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November 8, 2018

Rick White, Community & Economic Development Director
Community and Economic Development Department
City of Pasco
525 N. Third Ave.
Pasco, WA 99301

Dear Mr. White:

Subject: Comments on the Determination of Significance and Scoping Notice for Plan/EIS for City of Pasco Comprehensive Plan Update
Via email: Email: whiter@pasco-wa.gov

Thank you for the opportunity to comment on the Determination of Significance and Scoping Notice for the City of Pasco's Comprehensive Plan and Urban Growth Area Expansion. 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 the City of Pasco.

We support the City of Pasco Determination of Significance and the development of an environmental impact statement (EIS) to consider the impacts of the Comprehensive Plan and Urban Growth Area expansion on the built and natural environment. We support Alternative 3 in the City of Pasco Scoping Notice:

“Compact Growth Target: This alternative would allow for changes in the Plan to accommodate the 20-year population growth projection for Pasco allocated by the Office of Financial Management (OFM), and to capitalize on other development opportunities. In addition, alternative 3 will consider a growth pattern of higher density. It includes considering land use and policy changes to gain an increase in development capacity within the undeveloped and infill areas of the City. Under this alternative, the Urban Growth Area would be modified to the north of the City at a higher density/smaller area compared to Alternative 2 to accommodate future growth. It will consider land use and policy changes in order to maintain consistency with the GMA and the Countywide Planning Policies, and to accommodate growth.”

We believe the Environmental Impact Statement (EIS) will show that this alternative will accommodate projected population growth and result in the least adverse impacts on the built and natural environment. We offer our recommendations for topics to consider in the EIS.





The EIS should analyze impacts on affordable housing

Housing is an element of the environment.¹ Different alternatives may have different impacts on the affordable housing. For example, different alternatives may displace existing affordable housing which may be a significant adverse impact that should be analyzed in the EIS.

The EIS should analyze the impacts on fire services and fire safety measures

Residential growth in the City of Pasco has increased the exposure of residents on the Wildland Urban Interface to wildfires.² Expanding the city onto agricultural and rural lands will increase this exposure. Fire services are an element of the environment.³ The impacts of the alternatives and UGA expansion on community fire safety must be analyzed in the Draft EIS and mitigation measures identified such as: directing growth away from areas with a moderate to high wildfire threat level.⁴ Another potential mitigating measure would be to require new developments to meet Firewise Communities Program standards or the equivalent.

The changing climate will also increase wildfires in the West including the City of Pasco. A recent peer-reviewed study showed that human caused global warming has made wildfire fuels drier and caused an increase in the area burnt by wildfires between 1984 and 2015.⁵ Global warming's drying of wildfire fuels is projected to increasingly promote wildfire potential across the western US.⁶ The area of this increase in drying fuels includes the City of Pasco.⁷

The EIS should analyze the impacts on transportation

Transportation systems, vehicular traffic, the movement and circulation of people or goods, and traffic hazards are elements of the environment.⁸ Air traffic is also an element of the environment.⁹ The comprehensive plan and the urban growth area expansion has the potential to increase vehicle miles traveled and to increase traffic hazards. In addition, the urban growth area expansion will adversely impact the operations and expansion potential of the Tri-Cities Airport. The EIS should analyze the adverse impacts on the transportation system, including motor vehicles, air transportation, transit, walking, bicycling, and transportation safety. As required by RCW 36.70A.070(6)(iii), impacts on the state highway system should also be analyzed.

The EIS should analyze the impacts on historic, cultural, and archaeological resources

Historic and cultural preservation are elements of the environment.¹⁰ The Washington State Department of Archaeology and Historic Preservation has developed an archaeological predictive model that can predict where archaeological resources, a type of cultural resource, are likely to be located and where the department recommends archaeological surveys should be completed before earth disturbing activities and other uses and activities that can damage archaeological sites are undertaken.¹¹ The predictive model shows that Pasco and

¹ WAC 197-11-444(2)(b)(ii).

² *Franklin County, Washington Community Wildfire Protection Plan* pp. 48 – 51 (Approved by the Franklin County Commissioners 2014) accessed on Feb. 26, 2018 at: https://www.dnr.wa.gov/publications/rp_burn_cwpp_franklin_co.pdf

³ WAC 197-11-444(2)(d)(i).

⁴ See the *Franklin County, Washington Community Wildfire Protection Plan* pp. 45 – 46 (Approved by the Franklin County Commissioners 2014) for the threat level map.

⁵ John T. Abatzoglou and A. Park Williams, *Impact of anthropogenic climate change on wildfire across western US forests* 113 PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES OF THE UNITED STATES OF AMERICA (PNAS) 11770 p. 11773 (Oct. 18, 2016) accessed on Nov. 15, 2017 at: <http://www.pnas.org/content/113/42/11770>

⁶ *Id.*

⁷ *Id.* at p. 11771.

⁸ WAC 197-11-444(2)(c).

⁹ WAC 197-11-444(2)(c)(iii).

¹⁰ WAC 197-11-444(2)(b)(iv).

¹¹ Washington State Department of Archaeology and Historic Preservation WISAARD webpage accessed on Nov. 7, 2018 at: <https://dahp.wa.gov/historic-preservation/find-a-historic-place>.





the urban growth expansion area has a “high risk” and “very high risk” of cultural resources in these areas.¹² Land development can adverse impact these resources and the EIS should analyze the impacts of development authorized by the comprehensive plan and the UGA expansion on historic and cultural resources.

The EIS should analyze the impact on water resources

Water including surface water movement, quantity and quality, runoff and absorption, groundwater movement, quantity, and quality, and public water supplies are all elements of the environment.¹³ Water conservation and focusing growth into existing cities and towns can stretch water supplies and accommodate growth and it is important to reserve water for agriculture and value-added agricultural processing and manufacturing to maintain and enhance the county economy.¹⁴ The development authorized by the comprehensive plan and the urban growth area expansions can adversely affect water and increase water use and runoff. This is a probable adverse impact on the elements of the environment s and should be analyzed in the EIS.

The EIS should analyze the impacts on air quality and greenhouse gas emissions

Air quality is an element of the environment.¹⁵ Elevated ozone level averages in the Tri-Cities for 2015 through 2017 exceeded the federal regulatory limit which could trigger sanctions from the Environmental Protection Agency. As a result, a joint study was conducted with the Department of Ecology, Washington State University, and Benton Air Authority, the Tri-Cities Ozone Precursor Study (T-COPS). The study found that elevated ozone levels are not caused by one source and that traffic emissions are a major source of air pollutants in the Tri-Cities¹⁶. Particulate matter from vehicle emissions, fires, and blowing dust contribute to unhealthy air quality that increase symptoms of asthma and heart disease. Weather, topography and wind directions contribute to high-levels of ozone in the Tri-Cities. Expanding the urban growth boundary will likely increase vehicle miles travelled and emissions. Development will increase dust. These are all probable adverse impacts on elements of the environment and should be analyzed in the EIS.

Climate is also an element of the environment.¹⁷ Washington State enacted limits on greenhouse gas emissions and a statewide goal to reduce annual per capita vehicle miles traveled for light-duty vehicles. Comprehensive planning is one way to address both the reduction of greenhouse gases and vehicle miles traveled. Almost half of all greenhouse gas emissions in our state result from the transportation sector. Land use and transportation strategies that promote compact and mixed-use development and infill reduce the need to drive, reducing the amount of greenhouse gas emissions.¹⁸ Expanding the urban growth boundary will likely increase vehicle miles travelled and emissions. These are all probable adverse impacts on climate, an element of the environment, and should be analyzed in the EIS.

Additionally, the U.S. Environmental Protection Agency (EPA) found that state and local governments can significantly reduce greenhouse gas emissions through land and materials management practices such as materials efficiency, industrial ecology, green design, land revitalization, sustainable consumption, smart

¹² *Id.*

¹³ WAC 197-11-444(1)(c).

¹⁴ United States Environmental Protection Agency, *Growing Toward More Efficient Water Use: Linking Development, Infrastructure, and Drinking Water Policies* pp. 3 – 5, p. 8 (EPA 230-R-06-001: January 2006) accessed on Nov. 7, 2018 at: <https://www.epa.gov/smartgrowth/growing-toward-more-efficient-water-use> .

¹⁵ WAC 197-11-444(1)(b)(i).

¹⁶ Department of Ecology website, Air Quality Studies, “Tri-Cities Ozone Precursor Study (T-COPS)” <https://ecology.wa.gov/Asset-Collections/Doc-Assets/Air-quality/Research-Data/20171212TriCitiesOzonePrecursorStudy>, last visited November 6, 2018.

¹⁷ WAC 197-11-444(1)(b)(iii).

¹⁸ Climate Change - Washington State Department of Commerce <https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/climate-change/> last visited November 5, 2018.





growth, pollution prevention and designed for environment.¹⁹ Land use planning that encourages the use of transit, walking and cycling, and the creation of mixed-use urban centers can improve air quality by reducing automobile trips and congestion.

The EIS should analyze the impacts on agricultural and rural land

The relationship to existing land use plans is an element of the environment.²⁰ The area proposed to be included in the urban growth area includes designated agricultural lands of long-term commercial significance and rural lands. Converting these lands to urban development will be significant adverse impacts that should be analyzed in the EIS.

The EIS should analyze the impacts on priority habitats and species

The Washington State Department of Fish and Wildlife lists priority species and habitats and provides technical assistance on the designation and protection of these habitats. Plants and animals, habitats for and numbers or diversity of species of plants, fish, or other wildlife, unique species, and fish or wildlife migration routes are all elements of the environment.²¹ The conversion of agricultural and rural land to urban development will adversely impact these habitats. The expansion of impervious surfaces will also harm aquatic habitats. These adverse impacts on these elements of the environment should be analyzed in the EIS.

The designation and conservation of priority habitats and species are important to residents who hunt, fish, and view wildlife. Outdoor recreation is estimated to contribute \$81,959,000 to the Franklin County economy, generating 1,114 jobs and paying \$5,942,000 in state and local taxes.²² Protecting fish and wildlife habitats and rivers and streams will help maintain the economic benefits of outdoor recreation for Franklin County.

The EIS must analyze the impacts on native plants

Native plants of the Columbia Basin have ecological, aesthetic, and historical value. The Benton-Franklin Conservation District Heritage Gardens of the Columbia Basin and Washington Native Plant Society educate the public on the value of native plants and help prevent the conversion and degradation of these local resources and wildlife habitat. “Unconverted areas are threatened by a negative feedback loop that combines disturbance, invasion of noxious weeds and more frequent fires. When fragile soils are disturbed and cryptobiotic soil crusts are removed, annual invasive species such as cheatgrass become established.”²³ The communities of native plants and wildlife that make up the iconic Columbia Basin shrubsteppe have been severely diminished. Today, less than 50% of Washington’s historic shrubsteppe remains, and much of it is degraded, fragmented, and/or isolated from other similar habitats²⁴. For these reasons, we support the protection of Fish and wildlife habitat conservation areas designated in the Department of Natural Resources Washington Natural Heritage Program for endangered, threatened, and sensitive plant species.²⁵

¹⁹ US Environmental Protection Agency, Office of Solid Waste and Emergency Response, 2009 “Opportunities to reduce greenhouse gas emissions through materials and land use management practices,”

<https://www.epa.gov/sites/production/files/documents/ghg-land-materials-management.pdf>

²⁰ WAC 197-11-444(2)(b)(i).

²¹ WAC 197-11-444(1)(d).

²² Tania Briceno & Greg Schundler, *Economic Analysis of Outdoor Recreation in Washington State* p. 83 (Earth Economics: 2015) accessed on April 5, 2018 at:

<https://www.rco.wa.gov/documents/ORTF/EconomicAnalysisOutdoorRec.pdf>

²³ Washington Native Plant Society, <https://www.wnps.org/ecosystems/shrub-steppe> last visited on October 23, 2018.

²⁴ Washington State Department of Fish and Wildlife Habitat Conservation or Species and Ecosystems Science, <https://wdfw.wa.gov/conservation/research/projects/shrubsteppe/> last visited November 2, 2018.

²⁵ Washington State department of Natural Resources relevant data set on Rare Plants and High Quality Ecosystems: http://datawadnr.opendata.arcgis.com/datasets?group_ids=266f0b3bdc014f5ab2a96ad4ea358a28





Plants and habitats for and numbers or diversity of species of plants and unique species are all elements of the environment.²⁶ The conversion of agricultural and rural land to urban development will adversely impact these habitats. These adverse impacts on these elements of the environment should be analyzed in the EIS.

Thank you for considering our comments. If you require additional information, please contact Alison Cable at telephone 206-343-0681 x114 and email: alison@futurewise.org or Tim Trohimovich at telephone (206) 343-0681 Ext. 118 and email: tim@futurewise.org.

Very Truly Yours,

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Tim Trohimovich, AICP
Director of Planning & Law

²⁶ WAC 197-11-444(1)(d).

