Plan, there is no plan or action that would modify land development and infrastructure design standards to achieve this goal. Policies under Comprehensive Plan Goal TR-2 are encouraging, but “policies to encourage” are not actionable against competing (road) design standards that are mandatory.

Density, Traffic, and Air Quality

Section 3.2, Table 7 indicates that, “A higher density development will involve less land, reduce vehicular traffic, and will reduce impact to air quality and ozone.”

This statement is not supported by any presented evidence. Higher density development, even high-rise developments, whether commercial or residential, located in areas without well-connected streets and a minimum level of transit will still generate high volumes of private vehicle traffic. Absent any other viable mobility options, high density developments will generate more traffic than lower density developments in a geographic area of comparable size.

Land Required for Street Infrastructure

Section 4.4.1, Table 9 includes a footnote that says, “The total includes 4,300 acres of street right of way, which is about 17% of the total land area.”

A well-connected urban street grid (similar to downtown Pasco) that supports higher density development typically results in street infrastructure that covers 28% to 35% of total land area. Disconnected street networks in areas that are not characterized as walkable or transit accessible typically have a street right-of-way coverage of less than 20% of total land area. It is possible to minimize the footprint occupied by roads while maintaining a high level of access, but this approach requires a greater emphasis on pedestrian access than currently exists in most cities.

Planning for Transit Density

Page 32, Comprehensive Plan Land Use Categories, offers the first reference in the EIS to density thresholds. This is a critical element of defining how growth will occur in the Plan, and it seems appropriate to discuss key definitions, including density (along with “character” and “sprawl”) early in the document. The plan defines residential and mixed-use density as follows:

- Low Density Residential means 2 to 5 single-family dwelling units per acre (79% of residential land area).

- As previously noted, this represents a significant portion of the City's residential land that remains devoted to very low-density sprawl.
- Medium Density Residential means 6 to 20 dwelling units per acre (17% of residential land area).
 - This is a wide range of density, coupled with a very permissive range of allowable housing types (defined elsewhere) that can easily be maintained as single-family housing. It is unclear how the City of Pasco seeks to shape urban form in such an overly broad land use category.
- Medium-High Density Residential (2% of residential land area)
 - This category of residential land use is indicated in earlier data tables but not defined, in terms of dwelling units per acre, and not consistently referenced throughout the EIS.
- High Density Residential means 21 units per acre or greater (2% of residential land area).
- Mixed Residential/Commercial means 5 to 29 dwelling units per acre and Commercial development, which lacks a density measure.
 - Measuring mixed-use density with a residential density measure absent a commercial density measure (e.g. floor-to-area ratio, or FAR, which allows the calculation of gross commercial floor area) results in an incomplete measure of density. The lack of density measures for commercial areas is a concern, from a transit perspective.
- Commercial development densities are not defined. Commercial development densities should use FAR as the common density measure.

As a general rule, for transit to be effective and efficient (productive, in terms of service) and to be useful and convenient as a mode of travel (frequent) for the general population, urban development needs to meet a minimum level of density and, where viable, be incorporated into mixed-use developments.

- On frequent bus corridors (every 15 minutes or better), it is generally desirable to achieve a floor-area ratio (FAR) of 1.0 or greater for commercial development and greater than 10 dwelling units per acre in order to exceed a combined 15 residents, visitors, students, and employees per acre within one-quarter mile of the corridor.
- In urban centers (or "hubs") and locations near transit centers (focal points with high levels of connecting transit service), and on corridors planned for bus rapid transit, it is generally desirable to achieve a mixed-use FAR of 2.0 or greater and at least 25 dwelling units per acre, or any combination of commercial and residential development, to exceed 40 residents, visitors, students, and employees per acre within one-quarter mile of the corridor.
- Higher density should be focused within existing urban arterial corridors where transit service already exists. It should never be assumed that transit will be extended to new areas (the lack of street connectivity often precludes the extension of transit into new development areas).
- Major institutions, such as large schools (high schools and colleges), should be planned along transit arterials and not located in fringe areas or within neighborhoods that cannot be served effectively by transit. In contrast, smaller schools serving younger students (e.g. elementary schools) should be deliberately sized and located so that safe, walkable routes to school can be offered within a neighborhood; they should typically not be located along major arterials.
- In addition to increased development density, serious consideration should be given to the current levels of minimum parking required for development projects. Free parking discourages

the use of transit by making it more convenient for people to drive and by making it uncomfortable or more difficult to walk (e.g. crossing a parking lot adds to the trip length and discomfort for pedestrians).

- Where transit is not viable, including areas with irregular or disconnected street patterns and low-density areas, higher density developments should not be allowed. Newly developing areas on the urban fringe are not typically suitable for transit-oriented, high-density development.

Access to Circulation Routes

Page 32, Comprehensive Plan Land Use Categories, states that, “Higher density residential, mixed residential/commercial, and commercial land categories are required to be convenient to major circulation routes.”

What is a “circulation route?” Do “circulation routes” have any relationship to the functional classifications of the city’s street network? What does “convenient” mean, and how is it measured? For example, Broadmoor Apartments and Silver Creek Apartments both have frontages on Chapel Hill Boulevard and are located along I-182. It can be said that they are higher density developments that are “convenient to major circulation routes.” However, they are not easily served by transit, and pedestrian access to any other land use from these higher density residential developments is almost non-existent. They may be convenient for some residents, but they are not likely convenient for people who want to walk, bike, or take public transit.

Commute Trip Lengths

Section 4.8.2 Impacts (Alternative 3) states that “... the land use assumptions of Alternative 3 would potentially decrease the amount [sic] of trips and trip lengths resulting with less [sic] overall impacts to the transportation network than Alternative 2. Increased density in urban areas would most efficiently support new or extended bus routes in addition to more frequent service provided by transit facilities. Similarly, non-motorized transit demand would also increase.”

The most important statement that BFT could make in response to this EIS is this: If increased density requires new or extended bus routes, then the locations proposed for increased density are generally not appropriate for transit-supportive development.

At the levels of density proposed, and especially since all new higher density development is proposed in areas along the fringes, it is unclear that the Alternative 3 land use scenario could “potentially decrease” the number of trips and trip lengths or have fewer overall transportation network impacts; this statement is speculative and probably unreasonably optimistic. This is particularly true for the Broadmoor area which will be isolated between the Columbia River, I-182, and the UGA and only accessible to the region along Road 100. For that reason, it is unclear whether the Broadmoor area could ever support a convenient level of cost-effective transit service within or to the development.

Encourage Complete Streets while Mandating Existing Street Design Standards

Pages 47-48, Section 4.9.3 Mitigation Measures

- LU-1-A Policy: Maintain and apply current design standards for major public investments, particularly streets.

- TR1-J Policy: Encourage developments to meet the mission of the Pasco Complete Street Policy

Unless the current street design standard is a complete street standard, these two policies contradict one another. The policy that “encourages” an action is unenforceable; thus, the current street standard will apply and continue to foster developments that can only be accessed by car.

Compatible Neighborhood Land Uses

Page 48, Section 4.9.3 Mitigation Measures

- LU-4-A Policy: Reduce the dependency of vehicle travel and encourage pedestrian and multi-modal options by providing compatible land-uses in and around residential neighborhoods.

It is unclear what a “compatible land use in and around residential neighborhood” means in the context of reducing vehicle travel and encouraging multi-modal options.

Design Streets and include Streetscapes

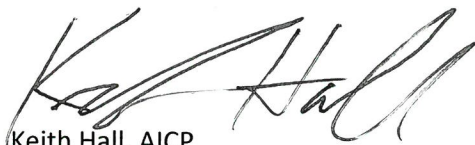
Page 48, Section 4.9.3 Mitigation Measures

- TR-4-A Policy: Incorporate design and streetscape into all major arterial and collector streets as they are constructed.

All streets are designed before they are constructed, and all streets have streetscapes (good or bad, as the term merely references the appearance of a street and its surroundings). What did the author intend for this statement to mean?

While some of these comments are editorial in nature, and, as a response to the EIS, most likely come too late to be incorporated effectively into the Plan. Nonetheless, BFT hopes to continue our relationship of proactive cooperation to benefit the City of Pasco and its residents, especially those who choose or need to ride transit now, and those who may choose or need to ride transit in the future as the City continues to grow and urbanize. Thank you for taking the time to review this feedback, and for any positive action you may take as a result. I welcome your questions and further discussion as an eager partner with vested interest in the success and sustainability of the City of Pasco’s development and growth.

Kind regards,



Keith Hall, AICP

Director of Planning and Service Development